

INDEPENDENT AUDIT NO. 6 – AUDIT REPORT

SYDNEY METRO WESTERN SYDNEY AIRPORT
SSI 10051

AUGUST 2024

Authorisation

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EXECUTIVE SUMMARY

The Project

Sydney Metro is responsible for delivery of the Sydney Metro Western Sydney Airport Project (the Project). The Project involves construction and operation of a new metro railway line around 23 kilometres in length between St Marys in the north and the area known as Bradfield in the south. This includes a section of the alignment that passes through and provides access to Western Sydney International (Nancy-Bird Walton) Airport, currently under construction.

Station locations for the project would include:

- A new metro station connecting to, and providing interchange with, the existing Sydney Trains suburban rail network at St Marys, north of Western Sydney International
- Two new metro stations between the existing Sydney Trains suburban rail network at St Marys and Western Sydney International: one at Orchard Hills and one at Luddenham within the Northern Gateway precinct
- Two new metro stations within the Western Sydney International site: one at the Airport Terminal and one at the Airport Business Park
- A new metro station within the Aerotropolis Core precinct (the area to be called Bradfield), south of Western Sydney International.

The alignment of the new metro railway line would:

- Include a combination of tunnel, surface and viaduct sections
- Interface with key roads including the Great Western Highway, M4 Western Motorway, Luddenham Road, the future M12 Motorway, The Northern Road, Elizabeth Drive and Badgerys Creek Road, as well as key utilities such as the Warragamba to Prospect Water Supply Pipelines
- Include waterway crossings of Blaxland Creek and Cosgrove's Creek.

Approval for the Project was granted in State Significant Infrastructure (SSI) 10051 by the Minister for Planning and Public Spaces on 23 July 2021, subject to a number of conditions.

The Project Approval has been modified on one occasion. On 14 April 2022, the then Department of Planning and Environment approved an application to amend condition E4 to reduce the biodiversity offset credit requirement. This modification has been included in the scope of this Independent Audit.

One consistency assessment has been determined during the audit period. This relates to the use of the Bringelly site for tunnelling support activities. The change has been determined by Sydney Metro to be consistent with the Approval.

Construction of the Project stages are summarised as follows:

- Advanced Enabling Works (AEW)
- Station Box and Tunnels (SBT) Preparatory Works
- SBT Bulk Excavation and Tunnelling Works

- Surface and Civil Alignment Works (SCAW) Preparatory Works
- SCAW Main Excavation and Viaduct Works
- Stations, Systems, Trains and Operations and Maintenance (SSTOM).

Construction commenced on 25 November 2021.

The Auditor understands that the following activities were conducted during the audit period (1 March 2024 to 09 August 2024)¹:

- AEW:
 - FSM: Piling works on Platforms ½ and ¾, load out of pile spoil, installation of new overhead wiring structures, temporary ULX and platform lighting, asphalt rectification, stockpiling of materials in the main compound, concrete pouring into piles, water recycling strategy and treatment design.
- SBT:
 - St Marys: TBM breakthrough, retrieval activities and transportation offsite, adjustments to the bus interchange to gain additional area for SBT operations in southwest corner, tower crane segment deliveries and erection completion, site handover to SSTOM.
 - Claremont Meadows: Water treatment plant and sediment basin operations, storage of surplus construction material from other northern sites, cross-passage ramp soil storage and delivery, spoil removal activities, concrete deliveries for invert works and shotcreting, tunnel segment transfer from Orchard Hills and crange into shaft completion, pre-cast of TBM support blocks for St Marys TBM retrieval.
 - Orchard Hills: Site topsoil/spoil storage and characterisation sampling in preparation for offsite haulage, operation and maintenance of erosion and sediment (ERSED) controls, tunnel support gantry, spoil shed demolition commencement, tunnel portal construction (including rock bolt/anchor drilling and FRP in the station box), concrete deliveries to tunnel portal, water treatment plant operation and disposal to trade waste at Claremont Meadows, demobilisation of plant and equipment from laydown areas, completion of pre-cast tunnel segment storage in the north, TBM tunnelling completion (past St Marys Senior High and The Kingsway Parklands), tunnel segment delivery completion, tunnel spoil processing, storage and haulage offsite, and grout plant operation.
 - Bringelly: Storage of surplus construction materials from other southern sites, cross passage ramp soil delivery and removal, concrete deliveries to the tunnel, FRP activities for concrete slab over loading/unloading area west of the shaft, ceased operation of the water treatment plant, TBMs Eileen and Peggy progressed to 190 Badgerys Creek Road, installation of support blocks and

¹ According to the Environmental Representative Monthly Reports, the works observed during the site inspection and the works described by the auditees during the interviews.

- structure for TBM traversal (completed), removal of traverse support structure and installation of ventilation and spoil conveyors.
- Aerotropolis (Bradfield): Establishment of TBM retrieval area, including construction of concrete pads for mobile cranes, TBM breakthrough, disassembly, retrieval and transport offsite completion, concrete works at tunnel portal, tower crane segment deliveries and erection, piling of tower crane supports within station box, and no SBT activities.
- SCAW:
 - Patons Lane: Sandstone fill and fauna crossing completion over northern tributary stream culvert and Blaxland Creek, weed spraying and hydromulching, viaduct completion across Patons Lane with segment installation.
 - Stabling and Maintenance Facility (SMF): Asbestos Containing Material (ACM) encapsulation and additional geotechnical unsuitable material added to PS105, borg dam finishing works, drainage works from SSTOM to SCAW.
 - Defence: Ongoing drainage works, fauna crossing completion, viaduct segment delivery, fill placement towards Warragamba pipeline, additional clearing, and all ACM removed to PS105.
 - Elizabeth Drive: Topsoiling and hydromulching, sandstone delivery completion and placement in formation at M12 to Cosgrove's Creek, drainage for M12 discharge, piling completion and clearing ongoing.
 - Luddenham Station: Construction of Luddenham Rd roundabout completion, structural station works ongoing, preparation for viaduct segments at Warragamba pipeline.
 - Luddenham Road South: Completion of viaduct segments placement, grading of the alignment, and ongoing revegetation.

Works on the SSTOM package of this Project has commenced but has not been considered within the scope of this Independent Audit Report. A separate Independent Audit has been conducted with additional report to be prepared for the SSTOM package.

The Independent Audit

This Audit Report presents the findings from the sixth Independent Audit on the Project, covering the period from 1 March 2024 to 09 August 2024 (the 'audit period').

The objective of this Independent Audit is to satisfy SSI 10051 Schedule 2, 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 overall outcome of the Independent Audit was positive. Relevant environmental and compliance monitoring records were being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements. A high degree of compliance was achieved.

With respect to findings from the sixth audit:

- There were 222 conditions assessed.
- 170 conditions were considered to be compliant.
- Three (3) non-compliances were identified. These relate to SBT spoil haulage trucks entering the Orchard Hills site prior to 7:00am, SCAW not submitting the 6 Monthly Construction Monitoring report to nominated recipients and SCAW not submitting the E57 report to the Department prior to the relevant OOHW commencing.
- 49 conditions were considered not triggered.
- In addition to the above, six observations were identified. These relate to the detail of complaint records in the summary complaints register, delayed uploads of current versions of documents on the CPBG and CPBUI websites, an unexpected heritage find notification, complaints regarding compression braking at Orchard Hills, and improper sediment fencing installation.

With respect to the status of the 11 findings that were open at the time of completion of the fifth audit, all previously open findings are considered by the Auditor to be closed or subject to the scope of SSTOM.

The Auditor found that the post-approval documents were of a very high standard and largely being implemented. The deficiencies in implementation are incorporated into the non-compliance and observations raised above, and detailed in Section 3.2.

The Auditor considered the completeness of the complaints register and adequacy of response to complaints. 62 complaints were recorded on the complaints register, 13 of which were classified as 'not relevant' to the Project and therefore will not be discussed further in this Report. Of the revised counts, 47 complaints were relevant to SBT, two (2) relevant to SCAW, and none were recorded in relation to FSMs works.

The most complaints were received about works at or proximal to the Orchard Hills site (38) and relating to soil and water (19). There is an opportunity to improve the recording of the 'nature of complaint' so that recipients of the summary version of the complaints register are better informed on the issues raised by stakeholders (refer finding 10051_IA6_1). When examining the responses to the complaints (both the nature of the response and the timing), it was concluded that as far as could be determined within the confines of the audit, the Auditor considers the responses to be adequate. Whilst there are several repeat complainants present in the register, the Auditor does not consider this to represent inadequacies in the responses from Sydney Metro and its contractors.

The Auditor also considered interfacing works at Orchard Hills and is of the view that coordination of Out of Hours Works is being proactively managed by Sydney Metro. Notwithstanding the ongoing complaints regarding soil and water at the Orchard Hills site, the controls at the SBT and SCAW sites at Orchard Hills were in place. Further, SBT and SSTOM were in the process of formalising a clean water bypass which means that SBT will no longer collect and treat construction water entering its site from the SSTOM site. The SCAW works on the southern portion of the Orchard Hills site are now essentially complete. Therefore interface issues with SSTOM are significantly reduced and surface water flows are managed via permanent stormwater infrastructure. These updates largely remove the surface water risk on SBT and SCAW, but means that construction water flowing from the SSTOM site is going direct to environment (and not to an adjacent construction site).

The auditees have not identified any incidents requiring notification to the Department during the audit period.

The Auditor considers that the works being undertaken and the resulting impacts are consistent with that described in the EIS and RtS. Overall, the Auditor considers the environmental performance of the Project during the audit period to be sound. The following positive observations are of note:

- SBT has been utilising an electric powered crawler crane at its Claremont Meadows site. The Auditor has not seen an electric crawler crane in use on a construction site before. This initiative reduces the potential noise impact from the site on surrounding receivers.
- M12 has put in significant effort to establish and maintain a clean water diversion at its Elizabeth Drive site. The diversion along with its temporary and permanent basins are well constructed and have essentially removed the earlier risk posed by M12 surface water flows entering the SCAW site.

Detailed findings are presented in Section 3, along with actions proposed or undertaken by the auditees to address the findings.

The Auditor would like to thank the auditees from Sydney Metro and its contractors for their high level of organisation, cooperation, and assistance during the Independent Audit.

1. INTRODUCTION

1.1 The Project

1.1.1 Overview

Sydney Metro is responsible for delivery of the Sydney Metro Western Sydney Airport Project (the Project). Approval for the Project was granted in State Significant Infrastructure (SSI) 10051 by the Minister for Planning and Public Spaces on 23 July 2021, subject to a number of conditions.²

The Project involves construction and operation of a new metro railway line around 23 kilometres in length between St Marys in the north and the area known as Bradfield in the south. This includes a section of the alignment that passes through and provides access to Western Sydney International (Nancy-Bird Walton) Airport, currently under construction.

Station locations for the Project would include:

- A new metro station connecting to, and providing interchange with, the existing Sydney Trains suburban rail network at St Marys, north of Western Sydney International
- Two new metro stations between the existing Sydney Trains suburban rail network at St Marys and Western Sydney International: one at Orchard Hills and one at Luddenham within the Northern Gateway precinct
- Two new metro stations within the Western Sydney International site: one at the Airport Terminal and one at the Airport Business Park
- A new metro station within Bradfield (the former Aerotropolis Core precinct), south of Western Sydney International.

The alignment of the new metro railway line would:

- Include a combination of tunnel, surface and viaduct sections
- Interface with key roads including the Great Western Highway, M4 Western Motorway, Luddenham Road, the future M12 Motorway, The Northern Road, Elizabeth Drive and Badgerys Creek Road, as well as key utilities such as the Warragamba to Prospect Water Supply Pipelines
- Include waterway crossings of Blaxland Creek and Cosgrove's Creek.

The Project includes works required to support its construction and operation, including all operational systems and infrastructure such as fresh air ventilation systems, signalling, communications, overhead wiring, rail corridor fencing and access tracks/paths.

A stabling and maintenance facility and operational control centre would be required to support operation of the project. The facility is proposed to be located in Orchard Hills, to the south of Blaxland Creek and east of the proposed metro line. Services facilities are proposed at Claremont Meadows and Bringelly for the St Marys to Orchard Hills tunnel and Western Sydney International

² Note that the Department of Planning and Environment (DPE) was renamed on 1 January 2024 to the Department of Planning Housing and Infrastructure (DPHI). This Report refers to the agency as the 'Department', or 'DPHI' throughout.

to Bringelly tunnel, respectively. The need for the Claremont Meadows services facility is subject to further investigation.

An overview of the Project and its location is shown in Figure 1.

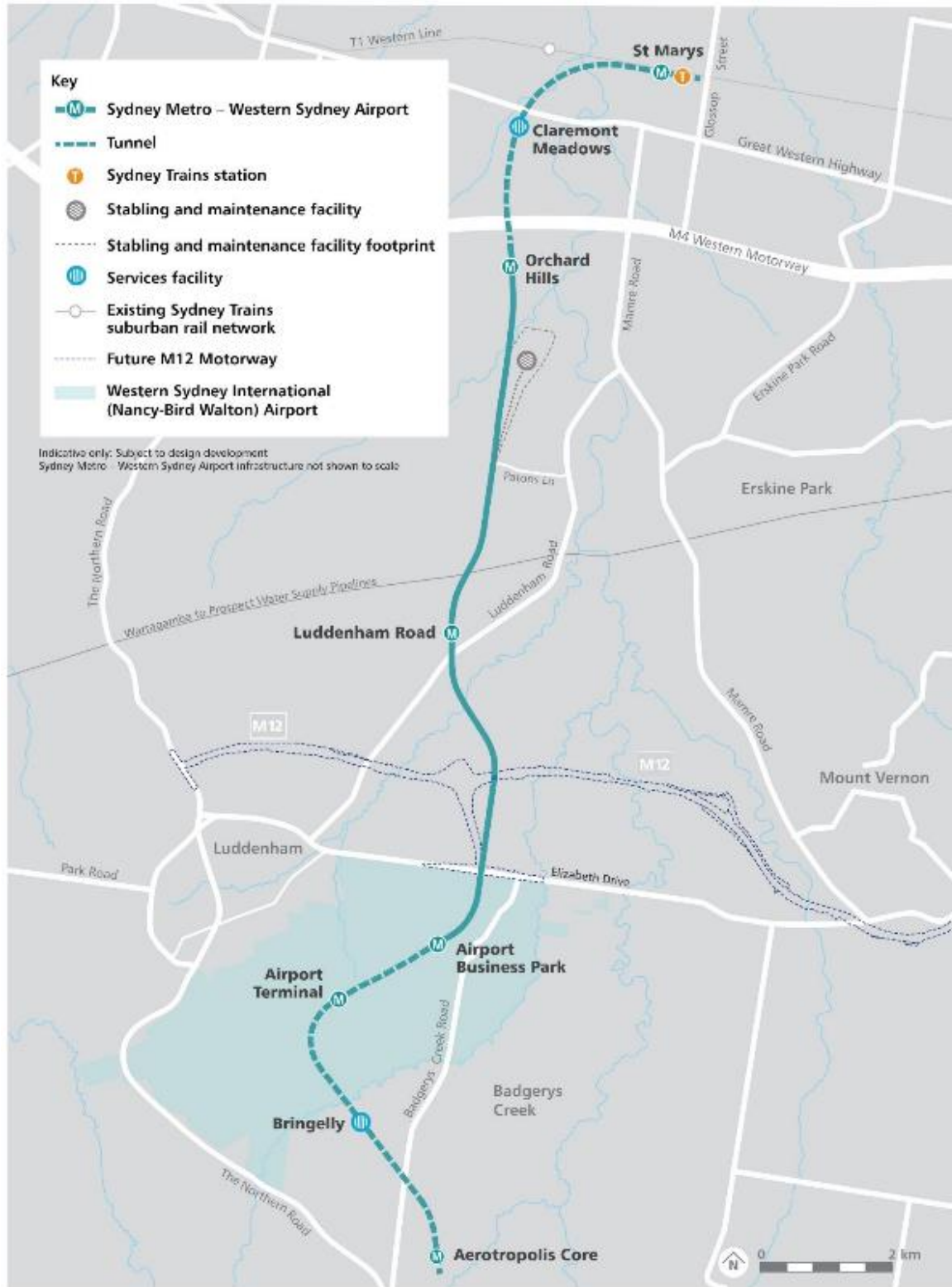


Figure 1: Project location and overview (source: Project EIS)

A section of the alignment passes through the Western Sydney International Airport site is subject to the *Airports Act 1996* (Cth) (*Airports Act*). As such, these works are outside of the scope of the Planning Approval (SSI 10051), and therefore outside of the scope of this Independent Audit. The separation of State and Commonwealth portions of the Project is illustrated in Figure 2.

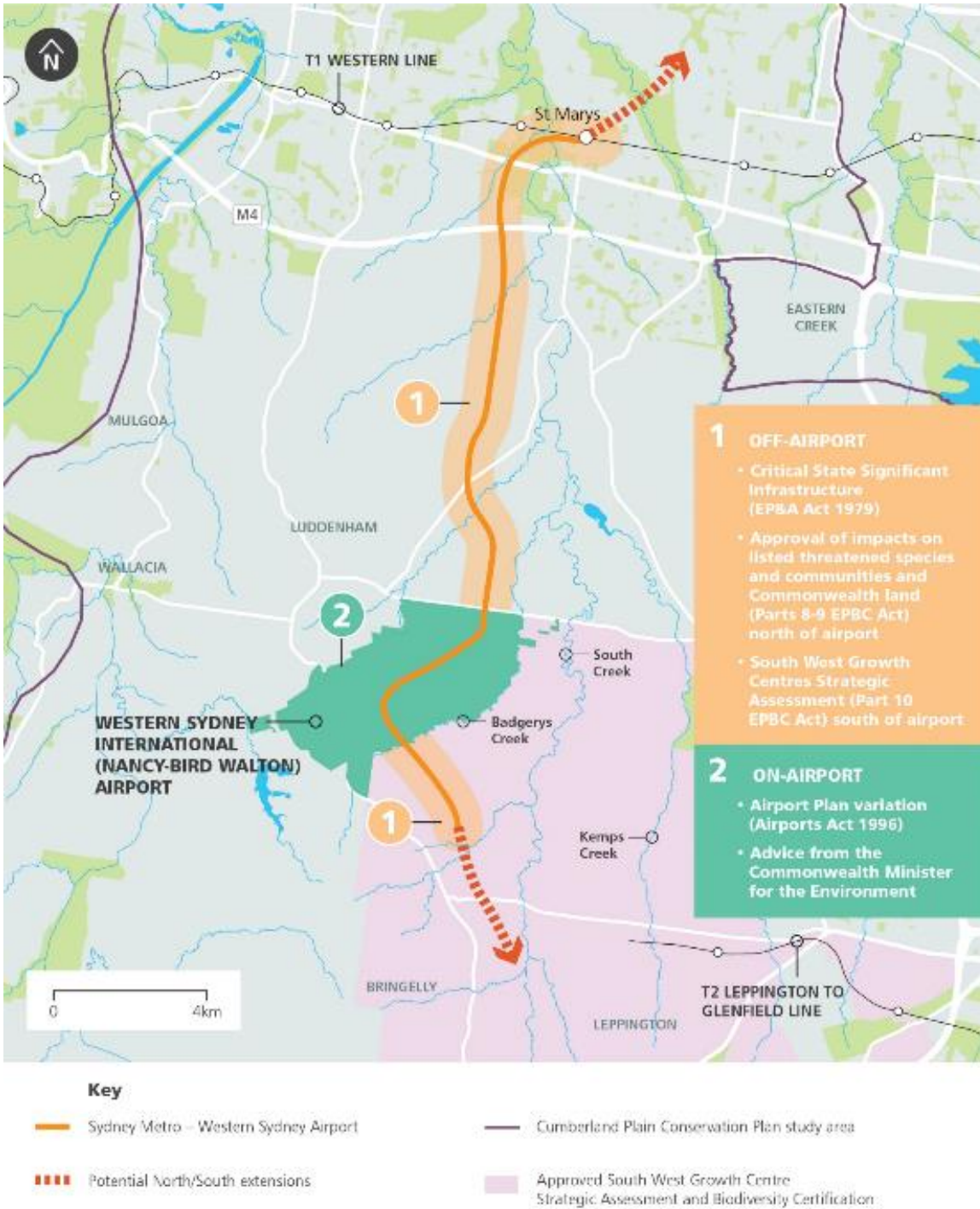


Figure 2: Sydney Metro Western Sydney Airport Planning Approval Strategy (source: Project EIS)

1.1.2 Changes to the Project

Modification 1

The Project Approval has been modified on one occasion. On 14 April 2022 (prior to the current audit period), the Department of Planning and Environment (the Department) approved an application to amend condition E4 to reduce the biodiversity offset credit requirement. This modification has been included in the scope of this Independent Audit.

Consistency Assessments / Environmental Reviews

According to the auditees one environmental review was determined during the audit period.

Bringelly tunnelling support – Environmental Review

Principal Contractor for SBT, CPBG, proposed to use the Bringelly site for tunnelling support activities. Tunnelling support activities comprise the following:

- Tunnel lining support works – A concrete delivery point, for cross passages and tunnel invert lining via the use of a concrete drop pipe. Concrete agitators would be required at-surface to supply concrete for underground tunnel works.
- Spoil Haulage – Spoil generated during cross-passage construction would be removed from the tunnels via the Bringelly shaft, temporarily stockpiled and removed from site.

Bringelly had not previously been assessed for tunnelling support activities. An assessment was carried out to determine whether the proposed change is consistent with the Project Approval. The assessment also included justification, potential impacts, benefits and proposed controls. On 17 June 2024, Sydney Metro determined that the adjustment is consistent with the Project Approval.

Refer to earlier reports regarding consistency assessments / environmental reviews determined prior to this time.

1.1.3 Staging

A Staging Report (Staging Report, Sydney Metro, Revision 10, 22 May 2024) has been prepared for the Project in accordance with conditions A10/A11. According to Revision 10 of the Staging Report, construction of the Project stages is summarised as follows:

- **Advanced Enabling Works (AEW)** – comprising establishment of key construction site and facilitation of construction activities. This includes site investigations, power and water supply works, demolition, utility diversions, and modifications to the existing transport network. The AEW stage is split into nine (9) sub-stages, as follows:
 - AEW – Demolition
 - AEW – Gas
 - AEW – Integrated Project Office (later referred to as SSTOM Project Office, or SPO)
 - AEW – Power
 - AEW – Roadworks
 - AEW – Footbridge St Marys (FSM)
 - AEW – St Marys Station Lift Relocation

- AEW – St Marys Temporary Bus Interchange (TBI)
- AEW – Water.
- **Station Box and Tunnels (SBT) Preparatory Works** – comprising site establishment works along with Non-Aboriginal archaeological investigations and (if triggered) salvage works at the western end of the St Marys Station Box, demolition, vegetation clearing, property adjustments, site levelling/grading, flood mitigation and drainage, contamination remediation works and offsite disposal including underground storage tanks and cattle dipping site(s), piling and foundation works, utility and temporary services work.
- **SBT Bulk Excavation and Tunnelling Works** – comprising Preparatory Works scope not completed prior to ER endorsement / Department approval (where required) of the nominated Construction Environmental Management Plans, Sub-plans and monitoring programs, remaining temporary piling and permanent piling, bulk excavation, acoustic shed installation, mined and Tunnel Boring Machine (TBM) tunnelling and cross passage construction, decommissioning of elements that are not handed over to follow-on contractors.
- **Surface and Civil Alignment Works (SCAW) Preparatory Works** – comprising site establishment activities, vegetation clearing, civil works set up at the stabling and maintenance facility at Orchard Hills, stockpiling of approximately 300,000 tonnes of topsoil and fill, contamination and remediation works, use of ancillary facilities.
- **SCAW Main Excavation and Viaduct Works** – comprising Preparatory Works scope not completed prior to ER endorsement / Department approval (where required) of the nominated Construction Environmental Management Plans, Sub-plans and monitoring programs, viaducts and bridges, works within riparian zones, native vegetation clearing, bulk excavation, decommissioning of elements that are not handed over to follow-on contractors.
- **Stations, Systems, Trains and Operations and Maintenance (SSTOM)** – comprising station design and fit out, urban and landscape design, precinct and transport integration works; testing and commissioning; and operation of the metro service.

A Finalisation and Auxiliary Works (FAW) stage is under development and will be incorporated into the Project's Staging Report in future.

SSTOM includes both construction and operations. SSTOM construction phases are identified in the Staging Report, however neither construction nor operations are staged at this time.

The following table indicates the construction commencement and completion dates, from Revision 10.0 of the Staging Report, and as provided by Sydney Metro during the Independent Audit.

Table 1 Construction dates

Stage	Construction start date	Construction finish date
AEW - Demolition	24/01/22	13/05/22 (prior to current audit period)
AEW – Gas	Sydney Metro advise that this stage has not commenced and may not be required.	

Stage	Construction start date	Construction finish date
AEW – SPO ³	30/01/23.	20/12/23 (prior to current audit period)
AEW – Power	04/02/22	21/09/22 (prior to current audit period)
AEW – Roadworks	25/06/22	18/08/22 (prior to current audit period)
AEW – Footbridge St Marys (FSM)	27/05/23	Estimated: Q4 2025
AEW – St Marys Station Lift Relocation	26/05/22	30/11/22 (prior to current audit period)
AEW – St Marys Temporary Bus Interchange (TBI)	24/11/21	06/06/22 (prior to current audit period)
AEW – Water	03/07/23	05/12/23 (prior to the current audit period)
SBT Preparatory Construction	19/04/22	First week of November 2022 (upon commencement of SBT Bulk Excavation and Tunnelling Works, and prior to the current audit period)
SBT Bulk Excavation and Tunnelling Works	Intended start date of 10/10/22, delayed due to wet weather until first week of November 2022.	Estimated: Q4 2024
SCAW Preparatory Construction	10/10/22	01/11/22 (upon commencement of SCAW Main Excavation and Viaduct Works, and prior to the current audit period))
SCAW Main Excavation and Viaduct Works	01/11/22	Estimated: Q2 2025
SSTOM	Estimated: Q4 2024	Ongoing (into operations)

1.1.4 Works conducted during the audit period

The Auditor understands that the following activities were conducted during the audit period (1 March 2024 to 09 August 2024)⁴:

- AEW:
 - FSM: Piling works on Platforms ½ and ¾, load out of pile spoil, installation of new overhead wiring structures, temporary ULX and platform lighting, asphalt

³ SPO did not involve construction as defined by the Approval. Dates refer to establishment works.

⁴ According to the Environmental Representative Monthly Reports, the works observed during the site inspection and the works described by the auditees during the interviews.

rectification, stockpiling of materials in the main compound, concrete pouring into piles, water recycling strategy and treatment design.

- SBT:
 - St Marys: TBM breakthrough, retrieval activities and transportation offsite, adjustments to the bus interchange to gain additional area for SBT operations in southwest corner, tower crane segment deliveries and erection completion, site handover to SSTOM.
 - Claremont Meadows: Water treatment plant and sediment basin operations, storage of surplus construction material from other northern sites, cross-passage ramp soil storage and delivery, spoil removal activities, concrete deliveries for invert works and shotcreting, tunnel segment transfer from Orchard Hills and craneage into shaft completion, pre-cast of TBM support blocks for St Marys TBM retrieval.
 - Orchard Hills: Site topsoil/spoil storage and characterisation sampling in preparation for offsite haulage, operation and maintenance of erosion and sediment (ERSED) controls, tunnel support gantry, spoil shed demolition commencement, tunnel portal construction (including rock bolt/anchor drilling and FRP in the station box), concrete deliveries to tunnel portal, water treatment plant operation and disposal to trade waste at Claremont Meadows, demobilisation of plant and equipment from laydown areas, completion of pre-cast tunnel segment storage in the north, TBM tunnelling completion (past St Marys Senior High and The Kingsway Parklands), tunnel segment delivery completion, tunnel spoil processing, storage and haulage offsite, and grout plant operation.
 - Bringelly: Storage of surplus construction materials from other southern sites, cross passage ramp soil delivery and removal, concrete deliveries to the tunnel, FRP activities for concrete slab over loading/unloading area west of the shaft, ceased operation of the water treatment plant, TBMs Eileen and Peggy progressed to 190 Badgerys Creek Road, installation of support blocks and structure for TBM traversal (completed), removal of traverse support structure and installation of ventilation and spoil conveyors.
 - Aerotropolis (Bradfield): Establishment of TBM retrieval area, including construction of concrete pads for mobile cranes, TBM breakthrough, disassembly, retrieval and transport offsite completion, concrete works at tunnel portal, tower crane segment deliveries and erection, piling of tower crane supports within station box, and no SBT activities.
- SCAW:
 - Patons Lane: Sandstone fill and fauna crossing completion over northern tributary stream culvert and Blaxland Creek, weed spraying and hydromulching, viaduct completion across Patons Lane with segment installation.
 - Stabling and Maintenance Facility (SMF): Asbestos Containing Material (ACM) encapsulation and additional geotechnical unsuitable material added to PS105, borg dam finishing works, drainage works from SSTOM to SCAW.

- Defence: Ongoing drainage works, fauna crossing completion, viaduct segment delivery, fill placement towards Warragamba pipeline, additional clearing, and all ACM removed to PS105.
- Elizabeth Drive: Topsoiling and hydromulching, sandstone delivery completion and placement in formation at M12 to Cosgrove's Creek, drainage for M12 discharge, piling completion and clearing ongoing.
- Luddenham Station: Construction of Luddenham Rd roundabout completion, structural station works ongoing, preparation for viaduct segments at Warragamba pipeline.
- Luddenham Road South: Completion of viaduct segments placement, grading of the alignment, and ongoing revegetation.

1.2 The audit team

In accordance with Schedule 2, condition A38 of SSI 10051, and Section 3.1 of the Department's 2020 document *Independent Audit Post Approval Requirements* (IAPAR), Independent Auditors must be suitably qualified, experienced, and independent of the Project, and appointed by the Planning Secretary. Table 2 presents the auditor for this, sixth, Independent Audit on the Project.

Table 2 Audit Team

Name	Company	Participation during this audit	Certification
██████████	WolfPeak	Lead Auditor	Exemplar Global Certified Lead Environmental Auditor (Certificate No 114283)

Approval of the auditor was provided by the Department on 4 July 2024. The approval is presented in Appendix B. The declaration from the Auditor is presented in Appendix F.

1.3 The audit objectives

The objective of this Independent Audit is to satisfy SSI 10051 Schedule 2, 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 IAPAR sets out the scope, methodology and reporting requirements for Independent Audit.

This Independent Audit seeks to fulfil the requirements of condition A36, to verify compliance with the relevant conditions, and assess the effectiveness of environmental management on the Project using the scope, methodology and reporting requirements from the IAPAR.

To note, condition A37 states:

Notwithstanding Condition A36, 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.

An audit program has not been prepared and, therefore, the IAPAR has been implemented in full for this sixth Independent Audit.

1.4 Audit scope

This Audit Report relates to the sixth Independent Audit on the Project, covering the period from the 1 March 2024 to 09 August 2024 (the 'audit period').

The scope of the Independent Audit comprises:

- An assessment of compliance with:
 - All conditions of consent applicable to the phase of the development that is being audited
 - All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
- 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; and
 - Feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee (if there is one for the Project), 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, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

The works and packages covered by this audit are SBT, SCAW and AEW FSM.

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – *Guidelines for Auditing Management Systems* and the methodology set out in the Department’s IAPAR.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope, criteria and program
- Consult with the Department on the audit scope.

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

- The Proponent: Sydney Metro
- The Environmental Representatives (ER): Healthy Buildings international (HBI)
- The SBT principal contractor: CPB Contractors Ghella Joint Venture (CPBG)
- The SCAW principal contractor: CPB United Infrastructure Joint Venture (CPBUI)
- The AEW FSM principal contractor: Laing O’Rourke, or LORAC (engaged by Transport for NSW, as Owner Participant of the package).

The involvement of the personnel representing the auditees is identified in Section 2.2.3 below.

WolfPeak consulted with the Department on 24 June 2024 to obtain its input into the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. On 12 July 2024, the Department responded and requested that NSW Environment Protection Authority (EPA) and both Penrith and Liverpool City Councils also be consulted. On 15 July 2024, WolfPeak consulted with these stakeholders. A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 3.

Table 3: Key issues and areas of focus raised during consultation

Stakeholder	Issue and Focus	How Addressed
Department of Planning Housing and Infrastructure	<p>The Department requested that:</p> <ul style="list-style-type: none"> • the audit is conducted in accordance with condition A36, which requires the audit to be carried out in accordance with the IAPAR 	<p>This audit was conducted in accordance with the IAPAR.</p> <p>Particular attention was given to the management of</p>

Stakeholder	Issue and Focus	How Addressed
	<p>Particular attention is paid during the audit to the:</p> <ul style="list-style-type: none"> Orchard Hills tunnelling site (currently part of the station boxes and tunnelling stage delivered by CPB Ghella joint venture) and the management of soil and water, traffic, and out of hours noise, and to the interfaces between the various Orchard Hills sites completeness of the complaints register and the adequacy of the response to and management of complaints (per condition B4, and Independent Audit PAR, s4.2.3, bullet point 9), especially in relation to the Orchard Hills sites. 	<p>tunnelling and interfacing at the Orchard Hills site. Refer to Section 3.5 of this Report.</p> <p>The completeness of the complaints register and the management of complaints was scrutinised. Refer to Sections 3.2 (finding 10051_IA6_1) and 3.6 of this Report.</p> <p>Consultation with the identified stakeholders was completed. Refer below.</p>
NSW EPA	No comments or issues to raise.	-
Penrith City Council	No comments or issues to raise.	-
Liverpool City Council	Council requested that the audit confirm that sufficient information has been provided to ensure that any damage caused to Derwent Road as a result of the approved works (including heavy vehicle movements) may be rectified in accordance with condition E86 of the Instrument of Approval.	The matters raised by Council have been assessed. Refer to Section 3.5 and the findings for E86 in Appendix A of this Report.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan and delivery program, and prepared work documents (audit checklists) and distributed to the auditees in preparation for the Independent Audit.

2.2.3 Personnel involvement

A number of people from the organisations subject to audit were involved in the Independent Audit. Table 3 presents the involvement of personnel representing the auditees.

Table 3: Key personnel involved

Organisation	Stage / Package	Position Title	Name	Involvement
Sydney Metro	All	Director – Environment, Sustainability Planning	██████████	Closing meeting
Sydney Metro	All	A/ Senior Manager Environment	██████████	Opening meetings, inspections (SBT, SCAW) interviews and document reviews, closing meetings
Sydney Metro	All	Manager Environment	██████████	Closing meetings

Organisation	Stage / Package	Position Title	Name	Involvement
Sydney Metro	All	A/Environmental Coordinator	██████████	Opening meeting, inspections, interviews and document reviews, closing meetings
Sydney Metro	All	Communications Manager	██████████	Interview and document reviews
Sydney Metro	All	Senior Communications Manager	██████████	Interview and document reviews
Sydney Metro	All	Senior Advisor Heritage	██████████	Interview and document reviews
Sydney Metro	All	Environment Specialist Culture Heritage	██████████	Interview and document reviews
Sydney Metro	All	Communications Officer	██████████	Opening meeting
CPBG	SBT	Approvals, Environment & Sustainability Manager	██████████	Opening meeting, interviews and document reviews, closing meeting
CPBG	SBT	Project Services Director	██████████	Opening meeting, closing meeting
CPBG	SBT	Approvals Manager	██████████	Opening meeting, interviews and document reviews, inspection (all SBT sites), closing meeting
CPBG	SBT	Operations Environment Manager	██████████	Inspections (all SBT sites)
CPBG	SBT	Site Supervisor	██████████	Inspection (Claremont Meadows)
CPBG	SBT	Superintendent (South)	██████████	Inspections (Bringelly and Aerotropolis)
CPBG	SBT	Sustainability Advisor	██████████	Interviews and document reviews
CPBG	SBT	Environmental Coordinator	██████████	Opening meeting, interviews and document reviews, closing meeting
CPBG	SBT	Communications Manager	██████████	Interview and document reviews
CPBUI	SCAW	Environment Manager	██████████	Opening meeting, inspection (all sites), interviews and document reviews, closing meeting
CPBUI	SCAW	Environment Coordinator	██████████	Inspection (all sites), interviews and document reviews, closing meeting
CPBUI	SCAW	Environment Coordinator	██████████	Inspection (all sites), interviews and document reviews, closing meeting

Organisation	Stage / Package	Position Title	Name	Involvement
CPBUJ	SCAW	Sustainability Advisor	[REDACTED]	Interview and document reviews
CPBUJ	SCAW	Sustainability Advisor	[REDACTED]	Interview and document reviews
CPBUJ	SCAW	Sustainability Advisor	[REDACTED]	Interview and document reviews
CPBUJ	SCAW	Community Manager	[REDACTED]	Interview and document reviews
Transport for NSW	AEW FSM	Manager Enviro and Sustainability	[REDACTED]	Opening meeting, inspection, interviews and document reviews closing meeting
LORAC	AEW FSM	Environmental Manager	[REDACTED]	Opening meeting, inspection, interviews and document reviews closing meeting
LORAC	AEW FSM	Environmental Graduate	[REDACTED]	Opening meeting, inspection, interviews and document reviews
LORAC	AEW FSM	Site Supervisor	[REDACTED]	Inspection
LORAC	AEW FSM	Project Manager	[REDACTED]	Opening meeting
LORAC	AEW FSM	Environmental Graduate	[REDACTED]	Opening meeting, inspection, interviews and document reviews

2.2.4 Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

An opening meeting was held prior to the commencement of the inspection for each package; on 2 August 2024 for SBT and SCAW, and 5 August 2024 for AEW FSM. During the opening meetings, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed. These matters were revisited at the commencement of each the interviews and document reviews as relevant.

Closing meetings were held remotely (via Teams) for SCAW on 2 September 2024 and for SBT, AEW FSM and Sydney Metro on 6 September 2024. At the closing meetings, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed.

Attendance records for the opening and closing meetings are presented in Appendix C.

2.2.5 Site inspection

The on-site inspection activities were conducted as follows:

- SBT: St Marys, Claremont Meadows, Orchard Hills, Aerotropolis and Bringelly on 2 August 2024

- SCAW: Stabling and Maintenance Facility, Elizabeth Drive, M12 to Cosgrove's Creek, Luddenham Station and Luddenham Road south and Defence on 2 August 2024.
- AEW FSM: Compound, platform and minor ancillary facility No. 3 on 5 August 2024.

The Auditor inspected the entirety of each site where it was safe to do so.

Photos are presented in Appendix E.

2.2.6 Document review and interviews

The audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement, and interviews with key Project personnel.

Refer to Section 2.2.3 for details on the personnel interviewed. Interviews and document review sessions were conducted with the auditees as follows:

- SBT and Sydney Metro: 7 and 8 August 2024 (face-to-face)
- SCAW and Sydney Metro: 9 August 2024 (face-to-face)
- AEW and Sydney Metro: 5 August 2023 (face-to-face).

In addition to the above, the Auditor raised requests for information, in order to obtain evidence that was not available during the audit interviews and document reviews. These requests were issued to the auditees on 7 and 12 August 2024. Responses were provided by the auditees between 14 and 19 August 2024.

2.2.7 Generating audit findings

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

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans; and
- Site inspections of relevant locations, activities and processes.

2.2.8 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
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.

Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes were also made to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.9 Evaluation of post audit approval documentation

The Auditor assessed whether post approval 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 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.

2.2.10 Completing the audit

The Independent Audit Report was distributed to the auditees to check factual matters and to provide responses to the findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented. The Auditor's findings have been determined independent of the auditees, the Department and any other parties, based on the evidence assessed during the audit.

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The documents audited comprised all the conditions from Schedule 2 of SSI 10051 applicable to the works being undertaken and the post approval documents relevant to the current audit period.

The primary documentation reviewed prior to and after the site visits and interviews are listed below. This list is not exhaustive. The full set of documents and evidence sighted against each requirement is detailed within Appendix A.

Primary documentation:

- Sydney Metro – Western Sydney Airport Environmental Impact Statement, 21 October 2020 (the EIS)
- Sydney Metro – Western Sydney Airport Submissions Report (no date), submitted April 2021 (the RtS)
- Sydney Metro Western Sydney Airport – Conditions of Approval (SSI 10051), 23 July 2021 (the Approval), including Modification 1, 14 April 2022
- Sydney Metro Western Sydney Airport – CSSI Staging Report, Revision 9.0, 5 May 2023 (the Staging Report)
- Sydney Metro Western Sydney Airport complaints register current to 16 August 2024
- Sydney Metro Western Sydney Airport incident register current to 9 August 2024
- Overarching Community Communication Strategy, Sydney Metro, Rev 5, 31 July 2024
- SBT Community Communications Strategy, 2 January 2024
- SBT Community Communications Strategy, Aerotropolis, 2 January 2024
- SBT Community Communications Strategy, Bringelly, 2 January 2024
- SBT Community Communications Strategy, St Marys, 2 January 2024
- SBT Community Communications Strategy, Claremont Meadows, 2 January 2024
- SBT Community Communications Strategy, Orchard Hills, 2 January 2024
- SBT Community Communications Strategy, Tunnelling, 5 May 2022
- SBT Small Business Owners Engagement Plan, St Marys, 3 October 2023
- SBT Construction Environmental Management Plan, Rev 4, 15 March 2024
- SBT Spoil Management Sub-Plan, Rev B, 14 March 2024
- SBT Waste and Recycling Management Sub-Plan, Rev 3, 15 March 2024
- SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, Rev 3, 20 February 2024 including Noise and Vibration Monitoring Program

- SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, Rev 2, 20 February 2024 including procedures
- SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, Rev 2, 15 August 2024, including groundwater monitoring program, surface water monitoring program, procedures
- SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023
- SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023 and addendum 14 February 2024
- SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19 February 2024
- SBT Overarching Construction Traffic Management Plan (CTMP), approved 16 June 2022, and sub-plans:
 - SBT CTMP Bringelly, 2 June 2022
 - SBT CTMP Claremont Meadows, 15 June 2022
 - SBT CTMP Geotech Scope North 5 April 2023
 - SBT CTMP Orchard Hills Site Establishment 27 June 2023
 - SBT CTMP Orchard Hills Operations September 2022.
- SCAW Community Communications Strategy, 28 March 2024
- SCAW Community Communications Strategy, Northern Project Region, 28 March 2024
- SCAW Community Communications Strategy, Southern Project Region, 4 March 2024
- SCAW Construction Environmental Management Plan, Rev 4, 19 July 2023
- SCAW Noise and Vibration Management Sub-plan, 19 June 2024, including noise and vibration monitoring program
- SCAW Spoil Management Plan, 29 September 2022
- SCAW Non-Aboriginal Heritage Sub-plan, 4 October 2022 including procedures
- SCAW Fauna and Flora Management Sub-plan, 19 June 2024 including procedures,
- SCAW Visual Amenity Management Plan, 19 October 2022
- SCAW Soil and Water Management Sub-plan, 30 July 2024 including surface water quality monitoring program, procedures
- SCAW Air Quality Management Subplan, 29 September 2023 including air quality monitoring program, procedures
- SCAW Waste Management Sub-plan, 19 June 2024
- SCAW Detailed Noise and Vibration Impact Statement Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13 November 2023

- SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21 September 2023
- SCAW Detailed Noise and Vibration Impact Statement, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 26 July 2023
- SCAW Detailed Noise and Vibration Impact Statement, Survey and Utility Investigation Works, 21 September 2022
- SCAW Detailed Noise and Vibration Impact Statement, Material Delivery and Stockpiling, 23 February 2023
- SCAW Detailed Noise and Vibration Impact Statement, OOHV deliveries at Elizabeth Drive, 9 January 2023
- SCAW Overarching CTMP, 3 April 2024 and sub-plans:
 - SCAW CTMP Paton’s Lane, 28 September 2022
 - SCAW CTMP Elizabeth Drive, 17 October 2022
 - SCAW CTMP Luddenham Road Gate 3, 20 November 2023
 - CTMP Lansdowne Road Gate 1, 14 May 2024
 - CTMP Luddenham Road Gates 4&5, 4 May 2023
 - CTMP Badgerys Creek Road Gate 9, 28 April 2023
- AEW FSM Construction Environmental Management Plan, 15 March 2024
- AEW FSM St Marys Detailed Noise and Vibration Impact Statement, 5 July 2023
- AEW FSM CTMP, 06 November 2023.

3.2 Non-compliances, Observations and Actions

This Section presents findings from this (sixth) audit. The summary of conditions assessed and compliance status from the sixth audit is presented in Table 5. The non-compliances and observations (along with associated recommended or completed actions) from the sixth audit period are presented in Table 6.

Detailed findings against each requirement, along with details on the auditee’s responses on draft findings (where received), are presented in Appendix A.

The status of previously open findings (at the time of completion of the fifth audit) is presented in Table 7.

Table 5: Summary of conditions assessed and compliance status from the sixth audit

Part of the Project Approval	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	47	35	0	12
Part B	11	9	0	2
Part C	22	20	1	1
Part D	8	0	0	8
Part E	134	106	2	26
Total	222	170	3	49

With respect to findings from the sixth audit:

- There were 222 conditions assessed.
- 170 conditions were considered to be compliant.
- Three (3) non-compliances were identified. These relate to SBT spoil haulage trucks entering the Orchard Hills site prior to 7:00am, SCAW not submitting the 6 Monthly Construction Monitoring report to nominated recipients and SCAW not submitting the E57 report to the Department prior to the relevant OOHW commencing.
- 49 conditions were considered not triggered.
- In addition to the above, six observations were identified. These relate to the detail of complaint records in the complaints register, delayed uploads of current versions of documents on the CPBG and CPBUI websites, an unexpected heritage find notification, complaints regarding compression braking at Orchard Hills, and improper sediment fencing installation.

With respect to the status of the 11 findings that were open at the time of completion of the fifth audit, all previously open findings are considered by the Auditor to be closed or subject to the scope of SSTOM.

Table 6: Findings from the sixth Independent Audit (August 2024)

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
10051_IA6_1	B4	Observation	<p>A Complaints Register 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:</p> <p>(a) number of complaints received;</p> <p>(b) date and time of the complaint;</p> <p>(c) number of people (in the household) affected in relation to a complaint, if relevant;</p> <p>(d) method by which the complaint was made;</p> <p>(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;</p> <p>(f) issue of the complaint;</p> <p>(g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and</p> <p>(h) if no action was taken, the reason(s) why no action was taken.</p>	<p>Observation: The Department requested that focus be provided on the completeness of the complaints register and the adequacy of actions taken to address/respond to complaints.</p> <p>The Auditor conducted a review of the Complaints Register (discussed further in Section 3.6) and completed a comparison between a set of complaints in the register against the corresponding full files in Consultation Manager.</p> <p>SCAW and FSM entries (4 in total for the audit period) in the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate.</p> <p>SBT received 58 complaints during the audit period and by and large the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate. That being said, there are some isolated instances whereby the ‘nature of the complaint’ in the summary Complaints Register issued to interested parties could be further elaborated on to reflect the issue as described in Consultation Manager. For example:</p> <ul style="list-style-type: none"> On 20/06/24 SBT received a complaint and the Register states that the complaint related to ‘truck complaint, Orchard Hills’. The corresponding Consultation Manager file identifies that the complainant raised concerns about heavy vehicle speeding, driver behaviour, revving engine and compression braking. On 18/06/24 SBT received a complaint and the Register states that the complaint related to ‘vehicle damage’. The corresponding Consultation Manager file identifies that the complainant raised concerns about the condition of the road at Orchard Hills which (according to the complainant) caused her to crash her car (with the car towed and the driver assessed and cleared at hospital). On 26/03/24 SBT received a complaint and the Register states that the complaint relates to ‘Vibration felt at property and crack formed within home.’ The corresponding Consultation Manager file identifies that the complainant raised concerns about the TBM vibration and 	<p>The Project should consider including more information in the ‘nature of complaint’ section of Consultation Manager, so that this provides more meaningful information to those receiving the Complaints Register (i.e. the ER, EPA and Department).</p>	Sydney Metro	OPEN

⁵ The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with A44/A45.

⁶ Status of finding and action according to the Auditor at the time of finalizing the Report.

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
				<p>cracking on their driveway, plus interactions with previous contractors.</p> <ul style="list-style-type: none"> On 23/03/24 SBT received a complaint and the Register states that the complaint relates to 'Dust and car wash good will offer.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) construction work causing dust which is getting onto their property and whether there is assistance provided to residents to counteract these affects like free car-washing. The file also indicates that the complaint relates to all packages at Orchard Hills (not just SBT). On 15/05/24 SBT received a complaint and the Register states that the complaint relates to 'Noise, property damage and rubbish on front of property.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) very noisy OOHW keeping them awake and that they have been noticing further cracks throughout the house (including in timber beams in the shed had a crack and also the laundry tiles). <p>Notwithstanding the above, the Auditor:</p> <ul style="list-style-type: none"> is of the view that the complaints were generally responded to in an adequate way. understands that Consultation Manager is the tool recording information on all touch points and inclusion of all details into a register that is meaningful to a broad audience is problematic the Department can request additional information on complaints received at any time and this information is available within Consultation Manager. 			
10051_IA6_2	B11	Observation	<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>...</p> <p>(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;....</p>	<p>Observation SBT: For SBT it was observed during the audit that:</p> <ul style="list-style-type: none"> the Noise and Vibration CEMP Sub-plan on the CPBG website does not include the accompanying Annexures (and these annexures do not appear to have been published elsewhere). the Aerotropolis Site Audit Reports / Site Audit Statements on the CPBG website were Section B (not Section A). <p>This was rectified prior to the drafting of the Audit Report.</p>	The SBT website was updated with the current documents prior to writing this Report.	SBT (CPBG)	CLOSED

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
10051_IA6_3	B11	Observation	<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>...</p> <p>(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;....</p>	<p>Observation SCAW: For SCAW it was observed during the audit that the Communications Strategies on the CPBUI webpage were not the current versions. This was rectified prior to the drafting of the Audit Report.</p>	<p>The SCAW website was updated with the current documents prior to writing this Report.</p>	SCAW (CPBUI)	CLOSED
10051_IA6_4	C22	Non-compliance (self-reported)	<p>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</p>	<p>Non-compliance SCAW: On 15/05/24 SCAW identified via an internal audit a non-compliance has with Section 5.5 of the SM-WSA SCAW Surface Water Monitoring Program (SWMonP), and Section 7.2 of the SM-WSA SCAW Noise and Vibration Monitoring Program (NVMonP). This was a result of the submission provision of the 6 Monthly Construction Monitoring report to nominated recipients within 60 days of the reporting period.</p> <p>The 6 Monthly Construction Monitoring Report #2 issued to the Department and published on the SCAW Website on the 21/12/23 was not reported as being available for information to the EPA or PCC in accordance with the nominated recipients list in the monitoring programs. As the report was publicly available on the project website and based on consultation with Sydney Metro and the ER, an internal Non-Conformance was raised against the CEMP and submitted to Sydney Metro on 17/05/24.</p> <p>Sydney Metro state that on further reflection following this sixth Independent Audit in August 2024, it was identified that the Non-Conformance may possibly be a Non-Compliance with C22 and the decision was made to update to a Non-Compliance Report and issue to the Department on 19/08/24.</p>	<p>On 19/08/24 this was reported to the Department in accordance with A44/A45.</p>	SCAW (CPBUI)	CLOSED
10051_IA6_5	E36	Observation	<p>The Unexpected Heritage Finds and Human Remains Procedure, 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>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. 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 Unexpected Heritage Finds and Human Remains Procedure.</p>	<p>Observation FSM: On 27/04/24 LORAC encountered a heritage item and enacted the Unexpected Finds Procedure (UFP). However, LORAC did not notify the Metro Environmental Manager as required by the UFP. This was self-identified by LORAC and reported to Sydney Metro upon becoming aware of the deficiency. This was not considered a non-compliance by LORAC or Sydney Metro on the basis that the find was a continuation of a previously reported unexpected find and that LORAC implemented the corrective action process identified in its CEMP, including notifying the heritage specialist, reviewing the workpack structure and retraining the workforce in reporting requirements.</p>	<p>LORAC implemented the corrective action process identified in its CEMP, including notifying the heritage specialist, reviewing the workpack structure and retraining the workforce in reporting requirements; and notifying Sydney Metro after the fact.</p>	FSM (LORAC)	CLOSED

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
10051_IA6_6	E41	Non-Compliance (self-reported)	<p><i>Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances:</i></p> <p><i>(a) Safety and Emergencies, including:</i></p> <p><i>(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</i></p> <p><i>(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</i></p> <p><i>(b) Low impact, including:</i></p> <p><i>(i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and</i></p> <p><i>(ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or</i></p> <p><i>(c) By Approval, including:</i></p> <p><i>(i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or</i></p> <p><i>(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</i></p> <p><i>(iii) negotiated agreements with directly affected residents and sensitive land user(s); or</i></p> <p><i>(d) By Prescribed Activity, including:</i></p> <p><i>(i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunneling) are permitted 24 hours a day, seven days a week; or</i></p> <p><i>(ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or</i></p> <p><i>(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</i></p> <p><i>(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</i></p> <p><i>(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</i></p>	<p>Non-compliance SBT: On 21/04/24 3 separate incidents of Sydney Earthworks-owned spoil haulage trucks entering Orchard Hills site between 6.30am-7am via Gate K3 on Kent Road. This resulted in a community stakeholder complaint being received on 22/04/24. This was reported to Sydney Metro and EPA and at the time CPBG investigated the complaint as to whether the three spoil trucks from Sydney Earthworks identified as coming into site prior to 07:00am constituted a non-compliance. On 29/04/24 this was confirmed. On 06/05/24 this was reported to the Department in accordance with A44/A45. The auditees are not aware of any response from the Department or EPA in relation to the matter. SBT removed one driver from site and warned the other two drivers.</p>	<p>On 06/05/24 this was reported to the Department in accordance with A44/A45. SBT removed one driver from site and warned the other two drivers.</p>	SBT (CPBG)	CLOSED

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
			<p>(vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week.</p> <p>On becoming aware of the need for emergency work in accordance with (a)(ii) 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.</p> <p>Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery</p>				
10051_IA6_7	E46	Observation	<p>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:</p> <p>(a) use of regularly serviced low sound power equipment;</p> <p>(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;</p> <p>(c) use of non-tonal reversing alarms; and</p> <p>(d) use of alternative construction and demolition techniques.</p>	<p>Observation SBT: There were 9 x complaints (from 1x receiver on Kent Road) regarding compression braking at Orchard Hills in the complaints register.</p> <p>The Auditor observes that whilst compression braking is a heavy vehicle safety feature and not prohibited on site, the NSW EPA states that exhaust brakes, engine compression or 'jake' brakes near residential areas and noise-sensitive areas such as hospitals and schools should be avoided, unless they are necessary for safety reasons.⁷</p>	<p>SBT installed Variable Message Signage was at Orchard Hills advising drivers not to use compression braking. SBT also conducted toolbox talks to advise drivers to minimise their use of compression braking where feasible.</p>	SBT (CPBG)	CLOSED
10051_IA6_8	E57	Non-Compliance (self-reported)	<p>In order to undertake out-of-hours work outside the work hours specified under Condition E38, 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:</p> <p>(a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work;</p> <p>(b) a description of the potential work, location and duration of the out-of-hours work;</p> <p>(c) the noise characteristics and likely noise levels of the work; and</p> <p>(d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition E43 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).</p> <p>The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER, EPA and the Planning Secretary prior to the out-of-hours work commencing.</p> <p>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.</p>	<p>Non-compliance SCAW: On 25/07/24 SCAW identified that the E57 report prepared for was not submitted to the Department prior to the relevant OOHW commencing. Further, the report was not submitted to the EPA at all (due to this not being required under the terms of the EPL). This was reported in accordance with A44/A45.</p>	<p>The non-compliance was reported to the Department in accordance with A44/A4.</p>	SCAW (CPBUI)	CLOSED

⁷ <https://www.epa.nsw.gov.au/your-environment/noise/vehicle-noise>

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁵	By Whom	Status ⁶
10051_IA6_9	E128	Observation	<i>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).</i>	Observation SCAW: It was observed during the audit site inspection that a portion of sediment fence was not properly installed at the Defence site. The Auditor observes that the area of concern is not in a high-risk location with respect to erosion or sedimentation.	The sediment fence was repaired prior to 05/09/24 as evidenced by the ER Inspection Report on that date.	SCAW (CPBU)	CLOSED

Table 7: Status of findings that were open at the time of finalising the fifth Independent Audit (February 2024)

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
10051_IA5_6	E13	Observation	<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 Condition E4. The Tree Survey must be submitted to the Planning Secretary for information with the Place, Urban Design and Corridor Landscape Plan required under Condition E79.</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 Condition E4. 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>Observation: Tree Surveys have been completed by each contractor that has removed trees and each have been provided to Sydney Metro. The Auditor observes the following:</p> <ul style="list-style-type: none"> To the Auditor's knowledge, tree survey data has not yet been compiled into a single Tree Survey for the purposes of revegetation and provision of replacement trees. According to the Staging Report, this condition is applicable to SBT and SCAW (although revegetation does not form part of the scope of these packages). According to the Staging Report, this conditions is not applicable to FSM (although this package has removed 17 x planted/landscape trees during construction). According to the Staging Report, this conditions is not applicable to SSTOM (although revegetation does form part of its scope, and the auditees advise that the Tree Survey will be provided by SSTOM to the Department with the PUDCLP (Stage 2) submission). 	<p>Compile tree survey data into a single Tree Survey to enable accurate replacement of trees.</p> <p>Update Staging Report to accurately reflect the applicability of this condition across each package.</p>	Sydney Metro	<p>CLOSED</p> <p>The Staging Report has been updated to accurately reflect the applicability of this condition across each stage. The Staging report was accepted by the Department on 03/07/24.</p> <p>SSTOM is charged with preparing the PUDCLP for the entire alignment and has been provided with all the tree survey data completed to date. SSTOM is outside the scope of the WolfPeak audit.</p>
10051_IA5_8	E85	Non-compliance	<p>Condition surveys of all items for which condition surveys were undertaken in accordance with Condition E84 must be undertaken by a suitably qualified and experienced person after completion of the work identified in Condition E84. The results of the surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports 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.</p>	<p>Non-compliance: Note that the Auditor raised an observation in the fourth independent audit about the failure to complete and issue post-construction survey reports for TBI, St Mary's Lift and Stairs and Power. At the time of the fourth audit, only AEW Roads (Sydney Metro the owner of affected property) had a post construction survey report issued. Refer to finding 10051_IA4_18 for details.</p> <p>Sydney Metro subsequently reported this as a non-compliance.</p> <p>Preparation and submission of post-construction survey reports for St Mary's Lift and Stairs and Power packages was deemed not required by Sydney Metro as 'no buildings/ structures deemed to be at risk as a result of construction.'</p> <p>Post-construction survey reports for TBI were issued to all properties with the exception of 30-32 and 34 Queens Street (as records of post-construction surveys were not able to be retrieved). It is understood that 34 Queen Street verbally denied access when the TBI contractor requested to complete the post condition surveys.</p>	<p>Sydney Metro subsequently reported this as a non-compliance on 21/01/24.</p> <p>Post-construction survey reports that are missing for 30-32 Queens Street should be prepared and submitted to the landowners.</p> <p>34 Queen Street should be contacted again to request access. If access is denied, this should be formally recorded. If access is granted, then the post-construction survey should be completed and issued to the landowner.</p>	Sydney Metro	<p>CLOSED</p> <p>There is still uncertainty surrounding access to 30-32 and 34 Queen St, and the issuance of the post-construction survey reports.</p> <p>That being said, SSTOM is currently undertaking construction works proximate to these receivers and post-construction condition surveys will need to be offered following completion of all construction works on the Project.</p>
10051_IA5_10	E96	Observation	<p>A Section A1 or Section A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report, which state that the contaminated land disturbed by the work has been made suitable for the intended land use, must be submitted to the</p>	<p>Observation: SBT's Aerotropolis and St Marys remediation works have been completed. A Validation Report, Site Audit Report and Section A1 Site Audit Statement was issued for Aerotropolis. According to SBT (CPBG), due to further management measures required associated with the groundwater contamination at St Marys, a Section A Site Audit Statement cannot be produced at this time, only a Section B.</p>	<p>Obtain Section A1 or A2 (A2 being that the site is suitable for its intended use subject to implementation of an environmental</p>	SBT (CPBG) / Sydney Metro	<p>CLOSED</p> <p>SBT are not able to obtain a Section A Site Audit Statement for St Marys and this requirement gets transferred to SSTOM (SSTOM is outside of</p>

⁸ The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with A44/A45.

⁹ Status of finding and action according to the Auditor at the time of finalizing the Report.

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
			<i>Planning Secretary and the Relevant Council(s) after remediation and before the commencement of operation of the CSSI.</i>	SBT have handed the St Marys site over to SSTOM for ongoing construction. Submission of documents relating to contamination are proposed to be submitted to the identified stakeholders prior to operations.	management plan) Site Audit Statements for St Marys remediation works prior to operations.		the scope of WolfPeak's audit). This process is described in the St Marys Site Audit Report.
10051_IA5_11	E101	Observation	<i>The Sustainability Plan 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>	<p>Observation: There is disagreement between Sydney Metro and SBT (CPBG) as to whether SBT will achieve the non-potable water reuse target of 33% as set out in the Sydney Metro Sustainability Plan. This is primarily a result of the high salinity groundwater recovered during construction not being able to be treated by the treatment process adopted by SBT.</p> <p>Both Sydney Metro and SBT are currently awaiting the results of the Infrastructure Sustainability Design Rating third party verification to determine what % is agreed upon (to resolve this Technical Manual interpretation issue/disagreement).</p> <p>Sydney Metro are of the view that 'the most significant portion of potable and non-potable water use for the WSA project as a whole is associated with the construction and operation of the SSTOM project. Hence Sydney Metro is of the view that the Project's overall 33% water reuse target is not currently at risk.'</p> <p>The Auditor has not sighted the breakdown of non-potable water generation/reuse volumes across each package, but notes that the intrinsic salinity of the local groundwater means that suitable treatment must be adopted to ensure that the Sydney Metro WSA Project target reuse criteria of the of 33% can be met.</p>	Review the current and future non-potable water treatment processes and reuse opportunities adopted by SBT and proposed by SSTOM to ensure they enable Sydney Metro WSA Project target reuse criteria of the of 33% to be achieved.	Sydney Metro	<p>CLOSED</p> <p>SBT has updated its approach to modelling and reporting water consumption and reuse based on the suitability of groundwater. This has been done in concert with Sydney Metro and the ISC Project Manager. The updated approach, plus capturing non-potable reuse in conveyors and processing have been incorporated into a revised SBT Sustainability Plan (23/04/24) and this has been approved by Sydney Metro. Using the revised approach the current reuse is sitting at ~59%.</p> <p>Whilst the SBT water reuse target has been resolved, whether the overall 33% target can be achieved (via reuse initiatives adopted by SSTOM) remains unclear. SSTOM is outside of the scope of the WolfPeak audit.</p>
10051_IA5_12	E108	Observation	<p><i>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):</i></p> <p><i>(a) compensate the Relevant Road Authority for the damage so caused; or</i></p> <p><i>(b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the Road Dilapidation Report.</i></p>	<p>Observation: According to the SCAW auditees, it was noted that Council had concerns over damage to Luddenham Road, and that after some time Council proceeded with rectification works.</p> <p>SCAW advised that it maintains a Luddenham Road Condition and Repair Register, detailing road degradation and works in the area / upcoming repair works. This information is communicated with Sydney Metro who manage the correspondence with Penrith City Council. Sydney Metro hold a fortnightly interface meeting between the Sydney Metro - Western Sydney Airport project management team and Penrith City Council. This forum allows for topic such as concerns over damage to Luddenham Road to be discussed.</p> <p>Sydney Metro advises that Penrith City Council have noted in their regular meetings that not all road damage is deemed attributable to Project works.</p> <p>Recently, the Sydney Metro Integration Team has commenced meetings (held 20/03/24) with the three main Project contractors to determine who should be responsible for various sections of the road they are using.</p> <p>Noting the above, it is not clear to the Auditor from the information sighted whether the damage to Luddenham Road has been caused (or exacerbated) by heavy vehicles from SCAW or other contractor, nor</p>	<p>Further engage with Penrith City Council with the view to obtain written agreement on whether SCAW or any other Sydney Metro package is liable (in all or in part) for damage to Luddenham Road.</p> <p>Ensure rectification / compensation is completed in line with the aforementioned agreement.</p>	Sydney Metro	<p>CLOSED</p> <p>SCAW now completes periodic road inspection and prepares a report which goes to Metro for discussion with Penrith City Council (in the Metro / Penrith City Council interface meeting). Stemming from this there has been an allocation of responsibility to road repairs (on both Luddenham and Kent roads to each contractor based on the primary use of the road and location of damage). Repairs have been conducted with surveys ongoing.</p> <p>Any future issues associated with this requirement will be assessed in future audits.</p>

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
				whether compensation from Sydney Metro WSA for damage to the road is warranted.			
10051_IA5_15	E128	Observation	<i>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).</i>	Observation: Approximately 40mm of rain fell on the day of the audit site inspection. During the inspection construction water was observed to be flowing from the SSTOM Orchard Hills site north to the SBT portion of the site and south to the SCAW site. In both cases, SBT and SCAW were collecting and managing the water via the water treatment plant and erosion and sediment controls respectively, before leaving the Project boundary. No off site impacts were observed.	SSTOM is outside the scope of this Independent Audit. However, it is recommended that improved surface water controls are applied on SSTOM portion of the Orchard Hills site to reduce the burden on the controls on SBT and SCAW. It is understood that SSTOM raised a non-compliance in relation to this matter (although this was not sighted by the Auditor). Coordination between SSTOM, SBT and SCAW to continue to ensure that controls across the catchments remain adequate in dealing with the cumulative surface water flows.	SBT (CPBG) and SCAW (CPBUI)	CLOSED SBT are in the process of establishing a gravity fed line allowing for the transfer of construction water from SSTOM Orchard Hills to the SBT portion of the site. An interface agreement has been prepared which steps out the expectations between each party in relation to the transfer of water between sites and off-site at the Orchard Hills interface. Once operational SSTOM will be responsible for the quality of water being released from this portion of the site. The Project team and ER's will monitor this going forward. The SCAW / SSTOM interface point is now constructed whereby the potential for dirty water to run from SSTOM to SCAW is negligible (SSTOM now have two basins with established outlets established which bypass SCAW).
10051_IA5_16	E128	Observation	<i>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).</i>	Observation: Approximately 40mm of rain fell on the day of the audit site inspection. During the inspection a significant amount of construction water was observed to be flowing from the M12 site onto the SCAW site at Elizabeth Drive. SCAW's erosion and sediment controls at this location are substantial and appear to provide more than enough protection for the SCAW catchment. However, at the time of the audit site inspection, the M12 catchment size (and volumes of water to be managed) was not known by the SCAW team. Therefore, there is no guarantee that the SCAW controls are adequate in dealing with the cumulative surface water flows from both sites.	M12 is outside the scope of this Independent Audit. However, it is recommended that SCAW and M12 coordinate to verify whether SCAW's controls are adequate in dealing with the cumulative surface water flows and, if not, upgrade both M12 and SCAW controls to make them adequate. The auditees advise that as of 22/03/24, a resolution has been reached whereby M12 water will be facilitated through SCAW via a clean water diversion to allow works to be staged in the interface area whilst maintaining Blue Book and E128 compliance. The	SCAW (CPBUI)	CLOSED SCAW has now largely constructed its permanent works basins and have included bypass diversion drain (meaning that SCAW can receive and treat its water plus the entire operational basins catchment, and allows for the temporary diversion of M12 construction water).

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
					review and endorsement of an updated Erosion and Sediment Control Plan is underway and expected to be completed in April 2024.		
10051_IA3_24	E102	Observation	<p>A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to:</p> <p>(a) evaluation of reuse options;</p> <p>(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;</p> <p>(c) measures to avoid misuse of recycled water as potable water;</p> <p>(d) consideration of the public health risks from water recycling; and</p> <p>(e) time frame for the implementation of the preferred reuse option(s).</p> <p>The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction.</p> <p>Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail.</p> <p>A copy of the Water Reuse Strategy must be made publicly available.</p> <p>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</p>	<p>Observation: SBTs preparatory construction commenced in April 2022, and main construction commenced in November 2022. The Water Reuse Strategy was finalised in July 2022 and, whilst there is no timing on the installation of rainwater harvesting, SBT had still not installed rain water harvesting on site sheds (due to changing configurations of crib shed layouts). Therefore, this element of the Water Reuse Strategy was considered not to have been implemented.</p> <p>The Auditor also observes the barrier for reuse of groundwater in tunnelling process and surface construction due to the high salinity present. SBT continue to investigate reuse options.</p>	<p>SBT (CPBG) to install rainwater harvesting on the 'permanent' office arrangement as stated by SBT in their response to this finding.</p> <p>SBT (CPBG) to continue to investigate on reuse options of treated saline groundwater, and update the Water Reuse Strategy with the outcome of the investigations. Where reuse is viable, implement the reuse options.</p>	<p>SBT (CPBG)</p> <p>Install rainwater harvesting once procurement complete.</p> <p>Prior to discharge of groundwater from construction Water Treatment Plant, update the Water Reuse Strategy with the outcome of the investigations. Where reuse is viable, implement the reuse options.</p>	<p>CLOSED</p> <p>SBT advised that the fifth Independent Audit that there is now no intention to implement rainwater harvesting on site sheds.</p> <p>The Auditor understands that SBTs investigations have determined that that salinity of groundwater and selected treatment option means that groundwater reuse in tunnelling is not feasible and will not be implemented. The Auditor considers this portion of the finding to be closed. Refer to the finding in E101 (10051_IA5_11) regarding this matter in the context of water reuse as per the Sustainability Plan requirements.</p> <p>In light of the above, it is recommended that the SBT Water Reuse Strategy be updated to reflect the intended/adopted water reuse approaches. SBT provided evidence showing that the Water Reuse Strategy was updated to reflect intended approach following completion of the Round 2 ISC Design Rating Review. The document is available on the SBT website.</p>
10051_IA4_5	B1	Observation	<p>The Overarching Community Communication Strategy as provided in the documents listed in Condition A1, or updated Strategy must be implemented for the duration of the work. Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.</p>	<p>Observation: The Overarching Community Communication Strategy (OCCS) identifies that the Communication Interface Coordination Group (CICG) members would include communications representatives from 'interfacing projects with project sites shared or adjacent to Sydney Metro.'</p> <p>The minutes for the CICG meetings between February and July 2023 indicate that attendees include relevant Sydney Metro packages, TfNSW, M12, WSA Co and Sydney Water. There do not appear to be any members from:</p> <ul style="list-style-type: none"> the Gipps Street Recreation Precinct (directly south of the SBT Claremont Meadows site). 	<p>Conduct a review of projects proximal to Sydney Metro WSA and invite representatives of projects / sites that could give rise to cumulative impacts to the CICG.</p>	<p>Sydney Metro</p> <p>31/10/23</p>	<p>CLOSED</p> <p>An update on Gipps Street Recreation Precinct (directly south of the SBT Claremont Meadows site) has been incorporated into the update from the SBT contractor for February North CICG.</p> <p>From February 2024 the Gipps Street Recreation Precinct had essentially completed construction and therefore</p>

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
				<ul style="list-style-type: none"> Council, electricity or gas network operators (noting, however, that being said, the Auditor is not aware of these stakeholders having any active projects/sites proximal to the area). <p>It is understood that Sydney Metro has set up a recurring monthly meeting between the Environmental Leads across SBT, SCAW, SSTOM and AEW to offer the opportunity to raise and discuss any issues. The Auditor notes that this does not appear to involve representatives from projects beyond Sydney Metro WSA and therefore does not directly address this finding.</p> <p>Sydney Metro also advise that the Gipps Street Recreation Precinct is being delivered by Penrith City Council. Council and SBT co-ordinate with each directly with one another on construction matters. It is the Auditor's view that this interface qualifies the project for inclusion in CIGG and that potential cumulative impacts would be best managed in that forum (instead of directly between Council and SBT).</p> <p>As works and projects continue to roll out across the alignment as part of the activation of land around the new airport, the Auditor also considers there to be value in increasing the scope of the CIGG to include representatives from projects that could give rise to cumulative impacts (rather than only those with project sites shared or adjacent to Sydney Metro).</p>			inclusion in the CIGG is redundant. Sydney Metro continue to engage with Penrith City Council on providing updates to CIGG on relevant Penrith City Council led interface. The Auditor is not aware of any formal request to / or agreement from Penrith City Council to become a member of the CIGG.
10051_IA4_16	E56	Observation	<p>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:</p> <p>(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</p> <p>(b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and</p> <p>(c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation</p> <p>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.</p>	<p>Observation: The Auditor has not identified any instances whereby respite periods are not being provided and consideration of cumulative impacts is included in Sydney Metros' CIGG forums, Metro/M12 and WSA Co working group and within internal environmental team meetings. However:</p> <ul style="list-style-type: none"> As noted in B1, the minutes for the CIGG meetings between February and July 2023 indicate that attendees include relevant Sydney Metro packages, TfNSW, M12, WSA and Sydney Water. There do not appear to be any members from the developer of the Project directly south of the Claremont Meadows site, Council, electricity or gas network operators. In making this observation the Auditor acknowledges that these stakeholders may not be delivering SSI and SSD projects, but may contribute to cumulative impacts nonetheless. Refer to the finding in B1 regarding the Auditor's view on engagement with Council on the Gipps Street Recreation Precinct. The CIGG presentations from February to July 2023 indicate that a review of the OOHW schedule being conducted across all Sydney Metro WSA packages has been presented only once in the last 6 months (in April 2023). A schedule of OOHW from third parties such as TfNSW, M12, WSA and Sydney Water does not appear to have been presented at any time in the audit period. There does not appear to be any documented interrogation of the potential for consecutive impacts from OOHW. The Sydney Metro fortnightly Compliance Working Group / Environment Team meetings and the Metro/M12 and WSA Co working group appear to discuss OOHW, but it is not clear whether this involves a proper review of all scheduled OOHW across the precincts. Again, there does not appear 	<p>It is recommended that the CIGG agenda be updated to include a monthly review of all member's forward looking plan of OOHW to confirm the potential for consecutive impacts. The Auditor understands that Sydney Metro have commenced this action.</p> <p>Introduce a process by which DNVISs and other noise and vibration assessments include activities / impacts of third parties (or include a justification as to why inclusion of this information is not required).</p>	Sydney Metro 31/01/24	CLOSED Refer to finding 10051_IA4_5 in this table regarding an update to the CIGG membership and the Gipps Street Recreation Precinct and Penrith City Council. To the Auditor's knowledge no electricity or gas network operators are currently undertaking major projects in the area. The Auditor considers this portion of the recommended action to be closed (instead tracked through finding 10051_IA4_5). Sydney Metro holds a monthly cumulative impacts contractor meeting held with metro and contractors. This helps ensures coordination and respite NOTE: This does not include third parties (e.g.: John Holland / Sydney Water, WSA, M12). Nevertheless, the Auditor considers this portion of the recommended action to be closed.

Item	Ref	Type	Requirement	Finding	Recommended or completed action ⁸	By Whom	Status ⁹
				<p>to be any documented interrogation of the potential for consecutive impacts from OOHW.</p> <p>The DNVISs prepared for the Project reference the potential for cumulative impacts, but do not appear to say with any certainty whether impacts from other projects (including construction and combined road traffic noise) have been included in the modelling. Therefore, it is unclear if the potential cumulative impacts have been fully assessed.</p>			<p>Sydney Metro has developed a tool to collate and coordinate OOHW across its Project and other Projects that contribute to the CICG (TfNSW, M12, WSA and Sydney Water. This is used as means to ensure respite is achieved.</p> <p>A review of current DNVISs indicates that Sydney Metro has not introduced a process by DNVISs and other noise and vibration assessments include activities / impacts of third parties (or include a justification as to why inclusion of this information is not required). This recommendation has not been adopted by the Project. However given the passing of time, the progress of interfacing works, the fact that it is unlikely that any further DNVISs would be developed and that noise monitoring results sighted during the audit indicate that noise levels are within predicted levels, the Auditor considers this matter closed.</p>
10051_IA4_20	E99	Observation	<i>The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.</i>	<p>Observation: Suspected asbestos containing material was identified at Orchard Hills (Lot 97) during the audit site inspection. SBT were in the process of preparing this portion of the site for handover to SSTOM. It is unclear whether the material was or was not asbestos, whether the unexpected finds procedure was enacted, nor whether this portion of the site had been subject to assessment and clearance.</p> <p>SBT and Sydney Metro advised that the DSI for this area is currently with the Contaminated Site Auditor to endorse. The draft DSI Report recommends that a RAP is not required due to the minor quantity of asbestos found, and that the Contaminated Site Auditor has provisionally agreed with this. When the DSI has been endorsed by the site auditor, Sydney Metro will instruct the next contractor (delivering SSTOM) to carry out the DSI recommendation.</p> <p>The Auditor acknowledges the information provided by SBT and Sydney Metro but this does not preclude the need to enact the Unexpected Contaminated Land and Asbestos Finds Procedure where potential asbestos containing materials are encountered. At the time of writing the Report, the area had been cordoned off but not yet cleared.</p>	Clear asbestos from Lot 97 in accordance with the DSI.	Sydney Metro (SSTOM) Prior to commencing construction that is not subject to asbestos controls.	<p>CLOSED</p> <p>On 30/11/23 Sydney Metro directed SBT to remediate Lot 97. SBT advise that remediation has commenced and validation is expected to be completed in March 2024 with a Site Audit Report / Site Audit Statement issued thereafter.</p> <p>A Validation Report was prepared (Orchard Hills SSTOM site Validation Report, JBS&G, 12/04/24) for the area and on 08/05/24 Ramboll issued a Site Audit Report and Section A Siet Audit Statement.</p>

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

As part of the Independent Audit, the Auditor reviewed the documents listed in Section 3.1 of this Report. The Auditor assessed whether the documents have been developed in accordance with the conditions and their content is adequate; and whether they have been properly implemented.

The development of the CEMPs, Sub-plans and Monitoring Programs, Community Communication Strategies and the Construction Traffic Management Plans were all completed prior to the current audit period. Evidence sighted demonstrating that consultation, endorsement and approval has been adequately completed is presented in the previous Audit Reports. The Auditor has not identified any material deficiencies with the documents and is of the view that their implementation would not result in a non-compliance.

Several findings were identified in relation to implementation of the documents (presented in Table 6 of this Report), but these do not represent any major or systemic failures.

3.4 Summary of notices from agencies

On 18 April 2024 the EPA issued a formal warning to SBT (CPBG) regarding sediment tracking being observed from the Orchard Hills site onto Lansdowne Road on 9 January 2024 (prior to the current audit period). The Auditor understands that SBT implemented control to manage the issue and no further action has been raised by the EPA.

The Department, EPA and Councils were consulted on the scope of this Independent Audit and none of the stakeholders identified notices having been issued during the audit period.

3.5 Other matters considered relevant by the Auditor or DPHI

Matters considered relevant by the Department

Interfacing works at Orchard Hills

The Department requested that the audit pay particular attention to the Orchard Hills site (tunnelling and interfacing between SSTOM, SBT and SCAW).

As noted in the previous audit, the Auditor notes that the area surrounding the Project and Western Sydney Airport is undergoing significant change and intensification in the development of land and associated infrastructure. Cumulative impacts, particularly relating to noise, dust, soil, water and property impacts from construction and associated traffic are inevitable.

Sydney Metro has been coordinating OOHW internally (via a monthly cumulative impacts meeting held with Sydney Metro and its Contractors) and with other major projects in the area through its CICG forum. Sydney Metro has also developed a tool to collate and coordinate OOHW across its Project and other projects that contribute to the CICG (TfNSW, M12, WSA and Sydney Water). This is used as a means to ensure respite is achieved and is a positive initiative.

Sydney Metro does not appear to have introduced a process in which DNVISs and other noise and vibration assessments include activities / impacts of third parties. However given the passing of

time, the progress of interfacing works, the fact that it is unlikely that any further DNVISs would be developed and that noise monitoring results sighted during the audits indicate that noise levels are within predicted levels, the Auditor does not see value in requiring DNVISs to incorporate other projects to be worthwhile for SBT, SCAW or FSM.

At the fifth audit, the Auditor also considered that the interfacing between the various sites of Sydney Metro packages (namely SSTOM to both SBT and SCAW at Orchard Hills) presented a material risk associated with surface water runoff during inclement weather if not properly managed.

At the sixth audit it was observed that (at Orchard Hills) SBT and SSTOM were in the process of formalising a clean water bypass which means that SBT will no longer collect and treat construction water entering its site from the SSTOM site. The SCAW works on the southern portion of the Orchard Hills site are now essentially complete. Therefore interface issues with SSTOM are significantly reduced and surface water flows are managed via operational stormwater infrastructure. These updates largely remove the surface water risk on SBT and SCAW, but means that construction water flowing from the SSTOM site is going direct to environment (and not to an adjacent construction site).

Completeness of the complaints register and adequacy of response to complaints

Refer to Section 3.2 (finding 10051_IA6_1) and Section 3.6.

Matters considered relevant by Liverpool City Council

Council requested that the audit confirm that sufficient information has been provided to ensure that any damage caused to Derwent Road as a result of the approved works (including heavy vehicle movements) may be rectified in accordance with condition E86 of the Instrument of Approval. The Auditor assessed the information provided by Sydney Metro during the audit regarding damage to Derwent Road and is satisfied that the Project monitors road condition to facilitate repairs (where relevant) for SBT, SCAW and FSM. The auditor refers to the evidence sighted for conditions E107 and E108 (at this and at previous audits) to support this position.

Matters considered relevant by the Auditor

At the fifth audit, the Auditor noted that surface water runoff during inclement weather from M12 to SCAW at Elizabeth Drive was significant. At that time, it was noted that the SCAW erosion and sediment controls may not be adequately designed to accommodate the volumes of water being introduced by M12.

At the sixth audit it was observed SCAW has put in significant effort to construct a clean water bypass around its temporary and permanent basins at Elizabeth Drive. This has essentially removed the risk posed by water flowing from the M12 site.

3.6 Complaints

A complaints register is being maintained for the Project using the software, Consultation Manager. The complaints register was provided to the Auditor on covering the entire audit period.

Of the 49 complaints recorded on the complaints register that were relevant to the Project, 47 were relevant to SBT, two (2) relevant to SCAW, and none were recorded in relation to FSMs works. The most complaints were received about works at or proximal to the Orchard Hills site (38) and relating to soil and water (19).

The Complaints Management System¹⁰ and register include a requirement to provide a justification for a complaint being 'unavoidable', that is a complaint '*in opposition to the Project or government policy, or complaints about issues that are within Project planning approvals.*

Four (4) of the 37 'unavoidable' complaints (received 24 June, 22 May, 29 April, and 8 April) did not have an associated justification.

Of the nine (9) 'avoidable' complaints (that is those that are '*about issues outside planning approval, or a commitment that has been given to the community or stakeholders*'), two (2) were associated with the non-compliance regarding trucks entering the site prior to permissible construction hours.

16 complaints were not relevant to SMWSA works or under investigation at the time of drafting the Audit Report.

The Auditor considered the responses to the complaints (both the nature of the response and the timing). As far as could be determined within the confines of the audit, the Auditor considers the responses to be adequate. Whilst there are several repeat complainants present in the register, the Auditor does not consider this to represent inadequacies in the responses from Sydney Metro and its contractors.

¹⁰ Construction Complaints Management System, Sydney Metro, 20 October 2023

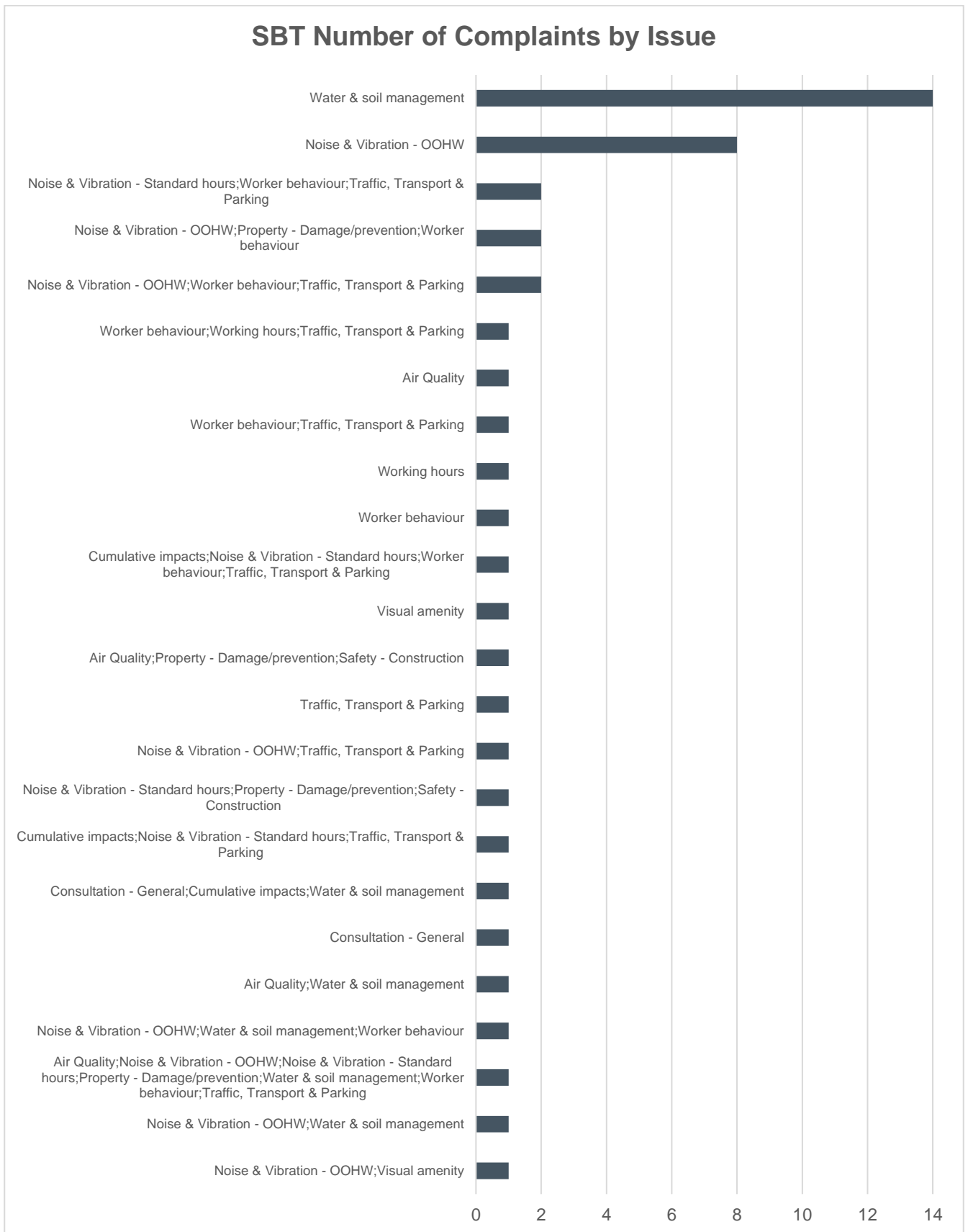


Figure 3: SBT complaints by issue

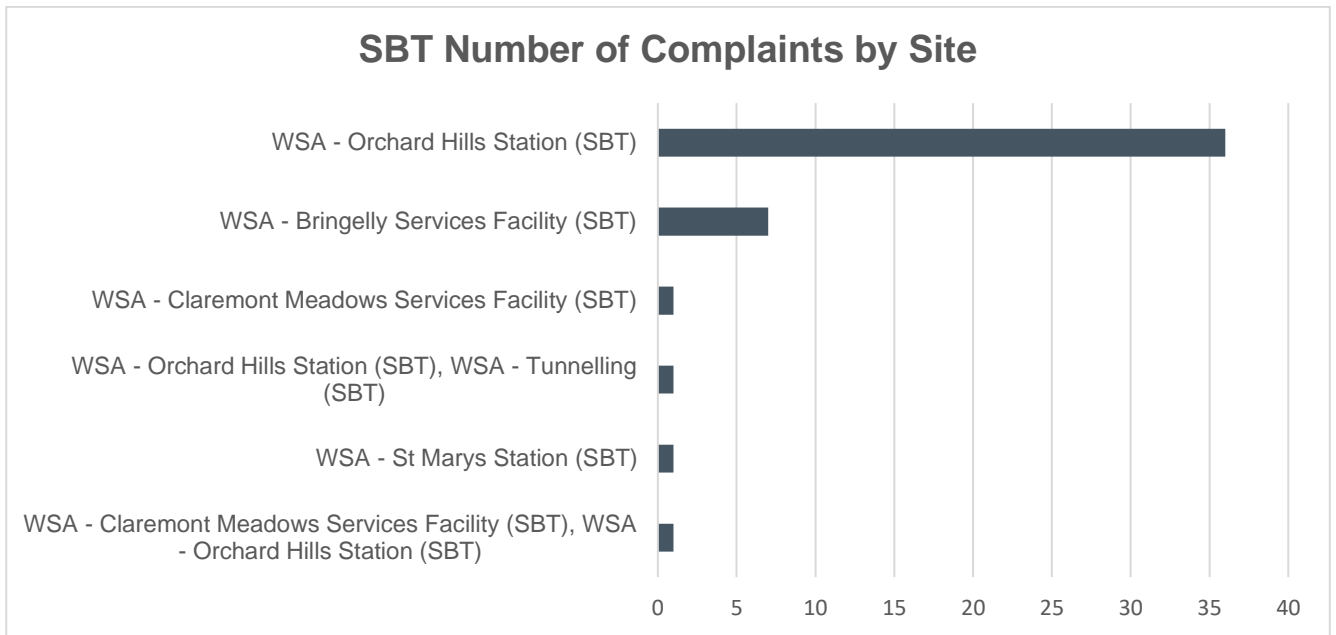


Figure 4: SBT complaints by site

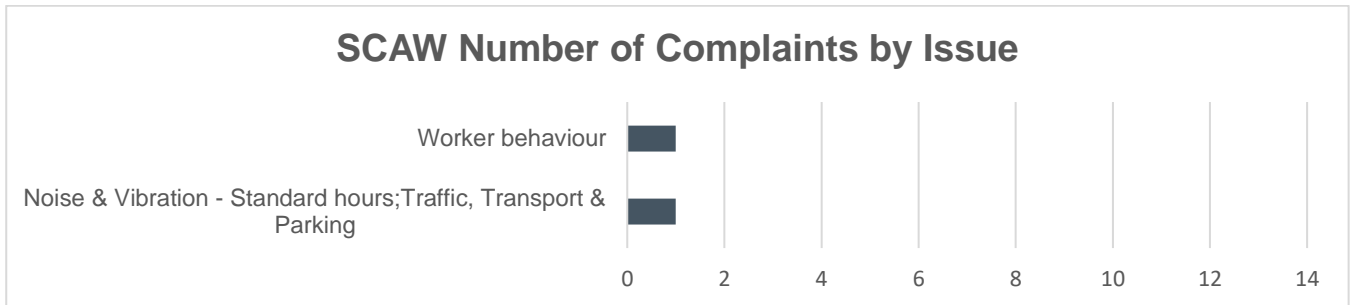


Figure 5: SCAW complaints by issue

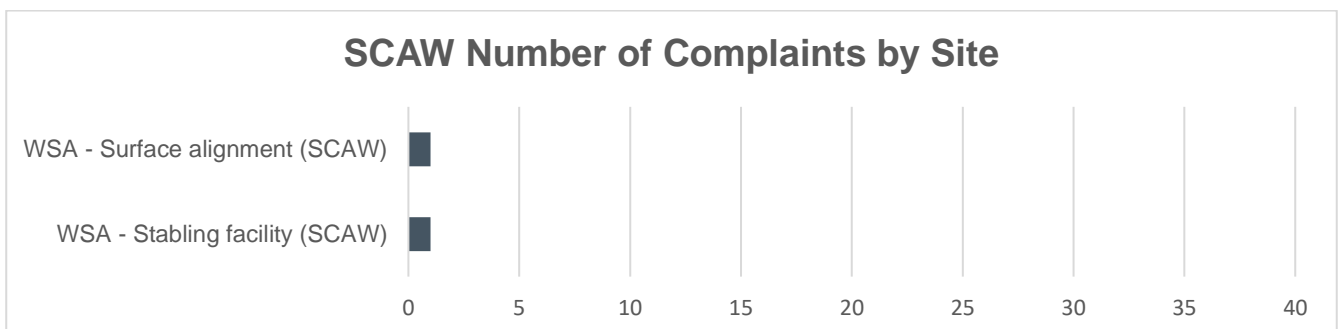


Figure 6: SCAW complaints by site

3.7 Incidents

The Project wide incident register was provided to the Auditor and the incident registers were sighted for each package. The incident registers include the date, time, location, team responsible, significance rating and actions taken to rectify the incidents.

Six (6) environmental incidents were recorded for the audit period; three for SBT, two for SCAW and one for FSM, none of which need to be reported to the Department, as required under A41/A42.

3.8 Actual versus predicted impacts

Predicted outcomes associated with the construction of the Project are described in Chapters 8 – 24 of the *Sydney Metro – Western Sydney Airport Environmental Impact Statement*, 21 October 2020 (the EIS) and Sections 4.7 – 4.17 of the *Sydney Metro – Western Sydney Airport Submissions Report* (no date), submitted April 2021 (the RtS).

The EIS and RtS included a range of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project. Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the construction requirements specified in the conditions and REMMs, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit. Any such comparison is qualitative only.

Assessment of actual vs predicted impacts considered:

- The extent to which the Project has been altered to that assessed in the EIS and RtS and approved, including whether Project boundaries have changed
- The works conducted during the audit period
- The degree of compliance with the Approval and the REMMS, relevant to the audit period and the works carried out
- The degree of adequacy and implementation of the approved post approval documents
- The number, nature and severity of incidents recorded during the audit period
- The number, nature and severity of complaints recorded during the audit period.

The Auditor observes that the Project has been altered via one modification (prior to the current audit period) and subject to one consistency assessment/environmental review during the current audit period. The assessment/review included an assessment on the potential impacts as a result of the changes and determined the revised impacts to be consistent with that outlined in the EIS and RtS and the terms of the Approval.

The works undertaken during the audit period (described in Section 1.1.4) are consistent with the construction works described in the EIS and RtS and those described in the approved consistency assessment/environmental reviews. The ER has not identified any material departures between the works undertaken during the audit period, and those identified in the EIS and RtS.

As set out in Section 3.2, the degree of compliance with the Approval and the REMMs is very high (three non-compliances were identified against 222 conditions). One non-compliance was in relation to spoil haulage trucks entering the Orchard Hills site prior to 7:00am resulting in a community complaint, and the others related to submission of documentation. None of these non-compliances are considered to present material impacts above or beyond those contemplated in the EIS or RtS.

The Auditor has found that the CEMP, Sub-plans and monitoring programs, and community and traffic related post approval documents to be of a very high quality. The shortcomings in their implementation, as identified in Section 3.3, are not likely to have presented material departures from the impacts identified in the EIS and RtS.

Complaints and incidents for Project are inevitable given the scale and complexity of the works. As noted in Sections 3.6 above, the Auditor is of the view that Sydney Metro and its contractors have, in general, adequately identified and responded to the complaints received during the audit period. There is an opportunity for improve the recording of the 'nature of complaint' so that recipients of the complaints register are better informed on the issues raised by stakeholders (refer finding 10051_IA6_1). The Auditor has not identified any complaints that indicate that impacts are different to that predicted or that they are unacceptable in their severity.

The auditees have not identified any incidents as defined by the Approval that need to be reported to the Department as required under A41/A42, that is, no incidents have been assessed as having potential or actual material harm on the environment or community (or actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000). The Auditor agrees with this assessment based on the information sighted.

3.9 Environmental performance

The environmental performance of the Project during the audit period is considered by the Auditor to be high. The following matters are of note:

- SBT has been utilising an electric powered crawler crane at its Claremont Meadows site. The Auditor has not seen an electric crawler crane in use on a construction site before. This initiative:
 - reduces the potential noise impact from the site on surrounding receivers
 - allows for greater production in carrying out tunnel support activities
 - reduces greenhouse gas emissions.
- SBT operates an Environmental Dashboard which shows all the key metrics around inspections, training, incidents, non-compliances, issues raised (both internal and by the ER), rainfall data and the like. The tool provides an accessible view on the environmental and project teams performance on site. The Auditor has not seen this dashboard tool used to the same degree on other projects.
- M12 has put in significant effort to establish and maintain a clean water diversion at its Elizabeth Drive site. The diversion along with its temporary and permanent basins are well constructed and have essentially removed the earlier risk posed by M12 surface water flows entering the SCAW site.
- The degree of compliance with the Approval and the REMMs is very high (three non-compliances were identified against 222 conditions) and compliance records were well

organized and available at the time of the site inspection and interview with key Project personnel.

- Relevant environmental and compliance monitoring activities are being undertaken by Sydney Metro, the ER and its contractors to provide verification of compliance against statutory requirements and the broader Project legislative requirements.

4. CONCLUSIONS

This Audit Report presents the findings from the sixth Independent Audit for on the Sydney Metro Western Sydney Airport (the Project), covering the period from the 1 March 2024 to 9 August 2024.

The overall outcome of the Independent Audit was very positive. Compliance records were organised and available at the time of the site inspection and interviews with Project personnel from Sydney Metro and its contractors (together, the auditees). The auditees were cooperative and responsive to the Auditors requests and requirements of the audit.

Relevant environmental and compliance records were being collected and reported to enable verification against compliance and Project environmental requirements.

With respect to findings from the sixth audit:

- There were 222 conditions assessed.
- 170 conditions were considered to be compliant.
- Three (3) non-compliances were identified. These relate to SBT spoil haulage trucks entering the Orchard Hills site prior to 7:00am, SCAW not submitting the 6 Monthly Construction Monitoring report to nominated recipients and SCAW not submitting the E57 report to the Department prior to the relevant OOHW commencing.
- 49 conditions were considered not triggered.
- In addition to the above, six observations were identified. These relate to the detail of complaint records in the complaints register, delayed uploads of current versions of documents on the CPBG and CPBUI websites, an unexpected heritage find notification, complaints regarding compression braking at Orchard Hills, and improper sediment fencing installation.

With respect to the status of the 11 findings that were open at the time of completion of the fifth audit, all previously open findings are considered by the Auditor to be closed or subject to the scope of SSTOM.

Detailed findings are presented in Section 3, along with actions proposed or undertaken by the auditees to address the findings.

The Auditor would like to thank the auditees from Sydney Metro, the ER (HBI) and its contractors (CPBG, CPBUI and Laing O'Rourke) for their high level of organisation, cooperation, and assistance during the Independent Audit.

LIMITATIONS

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The assessment of actual impacts and those predicted in the Environmental Impact Assessment(s) was a high-level assessment qualitative assessment only. The Environmental Impact Assessment(s) include a voluminous number of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project (including mitigation measures). Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the requirements specified in the report, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit.

Audits of all post approval documents prepared to satisfy the conditions, including an assessment of the implementation of Environmental Management Plans and Sub-plans, adopts a Judgement Based Sampling approach. Judgement Based Sampling is the process of selecting a sample of commitments and evidence from within the total available data set (population) to obtain and evaluate evidence about some characteristic of that population, in order to form a conclusion concerning the population.

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APPENDIX A – SSI 10051 CONDITIONS OF APPROVAL



Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
SCHEDULE 2							
PART A ADMINISTRATIVE CONDITIONS							
General							
A1	<p>The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>(a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and</p> <p>(b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021.</p>	Applicable	Applicable	Applicable	<p>Evidence referred to elsewhere in this Audit Table</p> <p>Claremont Meadows Tunnelling Support Activities – Environmental Review, CPBG, 09/02/24.</p> <p>Bringelly tunnelling support – Environmental Review, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, CPBG, 17/06/24</p>	<p>The Auditor notes that several non-compliances and observations have been identified against the requirements of this Approval. The non-compliances are not significant in number and have not appeared to result in any material impact to the environment or community. The non-compliances have been assigned to the requirement to which they relate. Therefore, the Auditor has not assigned another non-compliance with this requirement.</p> <p>FSM, SBT and SCAW have not determined any consistency assessments during the audit period.</p> <p>SBT determined two environmental reviews (which sit below a consistency assessment). The first related to utilizing Claremont Meadows for tunnel support activities. This was determined by Sydney Metro on 09/02/24. The second related to utilizing Bringelly for tunnel support activities and was determined by Sydney Metro on 17/06/24. Environmental Review, SBT, Claremont Meadows Tunnelling Support Activities, 09/02/24</p> <p>Independent Certifier (IC) is charged with verifying that the Project is designed in accordance with the contract (which includes general conformance with the EIS and associated documents). Inspection test plans are implemented, with defects raised and addressed prior to the IC closure of the relevant lot (through issue of a Notice of Substantial Completion). Sydney Metro also implements a design verification traceability matrix process, which includes an assessment of design against the Project Approval, EIS and associated documents. This provides some degree of confidence that the project is being delivered in accordance with this condition.</p> <p>The Auditor also notes that Project plans, strategies and programs have incorporated the requirements of this Approval and the REMMs as applicable (noting the finding against A2 below). By and large these have been implemented on site.</p>	C
A2	<p>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 Condition A1 unless otherwise specified in, or required under, this approval.</p>	Applicable	Applicable	Applicable	<p>Evidence referred to elsewhere in this Audit Table</p>	<p>Procedures, commitments, preventative actions, performance criteria and mitigation measures identified in the EIS have been incorporated into Project plans, strategies and programs where relevant for the scope of works being carried out. The ER and the Department have endorsed / approved the documents (where applicable) prior to the relevant works commencing. The evidence sighted with regards to implementation of the documents indicates that they are (by and large) being implemented.</p>	C
A3	<p>In the event of an inconsistency between:</p> <p>(a) the conditions of this approval and any document listed in Condition A1, the conditions of this approval will prevail to the extent of the inconsistency; and</p> <p>(b) any document listed in Condition A1, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there is an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>	Applicable	Applicable	Applicable	<p>Interview with auditees 02-09/08/24</p>	<p>This audit assesses compliance with the conditions of this Approval. Where duplication / overlap or inconsistency with a REMM has been identified, the Auditor has applied the condition requirement.</p> <p>The auditees are not aware of a material inconsistency, and has applied the requirements of this Approval against all else.</p> <p>Whilst not a compliance issue, the Auditor notes reference to REMMS SC1 and SC2 as a means to reclassify contamination risk. This is inconsistent with E92. This audit has considered this difference and assesses compliance with E92.</p>	C
A4	<p>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.</p>	Applicable	Applicable	Applicable	<p>Interview with auditees 02-09/08/24</p>	<p>Sydney Metro and its contractors are not aware of any events requiring interpretation.</p>	NT

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: <ul style="list-style-type: none"> (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 the terms of this approval 	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report) Letter DPHI to Sydney Metro, 04/07/24 (approval of WolfPeak Audit Team) Letter DPHI to Sydney Metro, 12/01/2024 (DPHI acknowledgement of Rev3 CEMP) Letter DPHI to Metro, 14/05/24 (DPHI approval of Kat McCrae as the FSM excavation director). Letter DPHI to Metro, 17/05/24 (DPHI approval of HVLR). Letter DPHI to Sydney Metro 31/01/24 (acknowledgement of receipt of second 6 monthly groundwater monitoring report).	Refer to earlier Audit Report for directions from the Department from earlier audit periods. The letters from the Department sighted during the audit period primarily comprise letters of approval and the directions (where there are any) appear to have been complied with.	C
A6	Where the terms of this approval require a document or monitoring program to be prepared, or a review to be undertaken, in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include: <ul style="list-style-type: none"> (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) a description of the outstanding issues raised by the identified party(s) and the reasons why they have not been addressed. 	Applicable	Applicable	Applicable	Refer to A18, C5, C13, C14, E8, E12, E14, E23, E35, E42, E47, E57, E64, E73, E77, E79, E83, E114, E117, E121, E130; and D5, E17, E58, E112, E119	The majority of consultation was required during earlier audit periods, when strategies, plans and programs were being developed and construction was in its infancy. Refer to earlier audit reports regarding an assessment on the adequacy of consultation during earlier audit periods. The evidence sighted at this sixth audit indicates that where consultation was required during the audit period, it has been completed.	C
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.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction.	C
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, standards or policies in the form they are in as at the date of this approval.	Applicable	Applicable	Applicable	Refer to evidence sighted elsewhere in this Audit Table.	The plans, strategies and programs sighted as part of the audit appear to reference the relevant and current guidelines, protocols, Australian Standards or policies.	C
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 Condition A41 .	Applicable	Applicable	Applicable	Interview with auditees 02-09/08/24	The auditees are not aware of any requests for extensions to timeframes during the audit period.	NT
Staging							
A10	The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a Staging Report must be prepared. The Staging Report must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any CEMP or CEMP sub plan 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.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report) Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)	The Project is being staged. The Department accepted the latest update of the Staging Report on 03/07/24. The update did not establish any new stages.	C
A11	The Staging Report must: <ul style="list-style-type: none"> (a) 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; (b) 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; (c) 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; 	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report) Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)	The Project is being staged. The previously approved, and updated Staging Report includes the information specified in this condition. The latest update included (among other things, changes to allocation of conditions allocations for FSM and SSTOM. The Department accepted the latest update on 03/07/24. The update did not establish any new stages.	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging; and</p> <p>(e) for the purposes of informing Conditions C2, C7 and C17, 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. 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> <p>1. A Staging Report may reflect the staged construction and operation of the project through geographical activities, temporal activities or activity-based staging.</p> <p>2. The risk matrix must reflect the stages of construction identified in the Staging Report</p>						
A12	The CSSI must be staged in accordance with the Staging Report , as submitted to the Planning Secretary for information.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Evidence sighted in Parts B, C and E of this Audit Table Site inspection 02, 05/08/24	The Project appears to be staged in accordance with the Staging Report.	C
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	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Evidence sighted in Parts B, C and E of this Audit Table Site inspection 02, 05/08/24	The Project appears to be staged in accordance with the Staging Report. This audit assesses compliance of the Project in consideration of the timing specified in the Staging Report. The Auditor has not identified a departure from the Staging Report.	C
A14	Where changes are proposed to the staging of construction or operation, a revised Staging Report 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.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report) Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report) Construction start dates (A10) as provided by Sydney Metro and the auditees, 20/07/23	The Project is being staged. The previously approved, and updated Staging Report includes the information specified in this condition. The Department accepted the latest update on 03/07/24. The update did not establish any new stages.	C
A15	Where changes are proposed to the risk assessment related to the staging of construction or operation, a revised Staging Report must be submitted to the Planning Secretary for information one (1) month before the lodgment of any CEMP or CEMP sub plan associated with the stage where change in risk assessment is proposed	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report) Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)	The Project is being staged. The previously approved, and updated Staging Report includes the risk assessment as specified in this condition. The Department accepted the latest update on 03/07/24. The update did not establish any new stages.	C
A16	<p>The Proponent may submit any strategies, plans or programs required by this approval on a progressive basis, within each stage of the CSSI.</p> <p>Notes:</p> <p>1. 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</p> <p>2. 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.</p> <p>3. 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.</p>	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Evidence sighted in Parts B, C and E of this Audit Table	The Project appears to be submitting strategies, plans or programs in line with the staging set out in the Staging Report.	C
Ancillary Facilities							
A17	<p>Ancillary facilities that are not identified by description and location in the documents listed in Condition A1 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>	Applicable	Applicable	Applicable	SBT interview 07-08/08/24 Construction Environment Management Plan, SBT, CPBG, 15/03/24 (SBT CEMP) SCAW interview 09/08/24 SCAW Construction Environmental Management Plan, 29/07/24(SCAW CEMP)	Table 8-3 of Chapter 8 of the EIS identifies compounds to be established at all construction sites. The auditees are not aware of any compounds being established in areas not already approved under the EIS, as the EIS allows for compounds to be established anywhere within the construction footprint. That being said, compounds are included in the approved	C

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	<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>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 Condition A22.</p>				<p>SCAW Ancillary Facility Checklist, 13/10/23 (SMF rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 17/11/23 (Elizabeth Drive rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Luddenham South rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Warragamba laydown area)</p> <p>SCAW Minor ancillary facility checklist, Luddenham South, RCD-00001, 19/04/23</p> <p>SCAW Minor ancillary facility checklist, SMF office relocations, 28/06/23</p> <p>Exempt development checklist for compound at 19 Harris Street, 08/02/23</p> <p>FSM interview 05/08/24</p> <p>Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, 13/06/23</p> <p>FSM MAF checklist (Laydowns), approved by ER 17/11/23</p>	CEMPs and SEMP or done under exempt development checklist or MAF checklists.	
Site Establishment Work							
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 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 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 Site Establishment Management Plans for each ancillary facility.</p>	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>Construction Environment Management Plan, SBT, CPBG, 15/03/24 (SBT CEMP)</p> <p>Preparatory Construction Environment Management Plan, SBT, CPBG, 13/04/2022 (SBT PCEMP)</p> <p>SCAW interview 09/08/24</p> <p>SCAW Construction Environmental Management Plan, 29/07/24(SCAW CEMP)</p> <p>SCAW Ancillary Facility Checklist, 13/10/23 (SMF rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 17/11/23 (Elizabeth Drive rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Luddenham South rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Warragamba laydown area)</p> <p>SCAW Minor ancillary facility checklist, Luddenham South, RCD-00001, 19/04/23</p> <p>SCAW Minor ancillary facility checklist, SMF office relocations, 28/06/23</p> <p>FSM interview 05/08/24</p>	SBT, SCAW and FSM did not utilize an SEMP. Ancillary facilities (including establishment and any updates) are included in the relevant CEMP or MAF checklists.	NT

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, 13/06/23</p> <p>FSM MAF checklist (Laydowns), approved by ER 17/11/23</p> <p>Site inspection 02, 05/08/24</p>		
A19	<p>With the exception of a Site Establishment Management Plan expressly nominated by the Planning Secretary to be endorsed by the ER, all Site Establishment Management Plans must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities</p>	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>Construction Environment Management Plan, SBT, CPBG, 15/03/24 (SBT CEMP)</p> <p>Preparatory Construction Environment Management Plan, SBT, CPBG, 13/04/2022 (SBT PCEMP)</p> <p>SCAW interview 09/08/24</p> <p>SCAW Construction Environmental Management Plan, 29/07/24(SCAW CEMP)</p> <p>SCAW Ancillary Facility Checklist, 13/10/23 (SMF rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 17/11/23 (Elizabeth Drive rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Luddenham South rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Warragamba laydown area)</p> <p>SCAW Minor ancillary facility checklist, Luddenham South, RCD-00001, 19/04/23</p> <p>SCAW Minor ancillary facility checklist, SMF office relocations, 28/06/23</p> <p>FSM interview 05/08/24</p> <p>Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, 13/06/23</p> <p>FSM MAF checklist (Laydowns), approved by ER 17/11/23</p> <p>Site inspection 02, 05/08/24</p>	<p>SBT, SCAW and FSM did not utilize an SEMP. Ancillary facilities (including establishment and any updates) are included in the relevant CEMP or MAF checklists.</p>	NT
A20	<p>A Site Establishment Management Plan 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>	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>Construction Environment Management Plan, SBT, CPBG, 15/03/24 (SBT CEMP)</p> <p>Preparatory Construction Environment Management Plan, SBT, CPBG, 13/04/2022 (SBT PCEMP)</p> <p>SCAW interview 09/08/24</p> <p>SCAW Construction Environmental Management Plan, 29/07/24(SCAW CEMP)</p>	<p>SBT, SCAW and FSM did not utilize an SEMP. Ancillary facilities (including establishment and any updates) are included in the relevant CEMP or MAF checklists.</p>	NT

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW Ancillary Facility Checklist, 13/10/23 (SMF rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 17/11/23 (Elizabeth Drive rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Luddenham South rock crusher)</p> <p>SCAW Ancillary Facility Checklist, 05/02/24 (Warragamba laydown area)</p> <p>SCAW Minor ancillary facility checklist, Luddenham South, RCD-00001, 19/04/23</p> <p>SCAW Minor ancillary facility checklist, SMF office relocations, 28/06/23</p> <p>FSM interview 05/08/24</p> <p>Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, 13/06/23</p> <p>FSM MAF checklist (Laydowns), approved by ER 17/11/23</p> <p>Site inspection 02, 05/08/24</p>		
A21	<p>The use of ancillary facility for construction must not commence until the CEMP required by Condition C1 relevant CEMP Sub-plans required by Condition C5 and relevant Construction Monitoring Programs required by Condition C13 have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable).</p> <p>Note: This condition does not apply to Condition A22 or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.</p>	Applicable	Applicable	Applicable	<p>Refer to evidence sighted in C1 regarding approval of the CEMPs, Sub-plans and Monitoring Programs.</p> <p>Email Metro to DPHI, 09/08/22 (notification of commencement of SCAW preparatory construction)</p> <p>Emails Metro to Penrith and Liverpool Councils, 09/08/22 (notification of commencement of SCAW preparatory construction)</p> <p>Portal lodgement, 17/10/22 (notification of commencement of SCAW main construction)</p> <p>Letter Metro to DPHI, 14/10/22 (notification of commencement of SCAW main construction)</p> <p>Email Metro to Penrith and Liverpool Councils, 18/10/22 (notification of commencement of SCAW main construction)</p> <p>Emails Metro to Penrith and Liverpool Councils, 30/09/22 (notification of SBT Main Construction)</p> <p>Letter Metro to DPHI, 30/09/22 (notification of SBT Main Construction)</p> <p>Email DPHI to Metro, 04/10/22 (acknowledgment of notification of commencement of SBT main construction)</p> <p>Letter Sydney Metro to DPHI and post approval portal lodgement record, 19/05/23 (notification of AEW FSM to DPHI)</p> <p>Emails x 2 Sydney Metro to Liverpool Council and Penrith Council, 19/05/23 (notification of AEW FSM to Council)</p>	<p>SBT, SCAW and FSM did not utilize an SEMP. Ancillary facilities (including establishment and any updates) are included in the relevant CEMP or MAF checklists.</p> <p>No new phases of construction commenced in the audit period. Refer to previous audit reports for details on commencement.</p>	NT
A22	<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>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT interview 07-08/08/24</p>	SBT have not established any MAFs.	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<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>SCAW interview 09/08/24</p> <p>SCAW Minor ancillary facility checklist, SMF office relocations, 28/06/23</p> <p>SCAW Minor Ancillary facility checklist, Lansdowne Road, (submitted to Metro, 05/03/24)</p> <p>FSM interview 05/08/24</p> <p>Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, 13/06/23</p> <p>FSM MAF checklist (Laydowns), approved by ER 17/11/23</p>	<p>SCAW has two MAFs in operation, of which are situated within the Project boundary. In the EIS, the entire project footprint is identified as potentially housing ancillary facilities.</p> <p>FSM has established multiple MAFs for use during possessions and these were approved by the ER prior to the current audit period. Refer to the previous audit report for the Auditor's view on the location on two of the MAFs.</p>	
Compliance							
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.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	Boundary screening was observed around SBT and FSM compounds. There are no sensitive land uses surrounding the SCAW site. Refer to E62 regarding the standard of the boundary screening.	C
A24	Boundary screening required under Condition A23 must minimise visual impacts on adjacent sensitive land use(s)	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	Boundary screening was observed around SBT and FSM compounds which minimises the visual impact of construction activities to some degree. There are no sensitive land uses surrounding the SCAW site. Refer to E62 regarding the standard of the boundary screening.	C
Independent Appointments							
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	Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 17/08/21 (approval of Project ERs)</p> <p>Letter DPHI to Sydney Metro, 17/03/22 (approval of inclusion of Alex Gale to ER team)</p> <p>Letter DPHI to Sydney Metro, 24/03/23 (approval of inclusion of Brett McLennan to ER team)</p> <p>Letter DPHI to Metro, 19/12/23 (approval of WolfPeak Audit Team)</p> <p>Letter Sydney Metro to Stephen Lancken, 14/12/21 (engagement of complaints mediator)</p> <p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Pane; for WSA and West Line 9/03/22</p> <p>Letter DPHI to Sydney Metro, 01/03/23 (DPHI approval of Excavation Director Lian Ramage)</p> <p>Letter DPHI to Sydney Metro, 17/06/22 (DPHI approval of the SBT St Marys Excavation Directors – Dr Ian Stuart and Jenny Winnett)</p> <p>Letter DPHI to Sydney Metro, 04/07/23 (DPHI approval of Sophie Jennings as Excavation Director for FSM).</p>	The engagement of Independent Appointments appears to have given regard to the Department's guideline. The auditees are not aware of any formal directions issued by the Department regarding this requirement.	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					Letter DPHI to Metro, 14/05/24 (DPHI approval of Kat McCrae as the FSM excavation director). Letter DPHI to Metro, 30/06/23 (DPHI approval of IPIAP)		
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.	Applicable	Applicable	Applicable	Metro interview 07-13/02/24	Metro or its contractors are not aware of any such direction.	NT
A27	Upon completion of an audit under Conditions A26 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. Note: Conditions A26 and A27 apply to all Independent Appointments including the ER and Independent Auditor	Applicable	Applicable	Applicable	Metro interview 07-13/02/24	Metro or its contractors are not aware of any such direction.	NT
Environment Representative							
A28	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 17/08/21 (approval of Project ERs) Letter DPHI to Sydney Metro, 17/03/22 (approval of inclusion of Alex Gale to ER team) Letter DPHI to Sydney Metro, 24/03/23 (approval of inclusion of Brett McLennan to ER team)	The ERs (x 4) were approved by the Department prior to the works for which they are responsible for, and prior to the current audit period.	C
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 Condition A1 and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 17/08/21 (approval of Project ERs) Letter DPHI to Sydney Metro, 17/03/22 (approval of inclusion of Alex Gale to ER team) Letter DPHI to Sydney Metro, 24/03/23 (approval of inclusion of Brett McLennan to ER team)	The ERs (x 4) were considered by the Department to be suitably qualified, experienced and independent of the project. The ERs were approved by the Department prior to the works for which they are responsible for, and prior to the current audit period.	C
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 SSI.	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 17/08/21 (approval of Project ERs) Letter DPHI to Sydney Metro, 17/03/22 (approval of inclusion of Alex Gale to ER team) Letter DPHI to Sydney Metro, 24/03/23 (approval of inclusion of Brett McLennan to ER team)	The ERs (x 4) have been engaged on the Project. Both were considered by the Department to be suitably qualified, experienced and independent of the project. The ERs were approved by the Department prior to the works for which they are responsible for, and prior to the current audit period. Refer to A32 with respect to carrying out their functions during the audit period.	C
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 17/08/21 (approval of Project ERs) Letter DPHI to Sydney Metro, 17/03/22 (approval of inclusion of Alex Gale to ER team) Letter DPHI to Sydney Metro, 24/03/23 (approval of inclusion of Brett McLennan to ER team)	The ERs (x 4) were considered by the Department to be suitably qualified, experienced and independent of the Project. The ERs were approved by the Department prior to the works for which they are responsible for, and prior to the current audit period.	C
A32	For the duration of the work until the commencement of operation, 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; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (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; (d) review documents identified in Conditions A10, A18, A20, C1, C5 and C13 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:	Applicable	Applicable	Applicable	ER Monthly Reports for February – July 24 Letter DPHI to Sydney Metro, 19/12/23 (DPHI extension of December 2023 ER Monthly Report (and all future December reports). DPHI post approval lodgement records, 07/03/24, 08/04/24, 06/04/24, 07/05/24, 07/06/24, 05/07/24. (lodgement of ER Monthly Reports) Letter ER to Sydney Metro, 27/02/24 (ER endorsement of minor update to SBT NVMP, FFMP)	Refer to Independent Audit No. 3 and 4 Audit Reports for endorsements of documents that occurred prior to the current audit period. Evidence was provided showing the development and review process by the ER to ensure that the documents are consistent with the conditions and that the necessary endorsements/approvals have been completed. Note that some plans are in the process of being updated / endorsed at the time of the audit. Ancillary facilities have been endorsed / approved prior to their establishment.	C

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	<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)(ii) 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 Conditions A10, A18, A20, C1, C5 and C13 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 Condition A36;</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 Condition A22; and</p> <p>(j) consider any minor amendments to be made to the Site Establishment Management Plan, CEMP, CEMP Sub-plans and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the Site Establishment Management Plan, CEMP, CEMP Sub-plans 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 Environmental Representative Monthly Report 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 Low Impact Work definition.</p> <p>With respect to (d) above, the ER is not required to endorse the specialist content in documents requiring specialist review and / or endorsement.</p>				<p>Letter ER to Sydney Metro, 15/03/24 (ER endorsement of minor amendment to FSM CEMP)</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter ER to Sydney Metro, 18/03/24 (ER endorsement of minor amendment to the SBT CEMP)</p>	<p>The ER Monthly Report provide evidence of the monitoring of the works, and is consistent with the ER Protocol. The Reports summarise the inspection reports. The inspection reports identify relevant matters (attendees, activities, weather, observations and actions, along with the severity of deficiency and the priority of the actions). All Monthly Reports were submitted within 7 days of the end of the month (noting that the March Report was submitted 12:13am on 08/04/24). The ER identified a range of deficiencies in site controls, which were addressed by the project teams in a timely and appropriate manner. The Reports do not indicate any material or systematic failures.</p> <p>The Auditor is not aware of the Department requiring the ER to assist with audits.</p> <p>The Auditor is not aware of the Department requiring the ER to assist with complaints. That being said, the ER was involved in the escalation of 1 x complaint to the Complaints Mediator as per Overarching Community Communications Strategy, the Construction Complaints Management System; and conditions B2, B8-B10 of this Approval. This concluded prior to the current audit period. Refer B2, B8-B10.</p>	
A33	<p>The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A32 (including preparation of the ER monthly report), as well as:</p> <p>(a) the Complaints Register (to be provided on a weekly basis or as requested); and</p> <p>(b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).</p>	Applicable	Applicable	Applicable	<p>Email Sydney Metro to HBI (and others), (weekly issue of complaints register)</p> <p>Bringelly tunnelling support – Environmental Review, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, CPBG, 17/06/24</p> <p>Claremont Meadows Tunnelling Support Activities – Environmental Review, CPBG, 09/02/24.</p> <p>ER Monthly Reports for February – July 24</p>	<p>The ER receives the complaints register weekly.</p> <p>FSM, SBT and SCAW have not determined any consistency assessments during the audit period.</p> <p>SBT determined two environmental reviews (which sit below a consistency assessment). The first related to utilizing Claremont Meadows for tunnel support activities. This was determined by Sydney Metro on 09/02/24. The second related to utilizing Bringelly for tunnel support activities and was determined by Sydney Metro on 17/06/24. According to the ER Monthly Reports, both were provided to the ER prior to commencement of the relevant activities.</p>	C
Notification of Commencement							
A34	<p>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.</p>	Applicable	Applicable	Applicable	<p>Emails Metro to Penrith and Liverpool Councils, 30/09/22 (notification of SBT Main Construction)</p> <p>Letter Metro to DPFI, 30/09/22 (notification of SBT Main Construction)</p> <p>Email DPFI to Metro, 04/10/22 (acknowledgment of notification of commencement of SBT main construction)</p> <p>Email Metro to DPFI, 09/08/22 (notification of commencement of SCAW preparatory construction)</p> <p>Emails Metro to Penrith and Liverpool Councils, 09/08/22 (notification of commencement of SCAW preparatory construction)</p>	<p>Notification of all stages occurred prior to the relevant works commencing and prior to the current audit period.</p>	C

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					<p>Portal lodgement, 17/10/22 (notification of commencement of SCAW main construction)</p> <p>Letter Metro to DPHI, 14/10/22 (notification of commencement of SCAW main construction)</p> <p>Email Metro to Penrith and Liverpool Councils, 18/10/22 (notification of commencement of SCAW main construction)</p> <p>Letter Sydney Metro to DPHI and post approval portal lodgement record, 19/05/23 (notification of AEW FSM to DPHI)</p> <p>Emails x 2 Sydney Metro to Liverpool Council and Penrith Council, 19/05/23 (notification of AEW FSM to Council)</p> <p>Letter Sydney Metro to DPHI and post approval lodgement record, 09/06/23 (notification of AEW Water to DPHI)</p> <p>Emails x 2 Sydney Metro to Liverpool Council and Penrith Council, 09/06/23 (notification of AEW Water to Council)</p>		
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.	Applicable	Applicable	Applicable	<p>Emails Metro to Penrith and Liverpool Councils, 30/09/22 (notification of SBT Main Construction)</p> <p>Letter Metro to DPHI, 30/09/22 (notification of SBT Main Construction)</p> <p>Email DPHI to Metro, 04/10/22 (acknowledgment of notification of commencement of SBT main construction)</p> <p>Email Metro to DPHI, 09/08/22 (notification of commencement of SCAW preparatory construction)</p> <p>Emails Metro to Penrith and Liverpool Councils, 09/08/22 (notification of commencement of SCAW preparatory construction)</p> <p>Portal lodgement, 17/10/22 (notification of commencement of SCAW main construction)</p> <p>Letter Metro to DPHI, 14/10/22 (notification of commencement of SCAW main construction)</p> <p>Email Metro to Penrith and Liverpool Councils, 18/10/22 (notification of commencement of SCAW main construction)</p> <p>Letter Sydney Metro to DPHI and post approval portal lodgement record, 19/05/23 (notification of AEW FSM to DPHI)</p> <p>Emails x 2 Sydney Metro to Liverpool Council and Penrith Council, 19/05/23 (notification of AEW FSM to Council)</p> <p>Letter Sydney Metro to DPHI and post approval lodgement record, 09/06/23 (notification of AEW Water to DPHI)</p> <p>Emails x 2 Sydney Metro to Liverpool Council and Penrith Council, 09/06/23 (notification of AEW Water to Council)</p>	Notification of all stages occurred prior to the relevant works commencing and prior to the current audit period.	C
Independent Environmental Audit							
A36	Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	Applicable	Applicable	Applicable	<p>Independent Audit No. 5 – Audit Report, WolfPeak, 04/04/24</p> <p>DPHI post approval portal lodgement, 24/04/24 (submission of fifth Audit Report and auditee response).</p> <p>https://www.sydneymetro.info/sites/default/files/2024-04/Sydney%20Metro%20WSA%20Independent%20Audit</p>	<p>The fifth Independent Audit was conducted in accordance with the IAPAR and submitted to the Department within the required timeframes. To the Auditor's knowledge no feedback on the fifth Audit Report was provided by the Department.</p> <p>This (sixth) Independent Audit has been conducted in accordance with the IAPAR.</p>	C

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					%20No.5%20-%20Audit%20Report%20%28SBT%2C%20SCAW%20and%20AEW%29.pdf https://www.sydneymetro.info/sites/default/files/2024-04/Sydney%20Metro%20WSA%20Independent%20Audit%20No.5%20-%20SM%20Response%20to%20Findings.pdf Letter DPHI to Sydney Metro, 04/07/24 (approval of WolfPeak Audit Team) Email DPHI to WolfPeak, 12/07/24 (DPHI input into sixth audit scope)		
A37	Notwithstanding Condition A36 , 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	Applicable	Applicable	Applicable	-	No Audit Program has been prepared. The audits have proceeded under the IAPAR as per A36.	NT
A38	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 04/07/24 (approval of WolfPeak Audit Team)	The WolfPeak audit team was approved prior to commencement of the sixth Independent Audit, excluding SSTOM (carried out by a separate audit team).	C
A39	The Planning Secretary may require the initial and subsequent Independent Audits 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.	Applicable	Applicable	Applicable	Letter DPHI to Sydney Metro, 04/07/24 (approval of WolfPeak Audit Team) Email DPHI to WolfPeak, 12/07/24 (DPHI input into sixth audit scope)	The auditees and the auditor are not aware of any change in timing. The Department did not raise any changes during consultation on this fifth audit.	C
A40	Independent Audit Reports 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 Independent Audit Post Approval Requirements (DPIE, 2020), unless otherwise agreed by the Planning Secretary.	Applicable	Applicable	Applicable	Independent Audit No. 5 – Audit Report, WolfPeak, 04/04/24 DPHI post approval portal lodgement, 24/04/24 (submission of fifth Audit Report and auditee response). https://www.sydneymetro.info/sites/default/files/2024-04/Sydney%20Metro%20WSA%20Independent%20Audit%20No.5%20-%20Audit%20Report%20%28SBT%2C%20SCAW%20and%20AEW%29.pdf https://www.sydneymetro.info/sites/default/files/2024-04/Sydney%20Metro%20WSA%20Independent%20Audit%20No.5%20-%20SM%20Response%20to%20Findings.pdf	The fifth Independent Audit was conducted in accordance with the IAPAR and submitted to the Department within the required timeframes. To the Auditor's knowledge no feedback on the fourth Audit Report was provided by the Department.	C
Incident And Non-Compliance Notification And Reporting							
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	Applicable	Applicable	Applicable	Incident records current to 09/08/24	The incident registers sighted are current and identify a range of minor incidents associated with leaks and spills and the like on SBT, SCAW and FSM packages. None of the incidents are considered by the auditees to be notifiable under the terms of the approval. According to the incident register and associated reports, there does not appear to have been risk of material harm.	NT
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.	Not Applicable	Applicable	Applicable	Incident records current to 09/08/24	The incident registers sighted are current and identify a range of minor incidents associated with leaks and spills and the like on SBT, SCAW and FSM packages. None of the incidents are considered by the auditees to be notifiable under the terms of the approval. According to the incident register and associated reports, there does not appear to have been risk of material harm. None of the incidents were located in the Controlled Areas.	NT
A43	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A.	Applicable	Applicable	Applicable	Incident records current to 09/08/24	The incident registers sighted are current and identify a range of minor incidents associated with leaks and spills and the like on SBT, SCAW and FSM packages. None of the incidents are considered by the auditees to be notifiable under the terms of the	NT

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						approval. According to the incident register and associated reports, there does not appear to have been risk of material harm. None of the incidents were located in the Controlled Areas.	
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.	Applicable	Applicable	Applicable	ER Monthly Reports for February – July 24 SBT Non-compliance report 21/04/24 (identified 29/04/24) and submission to DPHI 06/05/24 SCAW Non-compliance report 17/05/24 (and submission to DPHI on 19/08/24) failure to submit monitoring reports. SCAW Non-compliance report 25/07/24 (and submission to DPHI on 25/07/24) failure to submit E57 report.	SBT: On 21/04/24 3 separate incidents of Sydney Earthworks-owned spoil haulage trucks entering Orchard Hills site between 6.30am-7am via Gate K3 on Kent Road. This resulted in a community stakeholder complaint being received on 22/04/24. This was reported to Sydney Metro and EPA and at the time CPBG investigated the complaint as to whether the three spoil trucks from Sydney Earthworks identified as coming into site prior to 07:00am constituted a non-compliance. On 29/04/24 this was confirmed. On 06/05/24 this was reported to the Department in accordance with A44/A45. The auditees are not aware of any response from the Department or EPA in relation to the matter. SBT removed one driver from site and warned the other two drivers. SCAW: On 25/07/24 SCAW identified that the E57 report prepared for was not submitted to the Department prior to the relevant OOHW commencing. This was notified on the same day of becoming aware.	C
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. Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Applicable	Applicable	Applicable	SBT Non-compliance report 21/04/24 (identified 29/04/24) and submission to DPHI 06/05/24 SCAW Non-compliance report 17/05/24 (and submission to DPHI on 19/08/24) failure to submit monitoring reports. SCAW Non-compliance report 25/07/24 (and submission to DPHI on 25/07/24) failure to submit E57 report.	The non-compliances identified by the auditees appear to have been reported to the Department in accordance with this condition.	C
Identification of Workforce							
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	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24 ER Monthly Reports for February – July 24	The markings on spoil trucks were sighted on the SBT inspection. No issues observed. SCAW has not been sending spoil off site during the audit period. The ER did not identify any material issues regarding truck stickers during the audit period.	C
A47	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 .	Applicable	Applicable	Applicable	https://www.sydneymetro.info/get-touch Site inspection 02, 05/08/24	Sites across the Project were observed to have signage in locations visible to the public containing the required information.	C
PART B – COMMUNITY INFORMATION AND REPORTING							
Community Information, Consultation and Involvement							
B1	The Overarching Community Communication Strategy as provided in the documents listed in Condition A1, or updated Strategy must be implemented for the duration of the work. Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.	Applicable	Applicable	Applicable	Sydney Metro interview 05-09/08/24 Overarching Community Communication Strategy, Sydney Metro, Rev 5, 31/07/24 (OCCS) and DPHI post approval portal lodgement 13/08/24 (submission of updated OCCS) https://www.sydneymetro.info/westernsydneyairportline https://www.sydneymetro.info/documents https://www.sydneymetro.info/news Sydney Metro LinkedIn and Facebook pages. Complaints register current to 16/08/24 CICG Meeting Minutes and Presentations, Mar - Jul 24	Sydney Metro are the primary managers of all communications across the Project. The contractors consult with agencies other than the Department, support consultation with the Department, provide information for community consultation, relay complaints and participate in community engagement forums as advised by Sydney Metro. The OCCS resides on the website and all AEW fall into the OCCS, where as the main contract works fall out via their stand-alone Community Communications Strategies. The OCCS was updated on 31/07/24. The SBT and SCAW Community Communication Strategies include requirements to implement a complaints management system, project updates and notifications, have a complaints mediator, briefing sessions. The documents are consistent with the Overarching Community Communication Strategy. Involvement is at the bequest of Sydney Metro. According to the auditees there has not been issue with sharing of information or representation of contractors in Sydney Metro community engagement.	C

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					<p>Penrith City Council Metro WSA Delivery Meeting Minutes, 15/04/24 and 23/07/24 (includes evidence of satisfaction with Kent Road and Phillip Street repairs)</p> <p>Sydney Metro Combined Community Notification Mock up (no date), shows proposed integrated approach for notifications.</p> <p>SBT interview 07-08/08/24</p> <p>SBT Community Communications Strategy, 02/01/24</p> <p>SBT Community Communications Strategy, Aerotropolis, 02/01/24</p> <p>SBT Community Communications Strategy, Bringelly, 02/01/24</p> <p>SBT Community Communications Strategy, St Marys, 02/01/24</p> <p>SBT Community Communications Strategy, Claremont Meadows, 02/01/24</p> <p>SBT Community Communications Strategy, Orchard Hills, 02/01/24</p> <p>SBT Community Communications Strategy, Tunnelling, 05/05/23</p> <p>Small Business Owners Engagement Plan, St Marys, 03/10/23</p> <p>https://www.sydneymetro.info/news</p> <p>https://www.youtube.com/watch?v=KW3icTegSZc</p> <p>SBT consultation manager online module</p> <p>SBT consultation tracker (current 08/08/24)</p> <p>SBT E57 report Aero TBM retrieval, May 24 (plus submission to EPA and ER, 27/05/24 and DPHI 27/05/24)</p> <p>SBT E57 report Orchard Hills Road works, March 24 (plus submission to EPA and ER, 18/03/24 and DPHI portal lodgement 18/03/24)</p> <p>SBT E57 report St Marys TBM retrieval, March 24 (plus submission to EPA and ER, 17/05/24 and DPHI portal lodgement 22/05/24)</p> <p>SBT E57 report Bringelly tunnelling, April 24 (plus DPHI portal lodgement 15/03/24)</p> <p>Meeting record, St Marys small business promotion, 29/07/24 (\$20 voucher program)</p> <p>SCAW interview 09/08/24</p> <p>SCAW Community Communications Strategy, 20/03/24</p> <p>SCAW Community Communications Strategy, Northern Project Region, 20/03/24</p> <p>SCAW Community Communications Strategy, Southern Project Region, 20/03/24</p> <p>https://caportal.com.au/cpb/smw-pudclp/virtual</p>	<p>Evidence was provided showing implementation of the Community Communications Strategy as follows:</p> <ul style="list-style-type: none"> Project updates on the Sydney Metro website Social media updates on Facebook and LinkedIn Complaints register and use of Consultation Manager Events such as those conducted at High School visits, cultural workshops, sponsorship of school, community information sessions, media events, fun with robots day school holiday program and STEM night at Glenmore Park High community benefit schemes such as snake awareness bushcare and fire safety, Mulgoa School shade umbrella, indigenous art experience, domestic violence control funding. Voucher programs Engagement records with local Council Communication Interface Coordination Group meeting information. 	

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW E57 report Luddenham Road round about pavement works, Rev A (and submission to EPA 29/04/24, DPPI on 29/04/24, ER on 24/04/24)</p> <p>SCAW E57 report Luddenham South Cosgrove Creek earthworks night, Rev 1 for OOHW permit 28 (and submission to EPA 20/05/24, DPPI on 20/05/24, ER on 14/05/24)</p> <p>SCAW E57 report viaduct works / Warragamba pipeline, rev 1 (and submission to ER on 22/07/24) (note this relates to the NC against E57).</p> <p>SCAW Community Benefit Initiatives Tracker 2024</p> <p>SCAW consultation manager online module and SCAW consultation manager extract – no date.</p>		
Complains Management System							
B2	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	Applicable	Applicable	Applicable	<p>Sydney Metro Complaints Management System, 31/07/24</p> <p>SBT consultation manager online module</p> <p>SCAW consultation manager online module</p> <p>Complaints register current to 16/08/24</p>	<p>Sydney Metro operates an overarching complaints register via the Consultation Manager platform. SBT and SCAW are also running Consultation Manager. The contractor complaints appear to be fed to Sydney Metro for consolidation.</p> <p>The data required under the OCCS and B4 has been captured.</p>	C
B3	<p>The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction:</p> <p>(a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI;</p> <p>(b) a postal address to which written complaints and enquires may be sent;</p> <p>(c) an email address to which electronic complaints and enquiries may be transmitted; and</p> <p>(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.</p>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>https://www.sydneymetro.info/westernsydneyairportline</p> <p>https://www.sydneymetro.info/website-accessibility</p> <p>https://www.sydneymetro.info/get-touch</p> <p>https://www.sydneymetro.info/documents</p> <p>https://www.sydneymetro.info/how-to-make-a-complaint</p> <p>SBT Community Communications Strategy, 02/01/24 (and subordinate plans – refer B1)</p> <p>SCAW Community Communications Strategy, 20/03/24 (and subordinate plans – refer B1)</p>	<p>Project signage is on each compound fence line, identifying the contact details as required by this condition. The Project works notifications includes contact details as required by this condition. Works updates are directly mailed to community via Australia Post. Complaint mediation system is described in the OCCS and each of the Community Communications Strategies. The auditees advise that if a complaint cannot be resolved, and the ER (or the Director of Communications) recommends mediation, this is escalated. The website includes a statement about how complaints are managed and the availability of mediation if required.</p>	C
B4	<p>A Complaints Register 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:</p> <p>(a) number of complaints received;</p> <p>(b) date and time of the complaint;</p> <p>(c) number of people (in the household) affected in relation to a complaint, if relevant;</p> <p>(d) method by which the complaint was made;</p> <p>(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;</p> <p>(f) issue of the complaint;</p> <p>(g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and</p> <p>(h) if no action was taken, the reason(s) why no action was taken.</p>	Applicable	Applicable	Applicable	<p>SBT consultation manager online module</p> <p>SCAW consultation manager online module</p> <p>Complaints register current to 16/08/24</p>	<p>Sydney Metro operates an overarching complaints register via the Consultation Manager platform. SBT and SCAW are also running Consultation Manager. The contractor complaints appear to be fed to Sydney Metro for consolidation.</p> <p>The Auditor observes that, during the audit period, SCAW received 3 complaints whereas SBT received 58.</p> <p>The data required under the OCCS and B4 has been captured.</p> <p>Of note is the application of avoidable/unavoidable classification of complaints. Sydney Metro Communications Team provide clarity on what is 'avoidable' or 'unavoidable' – in essence, if the Project is compliant, the works intended and the impact is within the terms of the approval a complaint is received, then the complaint is classified as 'unavoidable'.</p> <p>Observation: The Department requested that focus be provided on the completeness of the complaints register and the adequacy of actions taken to address/respond to complaints.</p> <p>The Auditor conducted a review of the Complaints Register (discussed further in Section 3.6) and completed a comparison</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
						<p>between a set of complaints in the register against the corresponding full files in Consultation Manager.</p> <p>SCAW and FSM entries (4 in total for the audit period) in the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate.</p> <p>SBT received 58 complaints during the audit period and by and large the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate. That being said, there are some isolated instances whereby the 'nature of the complaint' in the summary Complaints Register issued to interested parties could be further elaborated on to reflect the issue as described in Consultation Manager. For example:</p> <ul style="list-style-type: none"> On 20/06/24 SBT received a complaint and the Register states that the complaint related to 'truck complaint, Orchard Hills'. The corresponding Consultation Manager file identifies that the complainant raised concerns about heavy vehicle speeding, driver behaviour, revving engine and compression braking. On 18/06/24 SBT received a complaint and the Register states that the complaint related to 'vehicle damage'. The corresponding Consultation Manager file identifies that the complainant raised concerns about the condition of the road at Orchard Hills which (according to the complainant) caused her to crash her car (with the car towed and the driver assessed and cleared at hospital). On 26/03/24 SBT received a complaint and the Register states that the complaint relates to 'Vibration felt at property and crack formed within home.' The corresponding Consultation Manager file identifies that the complainant raised concerns about the TBM vibration and cracking on their driveway, plus interactions with previous contractors. On 23/03/24 SBT received a complaint and the Register states that the complaint relates to 'Dust and car wash good will offer.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) construction work causing dust which is getting onto their property and whether there is assistance provided to residents to counteract these affects like free car-washing. The file also indicates that the complaint relates to all packages at Orchard Hills (not just SBT). On 15/05/24 SBT received a complaint and the Register states that the complaint relates to 'Noise, property damage and rubbish on front of property.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) very noisy OOHW keeping them awake and that they have been noticing further cracks throughout the house (including in timber beams in the shed had a crack and also the laundry tiles). <p>Notwithstanding the above, the Auditor:</p> <ul style="list-style-type: none"> is of the view that the complaints were generally responded to in an adequate way. understands that Consultation Manager is the tool recording information on all touch points and inclusion of all details into a register that is meaningful to a broad audience is problematic the Department can request additional information on complaints received at any time and this information is available within Consultation Manager. 	
B5	<p>Complainants must be advised of the following information before, or as soon as practicable after, providing personal information:</p> <p>(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;</p> <p>(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies;</p>	Applicable	Applicable	Applicable	<p>https://www.sydneymetro.info/complaints-privacy-collection-notice</p> <p>https://www.sydneymetro.info/how-to-make-a-complaint</p> <p>Complaints register current to 16/08/24</p>	<p>The collection statement is available on the Sydney Metro website.</p> <p>The voicemail introduction to the complaints line and the email immediate response identifies that personal information will be recorded and managed in accordance with the Privacy and Personal Information Protection Act. And directs the complainant to the Collection Notice on the website for further information. The</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(c) the supply of personal information by the complainant is voluntary; and</p> <p>(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).</p> <p>The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.</p>				<p>1800 Phone call test 03/02/22 (at earlier audit)</p> <p>https://www.sydneymetro.info/westernsydneyairportline</p>	collection notice provides the relevant details in accordance with this condition.	
B6	<p>The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.</p> <p>Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties</p>	Applicable	Applicable	Applicable	DPHI post approval portal records, Feb – Jun 24 (issue of complaints register to DPHI)	Sydney Metro provide the complaints register to the Department on a weekly basis.	C
B7	<p>A Community Complaints Mediator 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 Overarching Community Communication Strategy</p>	Applicable	Applicable	Applicable (during construction)	<p>Overarching Community Communications Strategy, Sydney Metro, 05/08/20 and 12/04/21</p> <p>Letter Sydney Metro to Stephen Lancken, 14/12/21 (engagement of complaints mediator)</p>	Stephen Lancken has been appointed the complaints mediator for the Project.	C
B8	<p>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.</p>	Applicable	Applicable	Applicable	<p>Overarching Community Communications Strategy, Sydney Metro, 05/08/20 and 12/04/21</p> <p>Letter Sydney Metro to Stephen Lancken, 14/12/21 (engagement of complaints mediator)</p> <p>Sydney Metro interview 05-09/08/24</p> <p>Complaint Escalation and Summary Table, 146D Samuel Marsden Road, Orchard Hills, May 2023 (complaint log)</p> <p>Letter Sydney Metro to stakeholder at 146D Samuel Marsden Road, 11/05/23 (notification of escalation to mediator)</p> <p>Letter Sydney Metro to Complaints Mediator, 16/06/23</p> <p>Complaints Mediator Final Report for receiver at Samuel Marsden Drive, 18/12/23</p> <p>DPHI post approval portal lodgement 19/12/23 (Final Mediation Report for receiver at Samuel Marsden Drive)</p> <p>Occupancy Licence, receiver at Samuel Marsden Drive, (no date).</p>	Stephen Lancken has been appointed the complaints mediator for the Project. 1 x complaint had been escalated during the fourth audit period. The escalation process appears to have followed the process from the Overarching Community Communications Strategy, the Construction Complaints Management System; and conditions B2, B8, B9 of this Approval. Mediation has been undertaken during the audit period and a summary of the recommendations of the Community Complaints Mediator was provided to the Department on 19/12/23. The Mediator considered that the issues associated with mediation are closed. The auditees are not aware of any feedback having been received from the Department.	C
B9	<p>The Community Complaints Mediator will:</p> <p>(a) review any unresolved disputes, referred by the ER in accordance with the Overarching Community Communication Strategy;</p> <p>(b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and</p> <p>(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.</p>	Applicable	Applicable	Applicable	<p>Overarching Community Communications Strategy, Sydney Metro, 05/08/20 and 12/04/21</p> <p>Letter Sydney Metro to Stephen Lancken, 14/12/21 (engagement of complaints mediator)</p> <p>Sydney Metro interview 05-09/08/24</p> <p>Complaint Escalation and Summary Table, Receiver at Samuel Marsden Road, Orchard Hills, May 2023 (complaint log)</p> <p>Letter Sydney Metro to stakeholder at 146D Samuel Marsden Road, 11/05/23 (notification of escalation to mediator)</p> <p>Letter Sydney Metro to Complaints Mediator, 16/06/23</p>	<p>1 x complaint has been escalated to mediation from the fourth audit period, which then extended into this fifth audit period. The escalation process appears to have followed the process from the Overarching Community Communications Strategy, the Construction Complaints Management System; and conditions B2, B8, B9 of this Approval. Mediation has been undertaken during the audit period and a summary of the recommendations of the Community Complaints Mediator was provided to Department on 19/12/23. The Mediator considered that the issues associated with mediation are closed. The auditees are not aware of any feedback having been received from the Department.</p> <p>No complaints have been escalated during this audit period.</p>	NT

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					Complaints Mediator Final Report for receiver at Samuel Marsden Drive, 18/12/23 DPHI post approval portal lodgement 19/12/23 (Final Mediation Report for receiver at Samuel Marsden Drive)		
B10	Community Complaints Mediation will not be enacted before the Complaints Management System required by Condition B2 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.	Applicable	Applicable	Applicable (during construction)	Overarching Community Communications Strategy, Sydney Metro, 05/08/20 and 12/04/21 Letter Sydney Metro to Stephen Lancken, 14/12/21 (engagement of complaints mediator) Sydney Metro interview 05-09/08/24 Complaint Escalation and Summary Table, 146D Samuel Marsden Road, Orchard Hills, May 2023 (complaint log) Letter Sydney Metro to stakeholder at 146D Samuel Marsden Road, 11/05/23 (notification of escalation to mediator) Letter Sydney Metro to Complaints Mediator, 16/06/23 Letter Sydney Metro to Transport NSW notification of receipt of Post Approval Document SSI 10051 B9 SCAW Mediation Summary, dated 19/12/2023	Stephen Lancken has been appointed the complaints mediator for the Project. 1 x complaint had been escalated to mediation during the fourth audit period. The escalation process appears to have followed the process from the Overarching Community Communications Strategy, the Construction Complaints Management System; and conditions B2, B8, B9 of this Approval. Mediation has been undertaken during the audit period and a summary of the recommendations of the Community Complaints Mediator was provided to the Department on 19/12/23. The Mediator considered that the issues associated with mediation are closed. The auditees are not aware of any feedback having been received from the Department.	NT
Provision of Electronic Information							
B11	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: (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, license or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licenses 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. 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. All information required in this condition is to be provided on the website or webpage, and easy to navigate.	Applicable	Applicable	Applicable	https://www.cpbcon.com.au/en/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels https://www.cpbcon.com.au/en/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works https://www.quickway.com.au/projects/sydney-metro-western-sydney-airport-advanced-enabling-works/ https://www.laingorourke.com/projects/australia/st-marys-station-footbridge/ https://www.sydneymetro.info/documents https://www.sydneymetro.info/westernsydneyairportline https://www.sydneymetro.info/western-sydney-airport-line/environment-planning https://www.sydneymetro.info/station/st-marys-metro-station https://www.sydneymetro.info/station/claremont-meadows-intermediate-services-facility https://www.sydneymetro.info/station/orchard-hills-station https://www.sydneymetro.info/station/orchard-hills-stabling-and-maintenance-facility https://www.sydneymetro.info/station/luddenham-station https://www.sydneymetro.info/station/bringelly-services-facility https://www.sydneymetro.info/station/aerotropolis-station Email DPHI to Metro, 12/09/17 (DPHI agreement for the use of third party websites).	The information required under the Approval appears to all have been published on the Sydney Metro website or the websites of its contractors. The Auditor notes that the use of third party websites was agreed to by the Department in 2017 (as part of another Sydney Metro project) and has been applied consistently since. The Auditor is not aware of any direction from the Department stating otherwise. Sydney Metro, SBT and SCAW each have trackers identifying when documents are approved / endorsed, when works commenced and when the documents were published. Date of publication is also included in the AEW FSM website. As far as the Auditor can ascertain, the required documents are published within the required timeframe. It is noted that the complaints register is not made public, nor are contamination reports. Metro advises that contamination reports are proposed to be made public once redacted. Observation SBT: For SBT it was observed during the audit that: <ul style="list-style-type: none">the Noise and Vibration CEMP Sub-plan on the CPBG website does not include the accompanying Annexures (and these annexures do not appear to have been published elsewhere).the Aerotropolis Site Audit Reports / Site Audit Statements on the CPBG website were Section B (not Section A). This was rectified prior to the drafting of the Audit Report. Observation SCAW: For SCAW it was observed during the audit that the Communications Strategies on the CPBUII webpage were not the current versions. This was rectified prior to the drafting of the Audit Report.	C
PART C- CONSTRUCTION ENVIRONMENTAL MANAGEMENT							

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C1	<p>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.</p>	Applicable	Applicable	Applicable	<p>Construction Environmental Management Framework, Sydney Metro, Sep 2020</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>SBT Waste and Recycling Management Sub-Plan, 15/03/24, (SBT WRMSB) including licenses, procedures, and mitigation measures.</p> <p>Letter ER to Sydney Metro, 27/02/24 (ER endorsement of minor update to SBT NVMP, FFMP)</p> <p>Letter ER to Sydney Metro, 18/03/24 (ER endorsement of minor amendment to the SBT CEMP)</p> <p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Spoil Management Plan, 29/09/22</p> <p>SCAW Non-Aboriginal Heritage Sub-plan, 04/10/22 (SCAW NAHMP) including procedures and evidence of consultation</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>Letter DPHI to Sydney Metro, 30/06/23 (DPHI approval of updated FFMP, capturing updated Nest Box Strategy and minor amendments).</p> <p>SCAW Visual Amenity Management Plan, 19/10/22 (SCAW VAMP)</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Waste Management Sub-plan, 19/06/24 (SCAW WMP)</p>	<p>The CEMPs, Sub-plans and monitoring programs have been prepared in accordance with the CEMF and they identify how the performance outcomes, commitments and mitigation measures will be implemented and achieved during construction. The documents have been reviewed and endorsed by Sydney Metro and the ER and, where identified for approval by the Department under the Staging Report, have been approved by the Department prior to the commencing of the relevant construction works. Refer to earlier audit reports for ER endorsements and Department approvals (where required by the Staging Report) where these occurred prior to the current audit period.</p> <p>Refer to C10 and C21 regarding the implementation of the CEMP, Sub-plans and monitoring programs. Also, the ER has monitored the implementation of the documents (refer A32 for further details). The ER has raised actions in relation to environmental improvements on site, however the reports have not indicated failure to implement the CEMP and Sub-plans.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter ER to Sydney Metro, 15/03/24 (ER endorsement of minor amendment to FSM CEMP)</p>		
C2	<p>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.</p> <p>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.</p>	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Spoil Management Plan, 29/09/22</p> <p>SCAW Non-Aboriginal Heritage Sub-plan, 04/10/22 (SCAW NAHMP) including procedures and evidence of consultation</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>Letter DPHI to Sydney Metro, 30/06/23 (DPHI approval of updated FFMP, capturing updated Nest Box Strategy and minor amendments).</p> <p>SCAW Visual Amenity Management Plan, 19/10/22 (SCAW VAMP)</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Waste Management Sub-plan, 19/06/24 (SCAW WMP)</p>	<p>The Staging Report has established the approval pathway for each of the CEMP and Sub-plans on the Project (i.e.: identifying which CEMPs (and Sub-plans) are required to be endorsed by the ER and which require Department approval).</p> <p>All CEMPs are to be endorsed by the ER and do not require Departmental approval. All CEMPs relevant to the current audit period were endorsed prior to the relevant works package commencing. All were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p> <p>Letter DPHI to Sydney Metro, 12/01/2024 (DPHI acknowledgement of Rev3 CEMP)</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM CEMP)</p>		
C3	<p>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</p>	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Spoil Management Plan, 29/09/22</p> <p>SCAW Non-Aboriginal Heritage Sub-plan, 04/10/22 (SCAW NAHMP) including procedures and evidence of consultation</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>Letter DPHI to Sydney Metro, 30/06/23 (DPHI approval of updated FFMP, capturing updated Nest Box Strategy and minor amendments).</p> <p>SCAW Visual Amenity Management Plan, 19/10/22 (SCAW VAMP)</p>	<p>The Staging Report has established the approval pathway for each of the CEMP and Sub-plans on the Project (i.e.: identifying which CEMPs (and Sub-plans) are required to be endorsed by the ER and which require Department approval).</p> <p>All CEMPs are to be endorsed by the ER and do not require Departmental approval. All CEMPs relevant to the current audit period were endorsed prior to the relevant works package commencing. All were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C

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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.	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p>	Refer to C3 and C4. No CEMPs for stages of construction relevant to the current audit period are identified for Departmental approval under the Staging Report.	NT															
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 Subplan. 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>Note: CEMP Sub-plan(s) may reflect the construction of the project through geographical activities, 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	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration</p>	<p>The Staging Report identifies what Sub-plans are required for each stage of works.</p> <p>For AEW the Sub-plans listed in this condition have been identified under the Staging Report as being part of the relevant CEMP, rather than as a separate sub-plan.</p> <p>The Staging Report identifies that the SBT main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water. Non Aboriginal Heritage would form a procedure in the CEMP. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SBT main works prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water and Non-Aboriginal Heritage. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SCAW main works prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p> <p>Refer to earlier audit reports for details on consultation during each document's development, endorsement and submission and approval of each document.</p>	C
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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>	Applicable	Applicable	Applicable	<p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration</p>	The Auditor has reviewed the required Sub-plans and is of the view that these requirements have been satisfied.	C

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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.	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p>	<p>The Staging Report identifies what Sub-plans are required for each stage of works.</p> <p>For AEW the Sub-plans listed in this condition have been identified under the Staging Report as being part of the relevant CEMP, rather than as a separate sub-plan.</p> <p>The Staging Report identifies that the SBT main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water. Non Aboriginal Heritage would form a procedure in the CEMP. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SBT main works prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water and Non-Aboriginal Heritage. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SCAW main works prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C

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C8	<p>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.</p>	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p>	<p>The Staging Report identifies what Sub-plans are required for each stage of works.</p> <p>For AEW the Sub-plans listed in this condition have been identified under the Staging Report as being part of the relevant CEMP, rather than as a separate sub-plan.</p> <p>The Staging Report identifies that the SBT main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water. Non Aboriginal Heritage would form a procedure in the CEMP. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SBT main works prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil</p>	C

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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	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p>	The Staging Report identifies what Sub-plans are required for each stage of works.	C

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					<p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM CEMP)</p>		
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.	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP)</p> <p>SBT Spoil Management Sub-Plan, 14/03/24</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT Toolbox Talk register, Jan – August 24 (environmental toolbox talk register, showing 16 x enviro toolbox deliveries in last 8 months covering dust management, site hives, incidents, groundwater, TBM retrieval chemical storage, water discharge and OOHV)</p> <p>SBT internal environmental monthly reports March – July 24 (include SiteHive dust summaries and traffic light assessment of various environmental issues such as approvals, import approvals, OOHV approvals, consistency assessments, plan updates, resource recovery, compliance with the SSI and EPL, incidents, inspections, training).</p> <p>SBT weekly synergy reports (inspection register)</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT OOHV register, current to Aug 24</p> <p>SBT Permit application register (includes clearing, dewatering, 12x OOHV permits), current to July 24.</p> <p>SBT Groundborne noise monitoring report, Renzo Tonin, 30/05/24</p> <p>SBT Groundborne noise monitoring report (Derwent Road complaint response), Renzo Tonin, 09/07/24</p>	<p>The Staging Report identifies what Sub-plans are required for each stage of works.</p> <p>For AEW the Sub-plans listed in this condition have been identified under the Staging Report as being part of the relevant CEMP, rather than as a separate sub-plan.</p> <p>The Staging Report identifies that the SBT main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water. Non Aboriginal Heritage would form a procedure in the CEMP. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SBT main works prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require Sub-plans for Noise and Vibration, Flora and Fauna, Soil and Water and Non-Aboriginal Heritage. Evidence shows that the Sub-plans were prepared in accordance with this requirement for SCAW main works prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p> <p>Refer to earlier audit reports for details on consultation during each document's development, endorsement and submission and approval of each document.</p> <p>Evidence indicated that the CEMP and Sub-plans are for the most part being implemented. Training, inspections, monitoring is being implemented as per the CEMP and Sub-plans. Each contractor is running a system or file directory for the recording, actioning, escalation and close out of actions (inspections, monitoring, deficiency management, incident / non-compliance management). Deficiencies in controls / incident / non-compliances are being identified and actioned. Induction records, toolbox talks and prestarts and Work Packs indicate that Project teams are made aware of the requirements from the CEMP and Sub-plans relevant to the subject works.</p> <p>The ER Monthly Reports demonstrate that the ER is monitoring the implementation of the CEMP, Sub-plans and monitoring programs during the audit period.</p>	C

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					<p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT Plant sound power level monitoring results (no date)</p> <p>OOHW photos for Orchard Hills (permit 110) and St Marys TBM retrieval works.</p> <p>SBT time lapse photos (various)</p> <p>SBT Chek Rite online plant assessment module</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>SBT Aerotropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SBT Orchard Hills Section A Validation Report JBS&G 18/12/23 Site Audit Report and Statement, Ramboll 22/12/23</p> <p>SBT Material Importation Tracker and Aerotropolis tracker, current to August 2023</p> <p>SBT Material Importation Form and accompanying Material Classification Report, 07/10/22</p> <p>SBT Waste Disposal Site Approval Guidance, 08/09/22</p> <p>The Western Sydney Airport Tunnel Spoil RRO / RRE, 2023</p> <p>SBT Approved Waste Disposal Site Register, 22/02/24</p> <p>SBT Spoil Tracker Orchard Hills, 06/08/24</p> <p>SBT Spoil Tracker, Bringelly, 31/07/24</p> <p>SBT CMF Tracker, 31/07/24</p> <p>S143 statements, Light Horse Interchange 09/03/22, Cornwallis Road 01/06/23, JKW development, 13/12/22, Kemps Creek Warehouse 26/09/22, Nepean Business Park 4/11/21, Gipps Street 16/01/23, Brandown 23/07/24, Penrith Lakes 23/05/24 & 18/06/24 and associated consents and letters as relevant.</p> <p>SBT Bingo Waste Report Mar – Aug 24, plus list of tip sites</p> <p>Claremont Meadows Waste Classification Report, Neo, 12/07/24</p> <p>SBT ERSED Plans for St Marys TBM retrieval (Rev01), Orchard Hills (Rev 11), Bringelly (Rev 01), Claremont Meadows (01/02/24).</p>		

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW Construction Environment Management Plan (SCAW CEMP), 29/07/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Spoil Management Plan, 29/09/22</p> <p>SCAW Non-Aboriginal Heritage Sub-plan, 04/10/22 (SCAW NAHMP) including procedures and evidence of consultation</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>Letter DPHI to Sydney Metro, 30/06/23 (DPHI approval of updated FFMP, capturing updated Nest Box Strategy and minor amendments).</p> <p>SCAW Visual Amenity Management Plan, 19/10/22 (SCAW VAMP)</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Waste Management Sub-plan, 19/06/24 (SCAW WMP)</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>SCAW toolbox talks 20/03/24, 17/04/24, 05/04/24 (covering fire ants, refuelling, smoking/littering, truck driver behaviour, ERSED)</p> <p>SCAW synergy SHEQ system (online)</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW dust deposition results, current March – July 24 SCAW pre-clearing inspection, permit and post clearing permits (April – July 24)</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>SCAW OOHW permit register, 24 - 43, current to 09/08/24 and associated OOHW permits and monitoring records .</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>SCAW Monster Monthly Data tracker, current to 09/08/24</p> <p>SCAW Sandstone Import Tracker current to 18/08/24</p> <p>SCAW Office Waste Tracking Register, current to 31/07/24</p>		

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					<p>SCAW Waste disposal facility environment protection licences: EPL 12168, EPL 1342, EPL 114976, EPL 20855, EPL 21389, EPL 21577, EPL 21421</p> <p>SCAW Austip Recycling Monthly Reports, Mar – Jun 24 and EPL 21421 (Riverstone storage and recovery centre), plus of final recovery / disposal sites.</p> <p>SCAW Waste Classification Report, gate 9, Sydney Environmental, 26/06/24 (ACM waste classification) and ACM tip dockets 28/06/24 - 02/07/24</p> <p>SCAW Waste Classification Report, AEC31a, Sydney Environmental, 06/06/24 (ACM and RSW); EPA consignment authorization 18 and 19/07/24 and associated dockets (Cleanaway 18 and 19/07/24); ACM tip dockets 18 and 19/07/24.</p> <p>SCAW Erosion and Sediment Control Plans (ERSED Plan) Luddenham Road to Pipeline Rev 09, Elizabeth Drive Compound Rev 10, Paton's Lane to Lansdowne Rev6, Defence Rev04.</p> <p>SCAW Dewater and Discharge Permits (81- 124) (current to 30/07/24) and discharge register with all results compliant with criteria)</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM CEMP)</p>		
C11	<p>In addition to the relevant requirements of the CEMF, the Flora and Fauna CEMP Sub-plan must include but not be limited to:</p> <p>(a) details of how the requirements of Conditions E11 will be met;</p> <p>(b) details of a dewatering plan of farm dams including:</p> <ul style="list-style-type: none"> (i) supervision of dewatering by a suitably qualified ecologist; (ii) a methodology for the transfer of native fauna species known to inhabit and/or use the dam; (iii) the location and suitability of the proposed relocation sites; and (iv) any potential impacts of relocating the fauna to the relocation sites; <p>(c) protocols for incidental finds of threatened species and ecological communities within the construction boundary</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p>	The Auditor has reviewed the SBT and SCAW FFMPs and considers that they adequately address the requirements of this condition as relevant.	C
C12	<p>In addition to the relevant requirements of the CEMF, the Soil and Water CEMP Sub-Plan must include but not be limited to:</p> <p>(a) details how the requirements of Conditions E127, E128 and E129 will be met; and</p> <p>(b) the unexpected, contaminated finds protocol required by Condition E98.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p>	The Auditor has reviewed the SBT and SCAW SWMPs and considers that they adequately address the requirements of this condition as relevant.	C
Construction Monitoring Programs							

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C13	<p>The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as required by Condition A6) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP. 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 Construction Monitoring Programs</th> <th>Relevant government agencies to be consulted for each Construction Monitoring Program</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Noise and vibrations</td> <td>Relevant Councils and WaterNSW (in relation to its assets)</td> </tr> <tr> <td>(b)</td> <td>Surface water quality</td> <td>DPIE Water, DPI Fisheries, and Relevant Councils</td> </tr> <tr> <td>(c)</td> <td>Groundwater</td> <td>DPIE Water</td> </tr> <tr> <td>(d)</td> <td>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 vibrations	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	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>The Staging Report identifies what monitoring programs are required for each stage of works.</p> <p>For AEW the monitoring requirements listed in this condition have been identified under the Staging Report as being part of the relevant CEMP (or not relevant at all), rather than as a separate document.</p> <p>The Staging Report identifies that the SBT main works would require monitoring programs for Noise and Vibration, Surface Water, Groundwater and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Groundwater Monitoring Programs required Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period. Refer to earlier audit reports for details on consultation, endorsement and approval that occurred prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require monitoring programs for Noise and Vibration, Surface Water and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Surface Water monitoring programs require Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period. Refer to earlier audit reports for details on consultation, endorsement and approval that occurred prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C
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(a)	Noise and vibrations	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	<p>Each Construction Monitoring Program must provide:</p> <p>(a) details of baseline data available including the period of baseline monitoring;</p> <p>(b) details of baseline data to be obtained and when;</p> <p>(c) details of all monitoring of the project to be undertaken;</p> <p>(d) the parameters of the project to be monitored;</p> <p>(e) the frequency of monitoring to be undertaken;</p> <p>(f) the location of monitoring;</p> <p>(g) the reporting of monitoring results and analysis results against relevant criteria;</p> <p>(h) details of the methods that will be used to analyse the monitoring data;</p> <p>(i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts;</p> <p>(j) a consideration of SMART principles;</p> <p>(k) any consultation to be undertaken in relation to the monitoring programs; and</p> <p>(l) any specific requirements as required by Conditions C15 to C16.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>The Auditor has reviewed the monitoring programs and is of the view that the requirements from the condition have been satisfied as relevant.</p>	C															

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C15	<p>The Noise and Vibration Construction Monitoring Program must include:</p> <p>(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;</p> <p>(b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken;</p> <p>(c) method and frequency for reporting monitoring results; and</p> <p>(d) a process to undertake real time noise and vibration monitoring.</p> <p>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.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>https://www.sydneymetro.info/documents</p> <p>https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels</p> <p>https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p>	<p>The Auditor has reviewed the monitoring programs and is of the view that the requirements from the condition have been satisfied as relevant.</p> <p>Results are available online.</p>	C
C16	<p>Groundwater Construction Monitoring Program must include:</p> <p>(a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1;</p> <p>(b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality;</p> <p>(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;</p> <p>(d) results from existing monitoring bores;</p> <p>(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;</p> <p>(f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users;</p> <p>(g) daily measurement of the amount of water discharged from the water treatment plants;</p> <p>(h) water quality testing of the water discharged from treatment plants;</p> <p>(i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems;</p> <p>(j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source;</p> <p>(k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and</p> <p>(l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p>	<p>The Auditor has reviewed the monitoring programs and is of the view that the requirements from the condition have been satisfied as relevant.</p>	C
C17	<p>With the exception of any Construction Monitoring Programs expressly nominated by the Planning Secretary to be endorsed by the ER, all Construction Monitoring Programs must be submitted to the Planning Secretary for approval.</p>	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p>	<p>The Staging Report identifies what monitoring programs are required for each stage of works.</p> <p>For AEW the monitoring requirements listed in this condition have been identified under the Staging Report as being part of the relevant CEMP (or not relevant at all), rather than as a separate document.</p> <p>The Staging Report identifies that the SBT main works would require monitoring programs for Noise and Vibration, Surface Water, Groundwater and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Groundwater Monitoring Programs required Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require monitoring programs for Noise and Vibration, Surface Water and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Surface Water monitoring programs require Department approval. Endorsement and approval was</p>	C

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					<p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	
C18	The Construction Monitoring Programs 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 Construction Monitoring Programs 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	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>The Staging Report identifies what monitoring programs are required for each stage of works.</p> <p>For AEW the monitoring requirements listed in this condition have been identified under the Staging Report as being part of the relevant CEMP (or not relevant at all), rather than as a separate document.</p> <p>The Staging Report identifies that the SBT main works would require monitoring programs for Noise and Vibration, Surface Water, Groundwater and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Groundwater Monitoring Programs required Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require monitoring programs for Noise and Vibration, Surface Water and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Surface Water monitoring programs require Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C
C19	The Construction Monitoring Programs 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 Construction Monitoring Programs 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	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p>	<p>The Staging Report identifies what monitoring programs are required for each stage of works.</p> <p>For AEW the monitoring requirements listed in this condition have been identified under the Staging Report as being part of the relevant CEMP (or not relevant at all), rather than as a separate document.</p> <p>The Staging Report identifies that the SBT main works would require monitoring programs for Noise and Vibration, Surface Water, Groundwater and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Groundwater Monitoring Programs required Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>The Staging Report identifies that the SCAW main works would require monitoring programs for Noise and Vibration, Surface Water and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Surface Water monitoring programs require Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</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 Construction Monitoring Programs and all relevant baseline data for the specific construction activity has been collected.	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p>	<p>The Staging Report identifies what monitoring programs are required for each stage of works.</p> <p>For AEW the monitoring requirements listed in this condition have been identified under the Staging Report as being part of the relevant CEMP (or not relevant at all), rather than as a separate document.</p> <p>The Staging Report identifies that the SBT main works would require monitoring programs for Noise and Vibration, Surface Water, Groundwater and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Groundwater Monitoring Programs required Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>The Staging Report identifies that the SCAW main works would require monitoring programs for Noise and Vibration, Surface Water and Air Quality. All are required to be endorsed by the ER. Only the Noise and Vibration and Surface Water monitoring programs require Department approval. Endorsement and approval was granted prior to the commencement of the relevant works and prior to the current audit period.</p> <p>All plans were endorsed prior to the current audit period, with only minor amendments occurring during the audit period. Note that several plans were in the process of being updated and endorsed at the time of the audit.</p>	C
C21	The Construction Monitoring Programs , 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.	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p>	<p>At this stage SBT and SCAW have demonstrated that they are implementing the monitoring required at this stage of their works as is required under the monitoring programs. The AEW packages do not have monitoring programs (as per approved Staging Report).</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SBT Groundwater Monitoring Report, July – November 23, 29/01/24</p> <p>SBT Surface Water Monitoring Report, Nov 23 – Apr 24, June 24</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>https://www.sydneymetro.info/documents</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation, revised in response to Sydney Metro and ER comments on Rev2</p> <p>Letter HBI to Sydney Metro, 19/12/23 (ER endorsement of updated SCAW CEMP, AQMP, NVMP, SWMP)</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>ER Monthly Reports for February – July 24</p>		
C22	<p>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</p> <p>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT NSW (Off-Airport) Soil and Water Management Sub-Plan, 15/08/24 (SBT SWMP) including Surface Water Monitoring Program, Procedures</p> <p>SBT groundwater monitoring program 21/09/22</p> <p>Letters HBI to Sydney Metro, 27/02/24, (ER endorsement of update to SBT NVMP and FFMP)</p> <p>SBT Groundwater Monitoring Report, July – November 23, 29/01/24</p> <p>SBT Surface Water Monitoring Report, Nov 23 – Apr 24, June 24 (plus submission to ER 28/06/24 and DPHI response 11/07/24)</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24 (plus submission to ER 28/06/24 and DPHI response 11/07/24)</p> <p>https://www.sydneymetro.info/documents</p> <p>https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels</p>	<p>According to the records sighted, the Monitoring Reports have been submitted and made publicly available in line with the requirements of this condition.</p> <p>An updated monitoring program and Off-Airport Sub-Plan was prepared on 22/02/24 which removed the obligation to submit the 6-monthly monitoring report to the EPA (due to the EPA already receiving the EPL monthly reports). The ER formally endorsed the updated documents on 15 August 2024. The updated Program and sub-plan are publicly available on the CPBG website.</p> <p>Non-compliance SCAW: On 15/05/24 SCAW identified via an internal audit a non-compliance has with Section 5.5 of the SM-WSA SCAW Surface Water Monitoring Program (SWMonP), and Section 7.2 of the SM-WSA SCAW Noise and Vibration Monitoring Program (NVMonP). This was a result of the submission provision of the 6 Monthly Construction Monitoring report to nominated recipients within 60 days of the reporting period. The 6 Monthly Construction Monitoring Report #2 issued to DPE and published on the SCAW Website on the 21/12/23 was not reported as being available for information to the EPA or PCC in accordance with the nominated recipients list in the monitoring programs. As the report was publicly available on the project website and based on consultation with Sydney Metro and the ER, an internal Non-Conformance was raised against the CEMP and submitted to Sydney Metro on 17/05/24. Sydney Metro state that on further reflection following this sixth Independent Audit in August 2024, it was identified that the Non-Conformance may possibly be a Non-Compliance with C22 and the decision was</p>	NC

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status									
					<p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Soil and Water Management Sub-plan, 30/07/24 (SCAW SWMP) including surface water quality monitoring program, procedures and evidence of consultation</p> <p>SCAW Air Quality Management Subplan, 30/07/24 (SCAW AQMP) including air quality monitoring program, procedures and evidence of consultation, revised in response to Sydney Metro and ER comments on Rev2</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW dust deposition results, current March – July 24SCAW pre-clearing inspection, permit and post clearing permits (April – July 24)</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>SCAW OOHW permit register, 24 - 43, current to 09/08/24 and associated OOHW permits and monitoring records .</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>SCAW Non-compliance report 17/05/24 (and submission to DPHI on 19/08/24) failure to submit the 6-monthly compliance report 2 to EPA and PCC.</p> <p>DPHI post approval portal 27/06/24 (submission of 6-monthly compliance report 3 to DPHI), plus email SCAW to EPA and PCC 28/06/24 (submission of 6-monthly compliance report 3 to EPA and PCC).</p>	made to update to a Non-Compliance Report and issue to the Department on 19/08/24.										
PART D – OPERATIONAL ENVIRONMENTAL MANAGEMENT																
Operational Environmental Management																
D1	An Operational Environmental Management Plan (OEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department Planning, Industry and Environment 2020). The OEMP must detail how the performance outcomes, commitments and mitigation measures made and identified in the documents listed in Condition A1 will be implemented and achieved during operation. This condition (Condition D1) does not apply if Condition D2 of this approval applies.	Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT									
D2	An OEMP is not required for the CSSI if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the EMS or equivalent: (a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and specified relevant terms of this approval can be achieved; (b) issues identified through ongoing risk analysis can be managed; and (c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.	Not Applicable	No Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT									
D3	Where an OEMP is required, the Proponent must include the following OEMP Sub-plans in the OEMP: <table border="1" data-bbox="246 1738 1344 1890"> <thead> <tr> <th></th> <th>Required OEMP Sub-Plan</th> <th>Relevant government agencies to be consulted for each OEMP Sub-Plan</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Groundwater Management</td> <td>DPIE Water</td> </tr> <tr> <td>(b)</td> <td>Bushfire Management Plan</td> <td>NSW Rural Fire Service</td> </tr> </tbody> </table>		Required OEMP Sub-Plan	Relevant government agencies to be consulted for each OEMP Sub-Plan	(a)	Groundwater Management	DPIE Water	(b)	Bushfire Management Plan	NSW Rural Fire Service	Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
	Required OEMP Sub-Plan	Relevant government agencies to be consulted for each OEMP Sub-Plan														
(a)	Groundwater Management	DPIE Water														
(b)	Bushfire Management Plan	NSW Rural Fire Service														

Unique ID	Compliance requirement		SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(c)	Flood Emergency Management Plan	EES Group, DPIE Water, SES and Relevant Councils					
D4	Each of the OEMP Sub-plans must include the information set out in Condition D2 of this approval.		Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
D5	The OEMP Sub-plans must be developed in consultation with relevant government agencies as identified in Condition D3 and must include information requested by an agency to be included in an OEMP Sub-plan during such consultation. Details of all information requested by an agency to be included in an OEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant OEMP Sub-Plan .		Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
D6	The OEMP Sub-plans must be submitted to the Planning Secretary as part of the OEMP		Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
D7	The OEMP or EMS or equivalent as agreed with the Planning Secretary, must be submitted to the Planning Secretary for information no later than one (1) month before the commencement of operation.		Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
D8	The OEMP or EMS or equivalent, as submitted to the Planning Secretary and amended from time to time, must be implemented for the duration of operation or as agreed with the Planning Secretary. The OEMP or EMS or equivalent must be made publicly available before the commencement of operation.		Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction	NT
PART E – KEY ISSUE CONDITIONS								
Air Quality								
E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction		Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>ER Monthly Reports for February – July 24</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT Toolbox Talk register, Jan – August 24 (environmental toolbox talk register, showing 16 x enviro toolbox deliveries in last 8 months covering dust management, site hives, incidents, groundwater, TBM retrieval chemical storage, water discharge and OOHV)</p> <p>SBT internal environmental monthly reports March – July 24 (include SiteHive dust summaries and traffic light assessment of various environmental issues such as approvals, import approvals, OOHV approvals, consistency assessments, plan updates, resource recovery, compliance with the SSI and EPL, incidents, inspections, training).</p> <p>SBT weekly synergy reports (inspection register)</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW SiteHive module (online)</p> <p>SCAW Erosion and Sediment Control Plans (ERSED Plan) Luddenham Road to Pipeline Rev 09, Elizabeth Drive Compound Rev 10, Paton's Lane to Lansdowne Rev6, Defence Rev04.</p> <p>SCAW dust deposition results, current March – July 24</p>	<p>SBT appears to have implemented relevant controls from the CEMP and Sub-plans to minimize dust. This includes use of water, soil binders and prioritization of stabilized and building hardstand areas. Dust management has been communicated to the workforce. SiteHive units have recorded dust at each compound, with SBT attributing spikes to humidity / moisture and not dust (or genuine spikes do not appear to correlate to work hours). SBT inspection reports include a requirement to confirm that dust suppression measures are in place. No material issues recorded. Bringelly was in the process of establishing hard stand and spoil haulage was complete prior to the audit site inspection.</p> <p>SCAW appears to have implemented relevant controls from the CEMP and Sub-plans to minimize dust. SCAW is monitoring deposited dust and real time dust via SiteHive. Results are adequate (noting however some very large spikes in dust on the SiteHive, which appears to be attributable to moisture/humidity). Erosion and sediment control plans have been implemented which has a positive influence on air quality. Dust management has been communicated to the workforce via the induction.</p> <p>4x air quality complaints were recorded during the audit period.</p>	C
Biodiversity and Trees								

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT Hydrogeological Interpretive Report, (040403) (shows PCTs and consideration of site layout)</p> <p>SBT Site Establishment design report Bringelly (PKG 051001), and Orchard Hills (031801)</p> <p>SBT Permit to Clear, (permits 022 - 024)</p> <p>SBT interview 07-08/08/24</p> <p>SBT pre-clearance inspection Orchard Hills South (offset variations), 12/10/22</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22).</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>SCAW GIS module (online)</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22 and 12/10/22</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 17/05/23</p> <p>Letter Sydney Metro to DPHI, 14/08/23 (conditions E4, E5, E7 – evidence of updated credit retirement)</p> <p>DPHI post approval portal lodgement, 15/08/23 (submission of updated credit retirement)</p> <p>SCAW pre-clearing inspection, permit and post clearing permits (April – July 24)</p> <p>AEW FSM Arboricultural Impact Assessment, Tree Report Arboricultural Consulting, August 2023.</p>	<p>The SBT site establishment design reports show that site configurations and layouts have been developed with the view that native vegetation is retained. The native vegetation overlay has been used in the site establishment decision making process. There has been no material change to the site establishment footprints. The SBT permit to clear process is such that clearing is marked and controlled so that no additional impacts to that intended are carried out (i.e.: no clearing beyond specified area), that relevant credits have been retired (where necessary). The last round of clearing was conducted prior to the current audit period. SBT does not anticipate any further clearing of native vegetation, if this is the case then this requirement can be considered closed for SBT.</p> <p>The SCAW design has been refined so that only land required to build the project has been accounted for. However, updates to ecosystem credit retirements have been required to account for canopy cover that traverses the construction footprint. A revised ecosystem credit retirement was completed prior to the audit period. The new credits were retired prior to the relevant clearing occurring and remains below the total requirements approved by the Department and that specified in E4. The SCAW permit to clear process is such that clearing is marked and controlled so that no additional impacts to that intended are carried out (i.e.: no clearing beyond specified area), that relevant credits have been retired (where necessary). The clearing process is consistent with the approved FFMP.</p> <p>AEW FSM removed 17 x landscaping/planted trees during earlier audit periods, of which all but two were designated as medium value or below. The 2 x high value trees were dead (according to the arborist). The justifications for removal were either for permanent works or for access by the cranes (if cranes could not access the area then the alternative is that the carpark access be closed for each possession (and one week before and after)). The area is subject to landscaping post construction which will include planting. Note that this requirement is considered not applicable to FSM under the Staging Report. Sydney Metro and the ER both approved the removal of the trees. No further tree removal occurred during the audit period.</p> <p>Metro have provided evidence that the construction footprint is greater than the clearing footprint (i.e.: demonstrating that clearing has been minimized).</p> <p>Condition E4 was modified to reduce the number of ecosystem credits to be retired, demonstrating that the clearing footprint has been reduced.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E3	Impacts to plant community types must not exceed those identified in the documents listed in Condition A1 , 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.	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Flora and Fauna Management Sub-plan, 20/02/24 (SBT FFMP)</p> <p>SBT Hydrogeological Interpretive Report, (040403)</p> <p>SBT Site Establishment design report Bringelly (PKG 051001), and Orchard Hills (031801)</p> <p>SBT Permit to Clear, (permits 022 - 024)</p> <p>DPHI post approval portal lodgment 12/08/22 (retirement of ecosystem credits at Orchard Hills)</p> <p>SBT pre-clearance inspection Orchard Hills South (offset variations), 12/10/22</p> <p>SBT interview 07-08/08/24</p> <p>SBT pre-clearance inspection Orchard Hills South (offset variations), 12/10/22</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22).</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>SCAW GIS module (online)</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22 and 12/10/22</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 17/05/23</p> <p>Letter Sydney Metro to DPHI, 14/08/23 (conditions E4, E5, E7 – evidence of updated credit retirement)</p> <p>DPHI post approval portal lodgement, 15/08/23 (submission of updated credit retirement)</p> <p>SCAW pre-clearing inspection, permit and post clearing permits (15 events), Aug 23 – November 23</p> <p>Sydney Metro interview 05-09/08/24</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22)</p> <p>Letter DPHI to Sydney Metro, 04/11/22 (acknowledgement of evidence of the retirement of credits or payment to secure offsets to Department (E3))</p> <p>Letter DPHI to Sydney Metro, 18/11/22 (acknowledgement of evidence to demonstrate that biodiversity credits have been retired prior to removal of native vegetation associated with the SCAW construction stage as required under condition E4))</p> <p>Sydney Metro SMWSA Offset tracker, current to 27/07/23 (parent tracker)</p> <p>Letter DPHI to Sydney Metro, 23/05/23 (approval to retire additional ecosystem credits as per E3 and E4 for Dilwinia and Pulteneae)</p>	<p>Refer above.</p> <p>The SBT and SCAW permit to clear process is such that clearing is marked and controlled so that no additional impacts to that intended are carried out (i.e.: no clearing beyond specified area), that relevant credits have been retired (where necessary). The pre-clearing permit includes a review of the land being taken.</p> <p>Metro have demonstrated that ecosystem credits have been retired prior to clearing of the relevant vegetation, and the number of credits used (i.e.: amount of vegetation used). The credits retired to do not exceed the amount specified in the EIS, and the Department has granted approval for the departure of clearing from E4.</p> <p>The only clearing on SBT attracting additional credit retirements were the Dillwynia and Pulteneae cleared at orchard Hills in preparation for SSTOM. Evidence shows that clearing did not commence until after evidence of BCF retirement had been submitted to the Department. The work was completed prior to the current audit period.</p> <p>SBT and SCAW do not anticipate any further clearing of PCT, if this is the case then this requirement can be considered closed for SBT and SCAW.</p>	C

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E4	<p>As modified through MOD-1 (approved 14/04/22)</p> <p>Prior to impacts on the biodiversity values set out in Table 3 and Table 4, the number and classes of ecosystem credits and species credits (like-for-like) must be retired.</p> <p>Note: Credits have been calculated using the Biodiversity Assessment Method.</p> <p>Table 3: Ecosystem credits</p> <table border="1"> <thead> <tr> <th>Plant Community Type (PCT) ID and name</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td>724: Broad-leaved Ironbark – Grey Box - 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>849: Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion</td> <td>202 204</td> </tr> <tr> <td>1800: Swamp Oak open forest on riverflats of Cumberland Plain and Hunter Valley</td> <td>181</td> </tr> <tr> <td>Total</td> <td>846 848</td> </tr> </tbody> </table> <p>Table 4: Species credits required</p> <table border="1"> <thead> <tr> <th>Species</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td>Acacia bynoeana (Bynoe's Wattle)</td> <td>31</td> </tr> <tr> <td>Acacia pubescens (Downy Wattle)</td> <td>54</td> </tr> <tr> <td>Allocasuarina glareicola</td> <td>47</td> </tr> <tr> <td>Cynanchum elegans (White-flowered Wax Plant)</td> <td>18</td> </tr> <tr> <td>Dillwynia tenuifolia</td> <td>21 72</td> </tr> <tr> <td>Grevillea juniperina subsp. juniperina (Juniper-leaved Grevillea)</td> <td>57 153</td> </tr> <tr> <td>Grevillea parviflora subsp. parviflora (Small-flower Grevillea)</td> <td>32</td> </tr> <tr> <td>Marsdenia viridiflora subsp. viridiflora (Endangered population Marsdenia viridiflora R. 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The staged approach is consistent with the Staging Report.</p> <p>SBT and SCAW do not anticipate any further clearing of PCT, if this is the case then this requirement can be considered closed for SBT and SCAW.</p>	C
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	Myotis Macropus (Southern Myotis)	292				Letter DPHI to Sydney Metro, 18/11/22 (acknowledgement of evidence to demonstrate that biodiversity credits have been retired prior to removal of native vegetation associated with the SCAW construction stage as required under condition E4))		
	Total Species Credit	539 4443				Letter DPHI to Sydney Metro, 23/05/23 (approval to retire additional ecosystem credits as per E3 and E4 for Dilwinia and Pultenea)		
						Letter Sydney Metro to DPHI 15/06/23 (submission of Dillwynia and Pultenea ecosystem retirement evidence (provision of BCF certificate to DPHI, under E7))		
						Letter DPHI to Sydney Metro, 28/06/23 (DPHI acknowledgement of BCF payment)		
E5	The requirement to retire like-for-like ecosystem credits and species credits in Condition E4 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.		Applicable	Applicable	Applicable	<p>Letter Metro to DPHI and DPHI post approval portal lodgment 12/08/22 (retirement of ecosystem credits at Orchard Hills)</p> <p>SBT pre-clearance inspection Orchard Hills South (offset variations), 12/10/22</p> <p>SBT pre-clearance inspection Orchard Hills South (offset variations), 12/10/22</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22).</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22</p> <p>SCAW DPHI portal lodgment, 10/11/22 (submission of evidence of credit retirement)</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22, associated evidence)</p> <p>Letter DPHI to Sydney Metro, 04/11/22 (acknowledgement of evidence of the retirement of credits or payment to secure offsets to Department (E3))</p> <p>Letter DPHI to Sydney Metro, 18/11/22 (acknowledgement of evidence to demonstrate that biodiversity credits have been retired prior to removal of native vegetation associated with the SCAW construction stage as required under condition E4))</p> <p>Letter DPHI to Sydney Metro, 23/05/23 (approval to retire additional ecosystem credits as per E3 and E4 for Dilwinia and Pultenea)</p> <p>Letter Sydney Metro to DPHI 15/06/23 (submission of Dillwynia and Pultenea ecosystem retirement evidence (provision of BCF certificate to DPHI, under E7))</p> <p>Letter DPHI to Sydney Metro, 28/06/23 (DPHI acknowledgement of BCF payment)</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22 and 12/10/22</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 17/05/23</p> <p>Letter Sydney Metro to DPHI, 14/08/23 (conditions E4, E5, E7 – evidence of updated credit retirement)</p>	The evidence provided shows that retirement has been completed via payment into the trust. SBT and SCAW do not anticipate any further clearing of PCT, if this is the case then this requirement can be considered closed for SBT and SCAW.	C

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					DPHI post approval portal lodgement, 15/08/23 (submission of updated credit retirement)		
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)	Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 23/05/23 (approval to retire additional ecosystem credits as per E3 and E4 for Dilwinia and Pultenea)</p> <p>Letter Sydney Metro to DPHI 15/06/23 (submission of Dillwynia and Pultenea ecosystem retirement evidence (provision of BCF certificate to DPHI, under E7))</p> <p>Letter DPHI to Sydney Metro, 28/06/23 (DPHI acknowledgement of BCF payment)</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22 and 12/10/22</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 17/05/23</p> <p>Letter Sydney Metro to DPHI, 14/08/23 (conditions E4, E5, E7 – evidence of updated credit retirement)</p> <p>DPHI post approval portal lodgement, 15/08/23 (submission of updated credit retirement)</p> <p>SCAW pre-clearing inspection, permit and post clearing permits (15 events), Aug 23 – November 23</p>	<p>This has been adopted for Dillwynia and Pultenea ecosystem retirement. This was reported to the Department prior to the clearing of these species and was accepted by the Department on 28/06/23 (prior to the current audit period). Updated credit retirement completed for SCAW during the fifth audit period did not trigger this requirement.</p> <p>SBT does not anticipate any further clearing of native vegetation, if this is the case then this requirement can be considered closed for SBT.</p>	C
E7	Evidence of the retirement of credits in satisfaction of Condition E4 or payment to the Biodiversity Conservation Fund in satisfaction of Condition E5 must be provided to the Planning Secretary prior to impacts on the biodiversity values	Applicable	Applicable	Applicable	<p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits for SCAW, associated evidence), and DPHI portal lodgement 10/11/22</p> <p>Letter Metro to DPHI, 12/08/22 evidence of retirement of ecosystem credits for SBT, associated evidence and DPHI post approval portal lodgement, 16/08/22</p> <p>Letter Metro to DPHI, 10/11/22 (evidence of retirement of ecosystem credits as at 31/11/22).</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 01/09/22 and 12/10/22</p> <p>SCAW Revised Biodiversity Credit Requirements, AMBS, 17/05/23</p> <p>Letter Sydney Metro to DPHI, 14/08/23 (conditions E4, E5, E7 – evidence of updated credit retirement)</p> <p>DPHI post approval portal lodgement, 15/08/23 (submission of updated credit retirement)</p> <p>SCAW pre-clearing inspection, permit and post clearing permits (15 events), Aug 23 – November 23</p>	<p>Confirmation of retirement of credit requirements for AEW, SBT and SCAW were completed and submitted prior to the relevant clearing works. Refer to previous audit reports for details.</p> <p>Revised credit retirements for SCAW completed during the fifth audit period were completed prior to clearing of the subject vegetation.</p> <p>SBT does not anticipate any further clearing of native vegetation, if this is the case then this requirement can be considered closed for SBT.</p>	C
E8	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in Policy and Guidelines for Fish Habitat Conservation and Management (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 Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update) and in consultation with DPI Fisheries.	Applicable	Applicable	Not Applicable	<p>Site inspection 02, 05/08/24</p> <p>SCAW EWMS, Waterway Crossings 003, 01/03/23</p> <p>SCAW propellor online module (drone photos) 28/04/23</p> <p>Letter DPI Fisheries to SCAW, 10/03/23 (feedback on SCAW waterway crossing EWMS).</p> <p>Emails SCAW and DPI Fisheries, 02/03/23 – 09/05/23 (DPI Fisheries consultation on waterway crossing EWMS)</p>	<p>SBT and FSM have not crossed any creeks.</p> <p>SCAW works cross three KFH. An EWMS was prepared in consultation with DPI Fisheries. SCAW updated its documents in response to DPI comments and resubmitted to them for information. No further comments were received. The works commenced after completion of consultation in accordance with the EWMS. The works are nearly complete with no incidents or issues identified by the Project team.</p> <p>No offset to fish habitat is required. Refer E14.</p>	C
E9	Where offsets are required in accordance with Condition E8 , 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 .	Applicable	Applicable	Not Applicable	Site inspection 02, 05/08/24	SBT and FSM have not crossed any creeks.	NT

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					<p>SCAW EWMS, Waterway Crossings 003, 01/03/23</p> <p>SCAW propellor online module (drone photos) 28/04/23</p> <p>Letter DPI Fisheries to SCAW, 10/03/23 (feedback on SCAW waterway crossing EWMS).</p> <p>Emails SCAW and DPI Fisheries, 02/03/23 – 09/05/23 (DPI Fisheries consultation on waterway crossing EWMS)</p>	<p>SCAW works cross three KFH. An EWMS was prepared in consultation with DPI Fisheries. SCAW updated its documents in response to DPI comments and resubmitted to them for information. No further comments were received. The works commenced after completion of consultation in accordance with the EWMS. The works are nearly complete with no incidents or issues identified by the Project team.</p> <p>No offset to fish habitat is required. Refer E14.</p>	
E10	Where offsets are required in accordance with Condition E8 , 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.	Applicable	Applicable	Not Applicable	<p>Site inspection 02, 05/08/24</p> <p>SCAW EWMS, Waterway Crossings 003, 01/03/23</p> <p>SCAW propellor online module (drone photos) 28/04/23</p> <p>Letter DPI Fisheries to SCAW, 10/03/23 (feedback on SCAW waterway crossing EWMS).</p> <p>Emails SCAW and DPI Fisheries, 02/03/23 – 09/05/23 (DPI Fisheries consultation on waterway crossing EWMS)</p>	<p>SBT and FSM have not crossed any creeks.</p> <p>SCAW works cross three KFH. An EWMS was prepared in consultation with DPI Fisheries. SCAW updated its documents in response to DPI comments and resubmitted to them for information. No further comments were received. The works commenced after completion of consultation in accordance with the EWMS. The works are nearly complete with no incidents or issues identified by the Project team.</p> <p>No offset to fish habitat is required. Refer E14.</p>	NT
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.	Not Applicable	Applicable	Not Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT interviews 07-08/02/24</p> <p>SBT Nest Box Installation Report (Bringelly) AMBS ecology, 12/07/2022 – 12 nest boxes were installed and inspected on 13/05/22</p> <p>SBT permit to clear (011) Bringelly, 01/08/22</p> <p>SBT Nest Box Monitoring Report, AMBS, 31/10/23</p> <p>SCAW Fauna and Flora Management Sub-plan, 19/06/24 (SCAW FFMP) including procedures, and evidence of consultation</p> <p>Email AMBS to SCAW, 19/10/23 (update on Nest Box Strategy implementation)</p> <p>Nest Box Monitoring Report January 2024, AMBS, 20/02/24</p> <p>Email SCAW to AMBS, 07/08/24 (follow up on Nest Box inspection)</p>	<p>Nest boxes were sighted during the site inspection. Nest boxes for SBT were installed prior to the current audit period (13/05/22) at the Bringelly site which was more than 30 days prior to clearing. No other SBT sites identified as having hollows. According to the FFMP the nest box monitoring report is required during spring 2023 (during nesting). This was completed and according to the Spring 2023 Nest Box Monitoring Report there has been an approximate 50% uptake of the nest boxes. The next round of monitoring is due in October 2024.</p> <p>SCAW updated its FFMP (in an earlier audit period) with a revised Nest Box Strategy following advice from the project ecologist to account for design changes and reduction in the removal of habitats. This was approved by the Department in fourth audit period). SCAW Nest Box Monitoring Report prepared in February 2024 concluded that 'One-hundred and twenty-four hollows were removed during clearing for the Project from 54 hollow bearing trees. The Project Nest Box Strategy commits to attempting to replace tree hollows removed by clearing for the Project, using nest boxes, at a ratio of 1:1. One-hundred and one nest boxes have been installed on 59 trees for the Project. It is the opinion of AMBS that any additional nestboxes installed within or adjacent to the Project footprint are more likely to be utilised by introduced species than native species. Given the existing nest box installation program has replicated the number of trees with hollows, it is the opinion of AMBS that further nest box installations within or immediately adjacent to the Project footprint should be avoided.' The ecologist completed another nest box monitoring round on 23/07/24 and the report is pending.</p> <p>FSM have not cleared HBTs or related habitats.</p>	C
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 & 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>	Applicable	Applicable	Not Applicable	<p>SBT consultation records June 2022 for E12 with Fisheries, DPHI Water, Liverpool Council, LLS, NPWS, Penrith City Council, WSPT (from second audit period)</p> <p>Email LLS to SBT, 21/06/22 (LLS advising that they could potentially receive timber material).</p>	<p>SBT reused mulch for erosion and sediment control where possible (mulch bunds). Where not reusable, SBT consultation was completed prior to the current audit period which covered all planned clearing. Only LLS responded to request for reuse of native vegetation. Native vegetation was provided to LLS in September 2022.</p> <p>During the fourth audit period, SBT cleared iron bark and grey Box at Orchard Hills as part of clearing in preparation for SSTOM. SBT</p>	C

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	(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>Orchard Hills Vegetation Reuse – Onsite discussion with Peter Ridge from LLS.nsw.gov – E12 – reuse of 2m logs.</p> <p>Email LLS to SBT, 23/08/22 and 26/08/22, and again May through to July 2023, and again on 01/08/23</p> <p>Site inspection 02, 05/09/24</p> <p>Email SCAW to Liverpool and Penrith Council, NPWS, LLS Heritage NSW, Parklands Trust, Landcare, OEH and DPI, 06/02/23</p> <p>Email Parklands to SCAW, 06/02/23</p> <p>Email LLS to SCAW, 06/06/22</p> <p>SCAW Consultation Tracker E12 vegetation</p> <p>Email chain Sydney Metro and SCAW, 03/07/23 and 24/10/24.</p> <p>Email Penrith Council to SCAW, 02/05/23 (off site reuse of seeds)</p> <p>SCAW Timeline of Events, Stockpile Vegetation, Rev0</p>	<p>made contact with LLS about the availability of this vegetation and delivered the material on 01/08/23. SBT did not follow up with any other of the listed stakeholders.</p> <p>SBT does not anticipate any further clearing of native vegetation, if this is the case then this requirement can be considered closed for SBT.</p> <p>SCAW has retained some vegetation on site and is prioritizing reuse on site for future rehabilitation and landscaping. Retention on site was observed during the audit site inspection. Notwithstanding the above, consultation commenced with the view that some reuse on site may not be possible. Two responses have been received expressing interest and Penrith Council has recovered some seeds from the alignment. SCAW provided evidence to show that the current approach is to not mulch any vegetation – all vegetation is to be felled and held on site for the SSTOM and Finalisation Auxiliary Works package. No change for the current audit period. Large woody debris was observed on site for the purposes of handover to SSTOM.</p>	
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 Condition E4. The Tree Survey must be submitted to the Planning Secretary for information with the Place, Urban Design and Corridor Landscape Plan required under Condition E79.</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 Condition E4. 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>Note: 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>	Applicable	Applicable	Not Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT Tree Survey, Orchard Hills, 28/07/22</p> <p>SBT Tree Survey, St Marys, 20/07/22</p> <p>SCAW E13 Tree Survey, 20/12/22</p> <p>Metro Tree Register (AEW) (no date).</p> <p>Auditee response to RF12, received 27/02/24</p>	<p>SBT Tree Surveys were prepared by SBT for Orchard Hills and St Marys. This includes the information required by this condition. Other sites were subject to offset under E4. No change for current audit period. Revegetation does not form part of SBT's scope.</p> <p>SCAW has prepared a tree survey (for non-offset trees). This includes the information required by this condition. 25 trees accounted for that are not offset. No change for current audit period.</p>	C
E14	<p>The Proponent must design the watercourse crossings and the east-west regional corridor (Paton's 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 DPI EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition.</p>	Applicable	Applicable	Not Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter HBI to Sydney Metro, 22/05/24 (ER endorsement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>Site inspection 02, 05/08/24</p> <p>SCAW Memo, summary of consultation on E14, 24/11/22 (including evidence of consultation attached).</p> <p>Letter DPI Fisheries to SCAW 10/08/22</p> <p>SCAW Blaxland Creek Viaduct (Substructure and Superstructure) design reports SCARB 4150 and 4110 (x2), CPBUI, 16/01/23 and 02/02/23</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW EWMS, Waterway Crossings 003, 01/03/23</p> <p>SCAW propellor online module (drone photos) 28/04/23</p> <p>Letter DPI Fisheries to SCAW, 10/03/23 (feedback on SCAW waterway crossing EWMS).</p>	<p>This is not relevant to SBT, FSM, as there are no watercourse crossings for those packages.</p> <p>SCAW has prepared two design reports for works involving crossings. The Design Reports the design to be compliant with this condition. Evidence demonstrates that DPHI EES was consulted with and did not wish to participate. Fisheries was consulted and confirmed that condition E14 had been complied with (in their view). The relevant design details have been incorporated into SCAWs PUDCLP.</p> <p>A redesign was completed at Cosgrove Creek (to avoid nearby heritage scar trees). This update was issued to DPI Fisheries for further consultation. DPI Fisheries confirmed acceptance.</p> <p>SCAW works cross three KFH. An EWMS was prepared in consultation with DPI Fisheries. SCAW updated its documents in response to DPI comments and resubmitted to them for information. No further comments were received. The works commenced after completion of consultation in accordance with the EWMS and are nearly complete with the project team not aware of any incidents or issues associated with these works.</p>	C

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	Note: These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79 .				<p>Emails SCAW and DPI Fisheries, 02/03/23 – 09/05/23 (DPI Fisheries consultation on waterway crossing EWMS)</p> <p>Email SCAW to DPI Fisheries, 07/07/23 (consultation on redesign on Cosgrove creek crossing to avoid heritage scar trees)</p> <p>Email DPI Fisheries to SCAW, 18/07/23 (DPI response to redesign on Cosgrove creek crossing to avoid heritage scar trees)</p>																													
Flooding																																		
E15	<p>The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in Condition A1 or the flood impact criteria in Table 5, 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> <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="3">Land zoned as residential, industrial or commercial, and critical infrastructure</td> <td>Maximum 10mm to buildings that are flood prone in existing conditions</td> </tr> <tr> <td>No new above floor flooding</td> </tr> <tr> <td>Maximum 50 mm where flooding is below floor level</td> </tr> <tr> <td>Roads</td> <td>Maximum 50mm</td> </tr> <tr> <td rowspan="2">Velocity</td> <td>Land zoned as rural, primary production, environment or public recreation</td> <td>Maximum 100mm</td> </tr> <tr> <td>All areas</td> <td>Velocities are to remain below 1m per second. Where existing velocities exceed 1m per second, increase by less than 10 percent</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>Measures identified in the documents listed in Condition A1 to limit flooding impacts or measures that achieve 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 10mm to buildings that are flood prone in existing conditions	No new above floor flooding	Maximum 50 mm where flooding is below floor level	Roads	Maximum 50mm	Velocity	Land zoned as rural, primary production, environment or public recreation	Maximum 100mm	All areas	Velocities are to remain below 1m per second. Where existing velocities exceed 1m per second, increase by less than 10 percent	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	Applicable	Applicable	Applicable	<p>SBT Hydrology and Flood Assessment Design Report, 28/11/22 and update 24/04/23</p> <p>SBT interview 07-08/08/24</p> <p>SBT response to draft Independent Audit No. 3 - Audit Report</p> <p>SCAW Flood Protection Report, AHJV, 16/12/22</p> <p>Flood Protection Report Revision 00 (SMWSASCA-CPU-SWD-EW000-SD-RPT-245000) issued 03/03/23</p> <p>Sydney Metro central portal (online document review portal, and evidence of stage 3 review gate comments sheet for Flood Protection Report)</p>	<p>As noted in the third Independent Audit Report, the SBT Hydrology and Flood Assessment Design Report identifies the flood impacts and assess these against the requirements of E15. The Report identifies several departures from the requirements around the Bringelly site (afflux and velocity). SBT completed a review of the data and determined that predicted flood impacts are within the tolerable ranges from E15. The Auditor is not a flood expert and therefore does not dispute this position. The Auditor is not aware of any further feedback from the Sydney Metro team on this matter. SBT considers there to be no change to the flood design. If this is the case then this requirement can be considered closed for SBT.</p> <p>As noted in the third Independent Audit Report the SCAW Flood Protection Report identifies the flooding impacts against the requirements of E15. The Report identifies that it is compliant with the parameters of E15, however in the comments section of the Report (Appendix C) there were a range of observations against the Report's dealing with E15, including comments indicating that there are exceedances of the criteria from E15. SCAW completed a review of the data and determined that predicted flood impacts are compliant with the requirements of E15. An updated report was prepared clarifying this. The Auditor is not a flood expert and therefore does not dispute this position. The Auditor is not aware of any further feedback from the Sydney Metro team on this matter. SCAW considers there to be no change to the flood design. If this is the case then this requirement can be considered closed for SCAW</p> <p>FSM is outside flood prone land.</p>	C
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E16	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	Applicable	Applicable	Applicable	<p>SBT Hydrology and Flood Assessment Design Report, 28/11/22 and update 24/04/23</p> <p>SBT interview 07-08/08/24</p> <p>SCAW Flood Protection Report, AHJV, 16/12/22</p> <p>Flood Protection Report Revision 00 (SMWSASCA-CPU-SWD-EW000-SD-RPT-245000) issued 03/03/23</p>	<p>The SBT Hydrology and Flood Assessment Design Report identifies the flood impacts and assess these against the requirements of E16. It states that incorporation of the Wianamatta-South Creek Catchment Flood Assessment is not able to be validated due to poor resolution of the Wianamatta-South Creek Catchment Flood Assessment model, and its low relevance to the SBT sites. Sydney Metro reviewed this finding and, on 25/11/22 marked the matter as closed. The Auditor is not a flood expert and, therefore, does not dispute this action. SBT considers there to be no change to the flood design. If this is the case then this requirement can be considered closed for SBT.</p> <p>The SCAW Flood Protection Report confirms that the results of the Wianamatta-South Creek Catchment Flood Assessment have been included into the modelling. The Report does identify the post construction flood behaviour (no significant impact on the catchment). SCAW considers there to be no change to the flood design. If this is the case then this requirement can be considered closed for SCAW</p>	C																											
E17	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	Applicable	Applicable	Applicable	Refer to evidence in E15	Refer to findings from E15. The modelling and subsequent clarifications determined that there is no need for consultation with landowners on the basis that criteria from E15 has been achieved.	NT																											

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	(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. In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in Condition E15 , the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures						
E18	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. 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.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	Construction is ongoing.	NT
Heritage							
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1 . 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.	Applicable	Applicable	Applicable	<p>Unexpected Heritage Finds Procedure, Sydney Metro, August 2021</p> <p>SBT CEMP (Annexure B – unexpected finds protocol), 15/03/24</p> <p>SBT St Marys Archaeological Monitoring Method Statement, AMBS, January 2022</p> <p>SBT St Marys Archaeological Monitoring Report, AMBS, December 2022</p> <p>SBT interview 07-08/08/24</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>Sydney Metro interview 05-09/08/24</p> <p>SCAW CEMP, 29/07/24</p> <p>SCAW Non-Aboriginal Heritage Management Plan, 04/10/22</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>Unexpected Heritage Find Reporting Form, 22/11/22 (potential find of heritage work during excavation at the SCAW compound)</p> <p>SCAW interview 09/08/24</p> <p>Unexpected Heritage Find Reporting Form, 12/01/23 (Scar tree find at Cosgrove's Creek, Luddenham)</p> <p>Letter DPI Fisheries to SCAW, 10/03/23 (feedback on SCAW waterway crossing EWMS).</p> <p>Emails SCAW and DPI Fisheries, 02/03/23 – 09/05/23 (DPI Fisheries consultation on waterway crossing EWMS)</p> <p>Site access and haul package site plan 255127, Rev2, SCAW (redesign around scar trees)</p>	<p>It is understood that known heritage items from the EIS have been cleared prior to construction that impacts the land on which they reside, or design has been refined to avoid the items, or works affecting the items has yet to occur.</p> <p>SBT St Marys Archaeological Monitoring Report confirmed that supervision was carried out during works in risk area, and that no items of significance were identified during the works in the subject area. There were no other areas of heritage significance subject to disturbance. SBT have trained the workforce in identification and reporting on heritage finds. SBT are not aware of any unexpected finds during the audit period.</p> <p>SCAW utilizes the Metro procedure. The Non-Aboriginal Heritage Management Plan has identified that unexpected finds for non-Aboriginal heritage to be unlikely. SCAW have trained the workforce in identification and reporting on heritage finds. There were no unexpected finds in the audit period. During the SCAW RAP walk through in November 2022, as part of welcome to country two scar trees were identified. The trees remain in place and redesign has occurred to avoid these trees.</p>	C

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					<p>AEW FSM Construction Environmental Management Plan, Laing O'Rourke, 15/03/24 (Appendix Q)</p> <p>Letter GML to Laing O'Rourke, 02/08/24 (heritage advice regarding heritage finds uncovered to date)</p>	<p>The AEW FSM CEMP has the Metro procedure in their CEMP. FSM damaged heritage coping on the St Marys station again during the current audit period. The heritage advisor reviewed the incident and accepted the repair works were consistent with the fabric and no significance of the issue. Bricks and the like are located within the St Marys platform. FSM has had the heritage advisor on site during the possession works to manage / record the potential heritage significance of finds in the platform. To date all finds are deemed to be of local significance or not significant. UFH11 and 12 (brick installation) were recommended to be further researched under post excavation assessment. The heritage advisor has accepted that the items be recorded and destroyed as part of the works and continue to implement the UFP and ARD. One</p> <p>Historic heritage to be protected and retained extends to the Goods Shed. This area has not been impacted as yet.</p> <p>According to an email within Metro (from the Sydney Metro Heritage Lead) all sites have been cleared as at 30/08/22.</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.	Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The jib crane is still in place and is free of damage.	C
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 .	Applicable	Not Applicable	Applicable	<p>SBT CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN, 15/03/24 (SBT CEMP)</p> <p>SBT interview 07-08/08/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023</p> <p>Email chain, Transport to Sydney Metro, 02/03/21 – 31/05/21 (Transport Heritage Advisor advice on vibration impact on the Goods Shed)</p> <p>Email Chain AMBS and Sydney Metro, 27/01/23 – 03/02/23 (heritage advice on installation of 'crack meters' at the Goods Shed)</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT toolbox talk, 16/04/24 (heritage building awareness)</p>	<p>The EIS identified minor impacts to the Goods Shed. Controls were included in the SBT CEMP (refer aspects and impacts register).</p> <p>It is understood based on the evidence sighted that the only heritage item in the safe working distance of construction during the audit period is the Goods Shed at St Marys. Sydney Metro sought advice of Transport for NSW's Heritage Specialist on vibration impacts and monitoring. The Heritage Specialist confirmed that vibration monitoring installed was as per the Sydney Trains Technical Note for the Installation of New Electrical and Data Services at Heritage Sites. Advice was also sought from Sydney Metro on the installation of crack meters at the Goods Shed. On 02/02/23 the Heritage Specialist from AMBS confirmed the method to be adopted was acceptable.</p> <p>One minor vibration exceedance was recorded on the Goods Shed during the sixth audit period (triggering the level for investigation, not an exceedance of the DIN/BS criteria in the NVMP). no adverse impact was identified by SBT. Note that SSTOM has control of the vibration logger for all periods excluding the time of TBM breakthrough and retrieval).</p> <p>Note that SBT have set up sheds and generators directly adjacent to the goods shed. No damage / contact points were observed that SBT has conducted toolbox training on the importance of the Shed.</p>	C
E22	The Archaeological Research Design included in the documents listed in Condition A1 must be implemented during construction.	Applicable	Applicable	Applicable	<p>Archaeological Research Design, Artefact, April 2021</p> <p>SBT AMBS Archaeological Statement 22/07/22 confirming monitoring of concrete slab at St Marys SBT.</p> <p>SBT St Marys Site Archaeological Report by AMBS June 2022</p> <p>SBT St Marys Archaeological Monitoring Method Statement, AMBS, January 2022</p> <p>SBT St Marys Archaeological Monitoring Report, AMBS, December 2022</p> <p>Sydney Metro interview 05-09/08/24</p>	<p>AMBS was engaged as the archaeological specialists for SBT adjacent the Goods Shed on a risk based approach. The monitoring reports confirm that the ARD has been implemented for subject works despite this not being called up under the ARD and approval. Works in the area called up by the ARD (Goods Shed) have not commenced and have not been required at this time.</p> <p>No works have been required under the ARD during the audit period. The only requirement during the audit period was to follow and implement the unexpected finds procedure. There were no unexpected finds recorded during the audit period.</p>	C

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E23	Before commencement of archaeological excavation, the Proponent must, in consultation with Heritage NSW, nominate a suitably qualified Excavation Director , who complies with Heritage Council of NSW's Criteria for Assessment of Excavation Director (September 2019), to oversee and advise on matters associated with historical archaeology for the approval of the Planning Secretary. The Excavation Director 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 Archaeological Research Design and Excavation Methodology(s) identified in the documents listed in Condition A1 . More than one Excavation Director may be engaged for CSSI to exercise the functions required under the conditions of this approval.	Applicable	Applicable	Applicable	Excavation Director was nominated – James Cole, AMBS letter of approval from Heritage NSW dated 6/7/22 Letter Sydney Metro to DPHI, 10/06/22 (nomination of Excavation Director to DPHI) SBT St Marys Archaeological Monitoring Method Statement, AMBS, January 2022 SBT St Marys Archaeological Monitoring Report, AMBS, December 2022 Letter Heritage NSW to Sydney Metro, 13/04/22 (Heritage NSW endorsement of Lian Ramage) Letter DPHI to Sydney Metro, 01/03/23 (DPHI approval of Lian Ramage) Letter DPHI to Sydney Metro, 17/06/22 (DPHI approval of the SBT St Marys Excavation Directors – Dr Ian Stuart and Jenny Winnett) SCAW interview 09/08/24 Sydney Metro interview 05-09/08/24 Letter Heritage NSW to Sydney Metro 13/06/23 (Heritage endorsement of Sophie Jennings as Excavation Director for FSM) Letter DPHI to Sydney Metro, 04/07/23 (DPHI approval of Sophie Jennings as Excavation Director for FSM). Letter DPHI to Metro, 14/05/24 (DPHI approval of Kat McCrae as the FSM excavation director).	There are no areas requiring archaeological excavation under the SCAW scope of works and, therefore, have not engaged an Excavation Director for their scope. Sydney Metro advise that the following excavation directors have been nominated to date: SBT: Lian Ramage was nominated as ED to Heritage NSW on 7 April 2023. Heritage NSW provided correspondence supporting her nomination on 13 April 2023. James Cole was nominated as Secondary ED to Heritage NSW on 23 June 2022. Heritage NSW provided correspondence supporting her nomination on 6 July 2022. Sydney Metro are preparing to submit nominations for Lian Ramage and James Cole to the Department. For SBT, the archaeological excavation to date has not been required under the ARDEM, rather some excavation at St Marys was conducted under supervision on a risk based approach. These works are complete and the site has been handed over to SSTOM. AEW: Note this is prior to the current audit period. Dr Ian Stuart and Jenny Winnett were nominated as ED to Heritage NSW on 1 June 2022. Heritage NSW provided correspondence supporting their nomination on 2 June 2022. The Department provided approval of the appointment on 17/06/22. Sophie Jennings was nominated as the excavation director for FSM. Heritage NSW endorsement was received 13/06/23 and the Department approved Ms Jennings on 04/07/23. Kat McCrae was nominated as the excavation director for FSM. Heritage NSW endorsement was received prior to approval request to the Department (and the Department approved Ms Jennings on 14/05/24).	C
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 Archival Recording Report . 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 How to Prepare Archival Records of Heritage Items (NSW Heritage Office, 1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (NSW Heritage Office, 2006).	Applicable	Applicable	Applicable	St Mary's Railway Station, Archival Recording, Biosis, 11/01/22 (Archival Recording Report) Bringelly RAAF Base Compound, 15/11/21 (Archival Recording Report) Archival Report, Alexander Mayes Photography, August 2022 (Luddenham Road) Archival Recording Report – SBT Kelvin Park, AMBS, March (adjacent Aerotropolis). Archival Recording Report, Alexander Mayes Photography, August 2022 (McMaster and McGarvie-Smith Farms) Memo AMBS to SCAW, 18/01/23 (Heritage Fabric Salvage assessment on McMaster and McGarvie-Smith Farms)	The SBT Archival Recording Reports were prepared for the entire St Marys Railway Station area (i.e.: covering all areas relevant for the entire Project at this location) and Bringelly RAAF base, plus outside Aerotropolis. The recording was completed prior to impact. No other locations are affected by SBT at this stage. The SCAW project had archival recording completed on the Luddenham road and the Farm buildings. The recording was completed as per this condition prior to impact. Archival recording for the AEW packages was conducted (if required) prior to the current audit period. Unless anything were to change, this requirement can be considered closed for SBT, SCAW and FSM.	C
E25	The Archival Recording Report 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 Archival Recording Report must also be provided to relevant local historical societies.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24 DPHI post approval portal lodgement records, 05/02/24, 19/08/24 (submission of Reports to DPHI) Letter Heritage NSW to Sydney Metro, 26/02/24 and 18/04/24 (Heritage review and acceptance of the Reports) Email Sydney Metro to Councils, 05/03/24, 07/03/24, 13/03/24, 21/03/24 (submission of Reports to Councils) Email Metro to Nepean District Historical Society, 18/08/24 (submission of Reports to Historical Society)	This requirement is not yet due. Sydney Metro provided evidence showing submission of the following reports to the Department, Heritage NSW, Councils and historical society. <ul style="list-style-type: none"> Bringelly RAAF Photo Archival Recording, Artefact Heritage, November 2021; Kelvin Photo Archival Recording, AMBS, September 2023 McGarvie Smith Farm Photo Archival Recording, Alexander Mayes Photography, August 2022 	C

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E26	Following completion of all work described in the documents listed in Condition A1 in relation to heritage items, a non-Aboriginal Archaeological Excavation Report 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.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	Works are ongoing.	NT
E27	The non-Aboriginal Archaeological Excavation Report 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 Report must also be provided to relevant local historical societies and local libraries.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24	Works are ongoing.	NT
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.	Applicable	Applicable	Applicable	<p>Aboriginal Cultural Heritage Management Plan, Sydney Metro, 19/08/21 (ACHMP)</p> <p>SBT CEMP (Annexure B – unexpected finds protocol), 15/03/24</p> <p>SBT St Marys Archaeological Monitoring Method Statement, AMBS, January 2022</p> <p>SBT St Marys Archaeological Monitoring Report, AMBS, December 2022</p> <p>SBT interview 07-08/08/24</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, unexpected finds and heritage, visual amenity, air quality, waste</p> <p>Sydney Metro interview 05-09/08/24</p> <p>SCAW CEMP, 29/07/24</p> <p>SCAW Non-Aboriginal Heritage Management Plan, 04/10/22</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSER, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>Unexpected Heritage Find Reporting Form, 22/11/22 (potential find of heritage work during excavation at the SCAW compound)</p> <p>SCAW interview 09/08/24</p> <p>Unexpected Heritage Find Reporting Form, 12/01/23 (Scar tree find at Cosgrove's Creek, Luddenham)</p> <p>Sydney Metro Archaeological Site Clearance Certificates (x8)</p> <p>Email Metro internal, 30/08/22 (status update on Aboriginal archaeological clearance).</p>	<p>It is understood that known heritage items from the EIS have been cleared prior to construction that impacts the land on which they reside, or design has been refined to avoid the items, or works affecting the items has yet to occur.</p> <p>SBT St Marys Archaeological Monitoring Report confirmed that supervision was carried out during works in risk area, and that no items of significance were identified during the works in the subject area. There were no other areas of heritage significance subject to disturbance. SBT have trained the workforce in identification and reporting on heritage finds. SBT are not aware of any unexpected finds during the audit period.</p> <p>SCAW utilises the Metro unexpected finds procedure. The Non-Aboriginal Heritage Management Plan has identified that unexpected finds for non-Aboriginal heritage to be unlikely. SCAW have trained the workforce in identification and reporting on heritage finds.</p> <p>During the SCAW walk through in November 2022, as part of welcome to country two scar trees were identified. The trees remain in place and redesign has occurred (during the audit period) at Cosgrove's Creek to avoid these trees. The subject site was observed during the audit site inspection. No other unexpected finds were identified or managed during the current audit period. The coordinates of the trees were not correct in project documentation, but this error has been identified as documentation is in the process of being updated. The error has not resulted in harm or impact on the trees.</p> <p>Metro advises that there were no Aboriginal unexpected finds associated with AEW works.</p> <p>Aboriginal archaeological investigations and salvage was completed. As at 01/02/23, eight sites have been cleared or partially cleared for the purpose of the SM-WSA project, in accordance with the ACHMP:</p> <ul style="list-style-type: none"> • BWB • B22 (AHIMS 45-5-2640) • AS3 • UVA1 • AS7 • AS6 • UVA2; and • AS2. <p>According to an email within Metro all sites have been cleared as at 30/08/22. No change for the current audit period.</p>	C
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.	Applicable	Applicable	Applicable	Aboriginal Cultural Heritage Management Plan, Sydney Metro, 19/08/21 (ACHMP)	Metro advised that, prior to the current audit period, Sydney Metro consulted with RAPs on the final ACHMP. According to a register consultation during the audit period comprised: emails to RAPs regarding fieldwork and on site consultation (August and December	C

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					00_WSA RAP consultation.xls (RAP consultation register) WSA RAP consultation log, Sydney Metro, 24/6/24 Quarterly Registered Aboriginal Party (RAP) update December 2023, issued 12/12/23	2022), presentation of preliminary findings from investigations (September 2022), update email (and letter) on details of all salvage and artefact assemblage (December 2022). An update was provided to the RAPs on the results of the archaeological program (3D scanning etc.) and advised that they will be provided a copy of the report and request feedback (July 2023). One response supporting the 3D scanning was received from a RAP representative. Further consultation was undertaken in September, December and January about lithic analysis, salvage report progress, coordinates on scar trees and ACHMP update. Metro has also completed consultation on 23/02/24, 08/03/24, 24/06/24 around project updates. According to Metro the RAPs are no longer showing interest due to the Project having moved on from works involving Aboriginal heritage items.	
E30	The Aboriginal Cultural Heritage Management Plan included in the documents listed in Condition A1 must be updated to include: (a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed; (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; (c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations; (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; (e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and (f) a procedure to report and update the effectiveness of the Aboriginal Cultural Heritage Management Plan following the completion of survey, test excavation activities or significant artefact finds. The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations. Note: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.	Applicable	Applicable	Applicable	Aboriginal Cultural Heritage Management Plan, Sydney Metro, 19/08/21 (ACHMP) Letter DPHI to Sydney Metro, 24/09/21 Sydney Metro interview 05-09/08/24 Sydney Metro Archaeological Site Clearance Certificates (x8) Email Metro internal, 30/08/22 (status update on Aboriginal archaeological clearance). Email AECOM to Sydney Metro, 26/07/23 (update on status on Aboriginal Cultural Heritage Excavation Report(s))	Metro evidence indicates that the Aboriginal Cultural Heritage Plan was updated as per this condition and submitted to the Department. Test excavations commenced on 27/01/22 (i.e.: after submission of the ACHMP to the Department) Aboriginal archaeological investigations and salvage was completed. As at 01/02/23, eight sites have been cleared or partially cleared for the purpose of the SM-WSA project, in accordance with the ACHMP: <ul style="list-style-type: none">• BWB• B22 (AHIMS 45-5-2640)• AS3• UVA1• AS7• AS6• UVA2; and• AS2. According to Sydney Metro all sites have been cleared as at 30/08/22. No change for the current audit period.	C
E31	The updated Aboriginal Cultural Heritage Management Plan must be implemented for the duration of salvage activities and construction.	Applicable	Applicable	Applicable	Aboriginal Cultural Heritage Management Plan, Sydney Metro, 19/08/21 (ACHMP) Letter DPHI to Sydney Metro, 24/09/21 Sydney Metro interview 05-09/08/24 Sydney Metro Archaeological Site Clearance Certificates (x8) Email Metro internal, 30/08/22 (status update on Aboriginal archaeological clearance). Email AECOM to Sydney Metro, 26/07/23 (update on status on Aboriginal Cultural Heritage Excavation Report(s)) Quarterly Registered Aboriginal Party (RAP) update December 2023, issued 12/12/23	To note, test excavation has been completed and the site cleared. The clearance certificates include a statement from the consultant that works were carried out as per the ACHMP and that relevant area has been cleared. Metro are not aware of any areas that will be subject to further excavation and therefore no updates to the mapping, the methodology or the ACHMP. The Project is now in a phase where unexpected finds is the only action on site remaining. Refer to E28 – E36 with respect to completion of other requirements captured in the ACHMP.	C
E32	At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified person. The Aboriginal Cultural Heritage Excavation Report(s) must: (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	Applicable	Applicable	Applicable	Sydney Metro interview 05-09/08/24 Sydney Metro Archaeological Site Clearance Certificates (x8)	Aboriginal archaeological investigations and salvage was completed. As at 01/02/23, eight sites have been cleared or partially cleared for the purpose of the SM-WSA project, in accordance with the ACHMP:	C

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	<p>(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).</p> <p>The RAPs 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, Gandagara LALC and Deerubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).</p>				<p>Email Metro internal, 30/08/22 (status update on Aboriginal archaeological clearance).</p> <p>Email AECOM to Sydney Metro, 26/07/23 (update on status on Aboriginal Cultural Heritage Excavation Report(s))</p> <p>00_WSA RAP consultation.xls (RAP consultation register)</p> <p>WSA RAP consultation log, Sydney Metro, Feb 24</p> <p>Sydney Metro Western Sydney Airport: Aboriginal Cultural Heritage Excavation Report, prepared by Aecom, dated 7 March 2024</p> <p>Quarterly Registered Aboriginal Party (RAP) update December 2023, issued 12/12/23</p> <p>Letter Heritage NSW to Metro, 30/05/24 (confirmation of receipt of the Aboriginal Cultural Heritage Excavation Report)</p> <p>Email Metro to Councils 15/08/24 (submission of the Aboriginal Cultural Heritage Excavation Report)</p> <p>DPHI post approval portal lodgement, 19/08/24 (submission of the Aboriginal Cultural Heritage Excavation Report)</p>	<ul style="list-style-type: none"> BWB B22 (AHIMS 45-5-2640) AS3 UVA1 AS7 AS6 UVA2; and AS2. <p>According to an email within Metro all sites have been cleared as at 30/08/22 (the first of which was cleared in July 2022). The Excavation Reports are due in ~July 2024.</p> <p>The heritage consultant advised that the draft Aboriginal Cultural Heritage Excavation Report was submitted to Sydney Metro and the RAPs in late 2023. There was 1 x response and the Report is being updated.</p> <p>The Report has been finalized and submitted to each of the stakeholders in this condition.</p>	
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 Unexpected Heritage Finds and Human Remains Procedure required by Condition E34 and include registration in the Aboriginal Heritage Information Management System (AHIMS), where required.	Applicable	Applicable	Applicable	<p>Sydney Metro interview 05-09/08/24</p> <p>Unexpected Heritage Finds Procedure, Sydney Metro, May 2021</p> <p>Unexpected Heritage Find Reporting Form, 12/01/23 (Scar tree find at Cosgrove's Creek, Luddenham)</p> <p>Site access and haul package site plan 255127, Rev2, SCAW (redesign around scar trees)</p> <p>Site inspection 02, 05/08/24</p>	<p>Sydney Metro are not aware of any unexpected finds during the audit period (or prior) with the exception of the following: During the SCAW walk through in November 2022, as part of welcome to country two scar trees were identified. Trees have been protected, additional consultation undertaken and trees were registered on AHIMS (#45-5-5667, and #45-5-5668). Consultation was undertaken, the trees were registered. The trees remain in place and redesign has occurred to avoid these trees. The area remains protected with a sufficient buffer in place.</p>	C
E34	An Unexpected Heritage Finds and Human Remains Procedure 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.	Applicable	Applicable	Applicable	<p>Unexpected Heritage Finds Procedure, Sydney Metro, May 2021</p> <p>Exhumation Management Procedure, Sydney Metro, May 2021 (Human Remains Procedure)</p> <p>Letter DPHI to Sydney Metro, 30/09/21</p> <p>SBT CEMP (Annexure B – unexpected finds protocol), 15/03/24</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, unexpected finds and heritage, visual amenity, air quality, waste</p> <p>SCAW CEMP, 29/07/24</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24 (Appendix Q)</p> <p>FSM unexpected Heritage Finds Report, Weekend 48, GML</p>	<p>The Unexpected Heritage Finds and Human Remains Procedure was prepared in accordance with the relevant guideline by a suitably qualified person, and was approved by the Department prior to the current audit period.</p> <p>The procedure has been summarised in Annexure B of the approved SBT CEMP.</p> <p>The approved SCAW CEMP has identified this requirement as being the responsibility of Metro. The protocol has been followed when triggered. Refer E28.</p> <p>The FSM CEMP includes the Metro unexpected finds procedure.</p>	C
E35	The Unexpected Heritage Finds and Human Remains Procedure 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.	Applicable	Applicable	Applicable	<p>SBT CEMP (Annexure B – unexpected finds protocol), 15/03/24</p>	<p>The Unexpected Heritage Finds and Human Remains Procedure was prepared in accordance with the relevant guideline by a suitably qualified person in consultation with Heritage NSW, and was approved by the Department prior to the current audit period.</p>	C

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					<p>Unexpected Heritage Finds Procedure, Sydney Metro, May 2021</p> <p>Exhumation Management Procedure, Sydney Metro, May 2021 (Human Remains Procedure)</p> <p>Letter DPHI to Sydney Metro, 30/09/21 (approval of Unexpected Heritage Finds and Exhumation Management Procedures)</p> <p>SCAW CEMP, 29/07/24</p>	<p>The procedure has been summarised in Annexure B of the approved SBT CEMP.</p> <p>The approved SCAW CEMP has identified the development of the procedure to be the responsibility of Metro. SCAW utilises the Metro procedure. The protocol has been followed when triggered. Refer E28.</p> <p>The FSM CEMP includes the Metro unexpected finds procedure.</p>	
E36	<p>The Unexpected Heritage Finds and Human Remains Procedure, 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>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. 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 Unexpected Heritage Finds and Human Remains Procedure.</p>	Applicable	Applicable	Applicable	<p>SBT CEMP (Annexure B – unexpected finds protocol), 15/03/24</p> <p>Unexpected Heritage Finds Procedure, Sydney Metro, May 2021</p> <p>SBT St Marys Archaeological Monitoring Method Statement, AMBS, January 2022</p> <p>SBT St Marys Archaeological Monitoring Report, AMBS, December 2022</p> <p>SBT interview 07-08/08/24</p> <p>SCAW CEMP, 29/07/24</p> <p>Unexpected Heritage Find Reporting Form, 22/11/22 (potential find of heritage work during excavation at the SCAW compound)</p> <p>SCAW interview 09/08/24</p> <p>Unexpected Heritage Find Reporting Form, 12/01/23 (Scar tree find at Cosgrove’s Creek, Luddenham)</p> <p>FSM unexpected Heritage Finds Report, Weekend 48, GML</p> <p>Site inspection 02, 05/08/24</p> <p>LORAC Non-conformance Report for event on 27/04/24 (unexpected find)</p>	<p>The procedure has been incorporated into the SBT CEMP. SBT have trained the workforce in identification and reporting on heritage finds. SBT are not aware of any unexpected finds during the audit period.</p> <p>The approved SCAW CEMP has identified the development of the procedure to be the responsibility of Metro. SCAW utilises the Metro procedure. The protocol has been followed when triggered.</p> <p>During the SCAW walk through in November 2022, as part of welcome to country two scar trees were identified. Trees have been protected, additional consultation undertaken and trees were registered on AHIMS (#45-5-5667, and #45-5-5668). Consultation was undertaken, the trees were registered. The trees remain in place and redesign has occurred to avoid these trees. The protection of the trees was observed during the audit site inspection.</p> <p>There have been numerous unexpected finds on FSM during auger and excavation works. These comprise historical brickwork / footings. The heritage consultant has authorized that the items are not of significance and do not require salvage or further investigation and can be continued to be impacted during the works.</p> <p>Observation FSM: On 27/04/24 LORAC encountered a heritage item and enacted the Unexpected Finds Procedure (UFP). However, LORAC did not notify the Metro Environmental Manager as required by the UFP. This was self identified by LORAC and reported to Sydney Metro upon becoming aware of the deficiency. This was not considered a non-compliance by LORAC or Sydney Metro on the basis that the find was a continuation of a previously reported unexpected find and that LORAC implemented the corrective action process identified in its CEMP, including notifying the heritage specialist, reviewing the workpack structure and retraining the workforce in reporting requirements.</p>	C
Noise and Vibration							
E37	<p>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 Detailed Noise and Vibration Impact Statements required under Condition E47.</p>	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for</p>	<p>The Land Use Surveys are included in the SBT, SCAW, FSM DNVISs. According to the revision dates on the Land Use Surveys within the DNVISs (or those from previous audit periods), the surveys appear to have been prepared prior to works resulting in construction noise, vibration or ground borne noise.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Land Use Survey, Resonate, 05/08/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Survey and Utility Investigation Works, 21/09/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Material Delivery and Stockpiling, 23/02/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, OOHW deliveries at Elizabeth Drive, 09/01/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 26/07/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21/09/23 and ER letter of endorsement 11/10/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p>		
E38	<p>Work must only be undertaken during the following hours:</p> <p>(a) 7:00am to 6:00pm Mondays to Fridays, inclusive;</p> <p>(b) 8:00am to 1:00pm Saturdays; and</p> <p>(c) at no time on Sundays or public holidays.</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT Toolbox Talk register, Jan – August 24 (environmental toolbox talk register, showing 16 x enviro toolbox deliveries in last 8 months covering dust management, site hives, incidents, groundwater, TBM retrieval chemical storage, water discharge and OOHW)</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT OOHW register, current to Aug 24</p> <p>SBT Permit application register (includes clearing, dewatering, 12x OOHW permits), current to July 24.</p> <p>SBT Non-compliance report 21/04/24 (identified 29/04/24) and submission to DPHI 06/05/24</p>	<p>Construction hours (standard and high noise) are specified within project documentation and have been communicated to the workforce through the induction, Work Packs, some environmental control maps, posters and toolboxes. The workforce has signed on to the relevant documents acknowledging that they understand the requirements.</p> <p>High risk activities are monitored by construction staff and the ER. According to the ER Monthly Reports, there do not appear to be any other instances of breaches of the work hours.</p> <p>Several noise complaints have been received but the Auditor does not consider this to be excessive, do not indicate breaches, and the responses appear appropriate.</p> <p>SBT recorded one non-compliance with hours of work. Refer E41.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW Work Pack, Pier bracket Installation and Relocation, 15/09/23 (still in use)</p> <p>SCAW Work Pack, Piers and Capital Works near waters, 12/10/23 (still in use)</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>AEW FSM Construction Environmental Management Plan, Laing O'Rourke, 15/03/24</p> <p>Laing O'Rourke, Field View (checklist and inspection module covering housekeeping, parking, ECMs, project boundary, dust controls, emissions, bunding, waste management, ERSED, water discharges, OOHW, UFP), (online spanning the audit period)</p> <p>FSM Toolbox Talk 08/03/24 (covers CEMP, ECMs, aspects and risks (noise, hours, water, ERSED, traffic and access, heritage), hold points, roles and responsibilities, hold points, approval timeframes, incidents and non-compliances</p> <p>FSM Toolbox Talk 19/04/24 (covers waste management minimization and sustainability)</p> <p>FSM Toolbox Talk 24/05/24 (covers heritage)</p> <p>FSM Possession Packs WE38, WE44, WE 48, covers noise and vibration, heritage, waste and stockpiling</p> <p>FSM Toolbox Talk, 26/05/24, (covering incidents)</p> <p>FSM Toolbox Talk 05/06/24 (covers sustainability)</p> <p>FSM OOHW permits WE38, WE44, WE47 .</p> <p>ER Monthly Reports for February – July 24</p> <p>Complaints register current to 16/08/24</p>		
E39	<p>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:</p> <p>(a) between the hours of 8:00 am to 6:00 pm Monday to Friday;</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and</p>	<p>High noise construction are specified within project documentation and have been communicated to the workforce through the induction, Work Packs, environmental control maps, and toolboxes. The workforce has signed on to the relevant documents acknowledging that they understand the requirements.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(b) between the hours of 8:00 am to 1:00 pm Saturday; and</p> <p>(c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour.</p> <p>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.</p>				<p>water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT Toolbox Talk register, Jan – August 24 (environmental toolbox talk register, showing 16 x enviro toolbox deliveries in last 8 months covering dust management, site hives, incidents, groundwater, TBM retrieval chemical storage, water discharge and OOHW)</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT OOHW register, current to Aug 24</p> <p>SBT Permit application register (includes clearing, dewatering, 12x OOHW permits), current to July 24.</p> <p>SBT Non-compliance report 21/04/24 (identified 29/04/24) and submission to DPHI 06/05/24</p> <p>Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>SCAW synergy SHEQ system (online)</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW Work Pack, Pier bracket Installation and Relocation, 15/09/23 activity finish 31/12/24</p> <p>SCAW Work Pack, Piers and Capital Works near waters, 12/10/23</p> <p>SCAW Work Pack, Pilling Works in unnamed creek, 05/09/23</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>AEW FSM Construction Environmental Management Plan, Laing O'Rourke, 15/03/24</p> <p>Laing O'Rourke, Field View (checklist and inspection module), (online)</p> <p>FSM Possession Packs WE38, WE44, WE 48, covers noise and vibration, heritage, waste and stockpiling and communications</p> <p>FSM OOHW permits WE38, WE44, WE47 .</p>	<p>SBT indicates that there have not been any day time works that were likely to have triggered this requirement during the audit period. OOHW have been approved via the EPL. SBT recorded one non-compliance with hours of work. Refer E41.</p> <p>SCAW have not identified any highly noise intensive works that result in exceedances of the NML. AEW Water has some activities predicted to present high noise activities but these had not commenced at the time of the audit. AEW SPO and AEW FSM did not have any highly noise intensive activities during the audit period.</p> <p>Several noise complaints have been received but the Auditor does not consider this to be excessive, and the responses appear appropriate.</p>	

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					ER Monthly Reports for February – July 24 Complaints register current to 16/08/24		
E40	This approval does not permit blasting.	Applicable	Applicable	Applicable	SBT interview 07-08/08/24 SCAW interview 09/08/24 Sydney Metro interview 05-09/08/24	The auditees are not aware of any blasting.	NT
E41	<p>Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances:</p> <p>(a) Safety and Emergencies, including:</p> <ul style="list-style-type: none"> (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 <p>(b) Low impact, including:</p> <ul style="list-style-type: none"> (i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and (ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or <p>(c) By Approval, including:</p> <ul style="list-style-type: none"> (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 <p>(d) By Prescribed Activity, including:</p> <ul style="list-style-type: none"> (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunneling) 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. <p>On becoming aware of the need for emergency work in accordance with (a)(ii) 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.</p> <p>Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery</p>	Applicable	Applicable	Applicable	<p>SBT NSW (Off-airport) Construction Noise and Vibration Management Sub-plan, 20/02/24 (SBT NVMP) including Noise and Vibration Monitoring Program</p> <p>SBT interview 07-08/08/24</p> <p>SBT EPL 21672</p> <p>SBT OOHW Application proforma</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT Toolbox Talk register, Jan – August 24 (environmental toolbox talk register, showing 16 x enviro toolbox deliveries in last 8 months covering dust management, site hives, incidents, groundwater, TBM retrieval chemical storage, water discharge and OOHW)</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT OOHW register, current to Aug 24</p> <p>SBT Permit application register (includes clearing, dewatering, 12x OOHW permits), current to July 24.</p> <p>SBT Non-compliance report 21/04/24 (identified 29/04/24) and submission to DPHI 06/05/24)</p> <p>Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21/09/23 and ER letter of endorsement 11/10/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW EPL 21695</p> <p>SCAW OOHW permit register, 24 - 43, current to 09/08/24 and associated OOHW permits and monitoring records .</p> <p>SCAW consolidated monitoring result register, 30/07/23</p>	<p>SBT indicates that all OOHW during the audit period have been conducted under conditions L5.1 – L5.11 of EPL 21672. The OOHW Permit Application Register identifies each OOHW activities approved for the audit period. The OOHW application process includes justification, assessment, controls to be applied (where applicable), notification requirements, cumulative impact consideration and authorization.</p> <p>Non-compliance SBT: On 21/04/24 3 separate incidents of Sydney Earthworks-owned spoil haulage trucks entering Orchard Hills site between 6.30am-7am via Gate K3 on Kent Road. This resulted in a community stakeholder complaint being received on 22/04/24. This was reported to Sydney Metro and EPA and at the time CPBG investigated the complaint as to whether the three spoil trucks from Sydney Earthworks identified as coming into site prior to 07:00am constituted a non-compliance. On 29/04/24 this was confirmed. On 06/05/24 this was reported to the Department in accordance with A44/A45. The auditees are not aware of any response from the Department or EPA in relation to the matter. SBT removed one driver from site and warned the other two drivers.</p> <p>SCAW indicates that all OOHW during the audit period to be conducted under L5.1 – L5.8 of EPL 21695. All OOHW conducted during the audit period were assessed as being low impact under the EPL, or covered under a DNVIS. The OOHW application process includes justification, assessment, controls to be applied (where applicable), notification requirements, cumulative impact consideration and authorization. There does not appear to be OOHW that do not fit the requirements of this condition. Monitoring conducted indicates that results were below that predicted in the noise assessment.</p> <p>FSM has conducted several weekend possessions which have involved OOHW and were conducted as per the approved OOHW Protocol. For each the relevant assessment has been conducted and approval received. No complaints have been received in relation to noise from these works.</p>	NC

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					<p>Complaints register current to 16/08/24</p> <p>Sydney Metro interview 05-09/08/24</p> <p>FSM OOHW permits WE38, WE44, WE47 .</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p>		
E42	<p>An Out-of-Hours Work Protocol 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 Conditions E38 and E39. 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 style="margin-left: 20px;">(i) the ER reviews all proposed out-of-hours activities and confirms their risk levels;</p> <p style="margin-left: 20px;">(ii) low risk activities that can be approved by the ER; and</p> <p style="margin-left: 20px;">(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 Condition E56. 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 Condition E41 are met.</p> <p>Note: Out-of-hours work is any work that occurs outside the construction hours identified in Condition E38 and E39.</p>	Applicable	Applicable	Applicable	<p>Sydney Metro Western Sydney Airport Out of Hours Works Protocol, Sydney Metro, 08/11/21</p> <p>Letter DPHI to Sydney Metro, 11/11/21 (approval of OOHW Protocol)</p> <p>Sydney Metro interview 05-09/08/24</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p> <p>FSM OOHW permits WE38, WE44, WE47 .</p>	<p>The overarching OOHW Protocol was developed and approved prior to the current audit period.</p> <p>Both SBT and SCAW operate under their EPLs and do not use the OOHW Protocol.</p> <p>The FSM OOHW conducted during the audit period have been conducted in accordance with the approved OOHW Protocol.</p>	C
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); (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 Noise and Vibration CEMP Sub-plan.</p> <p>Note: 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.</p>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SBT Groundborne noise monitoring report, Renzo Tonin, 30/05/24</p>	<p>SBT Sites have had hoarding installed as per the DNVISs. St Marys had a small acoustic shed at the top of the box to allow concrete deliveries during OOH. The works at this site were completed and handed over to SSTOM in October 23. Solar powered light towers are being used on occasion. Noise blankets were installed on noisy plant including generators and scrubber fans. All plant is assessed through the Chek Rite system which verifies that the plant is well maintained and fitted with non-tonal beacons. Plant sound power levels are being checked to ensure they are below the predicted levels. Noise monitoring at receiver has not identified construction noise as being excessive. The SBT auditees have not identified any vibration intensive works or activities within the safe working distances of plant. Hammering of the shafts and boxes are not proximal to receivers and material is soft. Cross passage and tunneling GBN and vibration results were largely compliant, with only minor short term elevated results recorded (below human comfort criteria). SBT OOHW appear to have had the relevant mitigation measures applied (noise blankets installed, notification to receivers and verification monitoring etc.) this appears to have been implemented (noting that the auditor has not attended OOHW). At Claremont Meadows utilize an electric crane (particularly at OOHW) and the hoarding height was extended for OOHW. Several noise complaints were received during the audit period. These do not appear to be excessive and the response appears to have been adequate. Refer E41 regarding early truck arrivals.</p>	C

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					<p>SBT Groundborne noise monitoring report (Derwent Road complaint response), Renzo Tonin, 09/07/24</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT Plant sound power level monitoring results (no date)</p> <p>OOHW photos for Orchard Hills (permit 110) and St Marys TBM retrieval works.</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Survey and Utility Investigation Works, 21/09/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Material Delivery and Stockpiling, 23/02/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, OOHW deliveries at Elizabeth Drive, 09/01/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 26/07/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21/09/23 and ER letter of endorsement 11/10/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW Work Pack, Pier bracket Installation and Relocation, 15/09/23 activity finish 31/12/24</p> <p>SCAW Work Pack, Piers and Capital Works near waters, 12/10/23</p> <p>SCAW Work Pack, Pilling Works in unnamed creek, 05/09/23</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p> <p>FSM OOHW permits, 15/08/23, 15/11/23</p>	<p>The SCAW DNVISs identify controls to be applied and these are checked via inspection and monitoring. SCAW standard construction hours works have been measured as being compliant with the applicable criteria. The works are not proximal to sensitive receivers (with the exception of 16-20 Lansdowne Road during some minor road works), and therefore impacts are limited. The monitoring report for Lansdowne Road shows compliant vibration during construction. The OOHW applications have identified predominantly compliant noise and vibration levels or have been completed under a community agreement. Refer E41/E57. No noise complaints recorded for the audit period.</p> <p>The noise risk from FSM is limited. No complaints have been received in relation to noise or vibration from these works.</p>	

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					FSM environmental inspections, 18/12/23, 10/01/24, 15/01/24, 18/11/23		
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 Noise and Vibration CEMP Sub-plan, including in any Out-of-Hours Work Protocol, required by Condition E42.</p>	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Groundborne noise monitoring report, Renzo Tonin, 30/05/24</p> <p>SBT Groundborne noise monitoring report (Derwent Road complaint response), Renzo Tonin, 09/07/24</p>	<p>The SBT Tunnelling DNVIS identifies a number of receivers that are predicted to experience ground borne noise above the adopted criteria for tunnelling and cross passage excavation. Ground borne noise mitigation measures are included in Section 6.3.3 of the DNVIS and Sections 6 and 8 of the approved Noise and Vibration Management Sub-plan. Ground borne noise monitoring was conducted by Renzo Tonin during the audit period. For each the measured results were below the criteria.</p> <p>Ground-borne noise is not anticipated to be an impact on SCAW or the FSM packages as these involve surface works.</p>	C
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>	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SCAW Noise and Vibration Management Sub-plan, 19/06/24 (SCAW NVMP) including noise and vibration monitoring program and records of consultation, revised in response to Sydney Metro and ER comments</p> <p>SCAW Land Use Survey, Resonate, 05/08/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Survey and Utility Investigation Works, 21/09/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Material Delivery and Stockpiling, 23/02/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, OOHW deliveries at Elizabeth Drive, 09/01/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove's Creek to Paton's Lane, 26/07/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21/09/23 and ER letter of endorsement 11/10/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Lansdowne Road / Samuel Marsden Earthworks &</p>	<p>None of the DNVIS' identify any sensitive land uses listed in this condition as exceeding applicable NMLs. If there are no changes to the SCAW, SBT and FSM scopes, this requirement could be considered closed.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23. AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23		
E46	<p>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:</p> <p>(a) use of regularly serviced low sound power equipment;</p> <p>(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;</p> <p>(c) use of non-tonal reversing alarms; and</p> <p>(d) use of alternative construction and demolition techniques.</p>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SBT Groundborne noise monitoring report, Renzo Tonin, 30/05/24</p> <p>SBT Groundborne noise monitoring report (Derwent Road complaint response), Renzo Tonin, 09/07/24</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT Plant sound power level monitoring results (no date)</p> <p>OOHW photos for Orchard Hills (permit 110) and St Marys TBM retrieval works.</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Survey and Utility Investigation Works, 21/09/22</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Material Delivery and Stockpiling, 23/02/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, OOHW deliveries at Elizabeth Drive, 09/01/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 26/07/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement, Sandstone Delivery and Placement for Cosgroves Creek to Patons Lane and Defence Establishment Orchard Hills & Haul Road Drainage Crossing, 21/09/23 and ER letter of endorsement 11/10/23</p>	<p>SBT Sites have had hoarding installed as per the DNVISs. St Marys had a small acoustic shed at the top of the box to allow concrete deliveries during OOH. The works at this site were completed and handed over to SSTOM in October 23. Solar powered light towers are being used on occasion. Noise blankets were installed on noisy plant including generators and scrubber fans. All plant is assessed through the Chek Rite system which verifies that the plant is well maintained and fitted with non-tonal beacons. Plant sound power levels are being checked to ensure they are below the predicted levels. Noise monitoring at receiver has not identified construction noise as being excessive. The SBT auditees have not identified any vibration intensive works or activities within the safe working distances of plant. Hammering of the shafts and boxes are not proximal to receivers and material is soft. Cross passage and tunneling GBN and vibration results were largely compliant, with only minor short term elevated results recorded (below human comfort criteria). SBT OOHW appear to have had the relevant mitigation measures applied (noise blankets installed, notification to receivers and verification monitoring etc.) this appears to have been implemented (noting that the auditor has not attended OOHW). At Claremont Meadows utilize an electric crane (particularly at OOHW) and the hoarding height was extended for OOHW. Several noise complaints were received during the audit period. These do not appear to be excessive and the response appears to have been adequate. Refer E41 regarding early truck arrivals.</p> <p>Observation SBT: There were 9 x complaints (from 1x receiver on Kent Road) regarding compression braking at Orchard Hills in the complaints register.</p> <p>The Auditor observes that whilst compression braking is a heavy vehicle safety feature and not prohibited on site, the NSW EPA states that exhaust brakes, engine compression or 'jake' brakes near residential areas and noise-sensitive areas such as hospitals and schools should be avoided, unless they are necessary for safety reasons.</p> <p>The SCAW DNVISs identify controls to be applied and these are checked via inspection and monitoring. SCAW standard construction hours works have been measured as being compliant with the applicable criteria. The works are not proximal to sensitive receivers and therefore impacts are limited. The OOHW applications have identified predominantly compliant noise and vibration levels or have been completed under a community agreement. Refer E41/E57. no noise complaints recorded for the audit period.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW Detailed Noise and Vibration Impact Statement, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW weekly synergy reports (inspection register)</p> <p>SCAW Work Pack, Pier bracket Installation and Relocation, 15/09/23 activity finish 31/12/24</p> <p>SCAW Work Pack, Piers and Capital Works near waters, 12/10/23</p> <p>SCAW Work Pack, Pilling Works in unnamed creek, 05/09/23</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p> <p>FSM Possession Packs WE38, WE44, WE 48, covers noise and vibration, heritage, waste and stockpiling and communications</p> <p>FSM OOHW permits WE38, WE44, WE47 .</p> <p>FSM environmental inspections, 18/12/23, 10/01/24, 15/01/24, 18/11/23</p>	<p>The noise risk from FSM is limited. No complaints have been received in relation to noise or vibration from these works.</p>	
E47	<p>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.</p>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SBT time lapse photos (various)</p> <p>SBT Chek Rite online plant assessment module</p>	<p>Refer to Independent Audit No. 3 - 5 for the status of preparation of DNVISs, submission to the ER and department / EPA for earlier audit periods.</p> <p>During the audit period SBT updated two DNVISs and SCAW updated / prepared two DNVISs. Each has been provided to the ER prior to the triggering works commencing, or have yet to commence.</p> <p>During the audit period SCAW updated 1 DNVIS and utilized 2 DNVIS. Both we submitted to the ER prior to the relevant works commencing.</p> <p>The auditees are not aware of the Department or EPA requesting copies of any other DNVISs. All the DNVISs are presented on line on the Sydney Metro and contractor websites.</p>	C

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					<p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SBT Plant sound power level monitoring results (no date)</p> <p>Acoustic shed monitoring results, 07/08/23</p> <p>SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24)</p> <p>SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p> <p>FSM OOHW permits, 15/08/23, 15/11/23</p> <p>FSM environmental inspections, 18/12/23, 10/01/24, 15/01/24, 18/11/23</p>		
E48	<p>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.</p>	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout</p>	<p>The SBT have not identified any properties at risk of exceeding the screening criteria for cosmetic damage for the current scope of works. SCAW had one property (16-20 Lansdowne Road) at risk. Monitoring results demonstrated that vibration was compliant with relevant criteria.</p> <p>The AEW FSM identifies the cosmetic damage screening criteria have the potential to be exceeded at the following St Marys Station structures:</p> <ul style="list-style-type: none"> • St Marys Commuter Car Park • Platforms 1/2 and 3/4 (Heritage listed - 1888 & 1942-3) • Platforms 3/4 building (Heritage Listed - 1888). <p>For the St Marys Station platform and building: Direct impacts on the platform are required to install the FSM foundations. No monitoring is required on this structure according to the approved AEW FSM CEMP. Monitoring is required on the platform building. Heritage advice has been sought and presented in Section 4.2.6 of the Heritage Procedure within the AEW FSM CEMP. Monitoring has been conducted and results have been satisfactory.</p>	C

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					<p>Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24)</p> <p>SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p>		
E49	<p>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 land use(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.</p> <p>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.</p>	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24)</p> <p>SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24).</p>	<p>SBT DNVIS's have not identified sensitive land use(s) in Appendix B as exceeding the highly noise affected criteria during typical case construction for the works conducted during the audit period <u>and</u> utilising the controls that have been adopted (noise walls, acoustic shed etc.).</p> <p>SCAW reviewed the scenarios whereby this could be triggered for its scope of works (the only area within their scope potentially triggering this is in Orchard Hills at 16-20 Lansdowne Road). A DNVIS was prepared and specific mitigation measures have been developed in consultation with the stakeholder (beyond the standard mitigations). A colorbond fence will be installed. The receiver has not requested any additional noise barrier or at-property treatment, despite being made aware that the colorbond fence would not provide attenuation recommended by the DNVIS. These works have largely been completed and the receiver did not raise any complaints.</p> <p>According to the AEW FSM DNVIS, this requirement has not been triggered.</p>	NT

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					https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road) AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)		
E50	<p>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:</p> <p>(a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feasible and reasonable;</p> <p>(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</p> <p>(c) the doors of acoustic sheds would be kept closed during the night-time period. Where nighttime vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.</p>	Applicable	Not Applicable	Not Applicable	Site inspection 02, 05/08/24 SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 SBT acoustic shed design documents (various) Acoustic shed monitoring results, 07/08/23 Email Renzo Tonin to SBT, 18/08/23 (confirmation on acoustic shed performance)	1 x small acoustic shed had been established at St Marys for concrete pours into the shaft (as identified in the St Marys DNVIS). It appears as though the acoustic shed is using a lower specification corrugated iron than that stated in the DNVIS. That being said, acoustic monitoring was conducted and the acoustic consultant stated that the shed is performing better than expected. Therefore, the model is validated and no further action is required. There were no complaints received in relation to activities in or around the shed. The SBT works at St Marys were completed and handed over to SSTOM in October 23.	NT
E51	<p>Where Condition E49 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.</p> <p>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.</p> <p>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.</p>	Applicable	Applicable	Applicable	SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23) SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023 SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24. SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24 SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24) SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement). SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24 SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24) SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23. SCAW consolidated monitoring result register, 30/07/24 SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24).	SBT DNVIS's have not identified sensitive land use(s) in Appendix B as exceeding the highly noise affected criteria during typical case construction for the works conducted during the audit period <u>and</u> utilising the controls that have been adopted (noise walls, acoustic shed etc.). SCAW reviewed the scenarios whereby E49 could be triggered for its scope of works (the only area within their scope potentially triggering this is in Orchard Hills at 16-20 Lansdowne Road). A DNVIS was prepared and specific mitigation measures have been developed in consultation with the stakeholder (beyond the standard mitigations). A colorbond fence will be installed. The receiver has not requested any additional noise barrier or at-property treatment, despite being made aware that the colorbond fence would not provide attenuation recommended by the DNVIS. These works have largely been completed and the receiver did not raise any complaints. According to the AEW FSM DNVIS, this requirement has not been triggered.	NT

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					https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road) AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)		
E52	Any offer for at-property treatment or the application of other noise mitigation measures in accordance with Condition E51, does not expire until the noise impacts specified in Condition E49, affecting that property are completed, even if the landowner initially refuses the offer. Note: If an offer has been made but is not accepted, this does not preclude the commencement of construction under Condition E49.	Applicable	Applicable	Applicable	SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23) SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023 SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24. SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24 SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24) SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement). SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24 SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24) SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23. SCAW consolidated monitoring result register, 30/07/24 SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)	SBT DNVIS’s have not identified sensitive land use(s) in Appendix B as exceeding the highly noise affected criteria during typical case construction for the works conducted during the audit period <u>and</u> utilising the controls that have been adopted (noise walls, acoustic shed etc.). SCAW reviewed the scenarios whereby E49 could be triggered for its scope of works (the only area within their scope potentially triggering this is in Orchard Hills at 16-20 Lansdowne Road). A DNVIS was prepared and specific mitigation measures have been developed in consultation with the stakeholder (beyond the standard mitigations). A colorbond fence will be installed. The receiver has not requested any additional noise barrier or at-property treatment, despite being made aware that the colorbond fence would not provide attenuation recommended by the DNVIS. These works have largely been completed and the receiver did not raise any complaints. According to the AEW FSM DNVIS, this requirement has not been triggered.	NT

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)		
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.	Applicable	Applicable	Applicable	<p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Tunnelling, August 2023 (and submission to ER 20/07/23)</p> <p>SBT Detailed Noise and SBT Detailed Noise and Vibration Impact Statement - Orchard Hills Tunnel Support Worksite, July 2023</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023 and addendum for TBM retrieval 09/04/24 and submission to ER 10/04/24.</p> <p>SBT Detailed Noise and Vibration Impact Statement - Claremont Meadows Ventilation Facility, September 2023, including addendum 14/02/24 and ER endorsement 22/02/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - Aerotropolis Core Station, April 2023 and Addendum for TBM retrieval works 22/05/24 (and submission to ER, 03/05/24)</p> <p>SBT Detailed Noise and Vibration Impact Statement - Bringelly Services Facility, 19/02/24 (including ER endorsement).</p> <p>SBT Noise and Vibration Monitoring Report, Nov 23 – Apr 24, 29/05/24</p> <p>SCAW Detailed Noise and Vibration Impact Statement No. 4, Warragamba Pipeline Works, Luddenham Roundabout Works and Full Viaduct Alignment – Cosgrove’s Creek to Paton’s Lane, 29/04/24 (and ER submission 17/05/24)</p> <p>SCAW Detailed Noise and Vibration Impact Statement No 6, Lansdowne Road / Samuel Marsden Earthworks & Structure Works, 13/11/23 and ER Letter of endorsement 23/11/23.</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>Letter Resonate to CPBUI, 13/08/24 (vibration monitoring report for 16-20 Lansdowne Road)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)</p>	<p>SBT DNVIS’s have not identified sensitive land use(s) in Appendix B as exceeding the highly noise affected criteria during typical case construction for the works conducted during the audit period <u>and</u> utilising the controls that have been adopted (noise walls, acoustic shed etc.).</p> <p>SCAW reviewed the scenarios whereby E49 could be triggered for its scope of works (the only area within their scope potentially triggering this is in Orchard Hills at 16-20 Lansdowne Road). A DNVIS was prepared and specific mitigation measures have been developed in consultation with the stakeholder (beyond the standard mitigations). A colorbond fence will be installed. The receiver has not requested any additional noise barrier or at-property treatment, despite being made aware that the colorbond fence would not provide attenuation recommended by the DNVIS. These works have largely been completed and the receiver did not raise any complaints.</p> <p>According to the AEW FSM DNVIS, this requirement has not been triggered.</p>	C
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.	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023</p>	<p>It is understood based on the evidence sighted that the only heritage item in the safe working distance of SBT construction during the audit period is the Goods Shed at St Marys and the St Marys Station platform and building.</p> <p>For the Goods Shed Sydney Metro sought advice of Transport for NSWs Heritage Specialist on vibration impacts and monitoring. The Heritage Specialist confirmed that vibration monitoring installed was</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Email chain, Transport to Sydney Metro, 02/03/21 – 31/05/21 (Transport Heritage Advisor advice on vibration impact on the Goods Shed)</p> <p>Email Chain AMBS and Sydney Metro, 27/01/23 – 03/02/23 (heritage advice on installation of 'crack meters' at the Goods Shed)</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SCAW Warragamba Pipeline Vibration Assessment Report, Douglas Partners, 25/08/23</p> <p>SCAW Warragamba Vibration Monitoring Reports, Douglas Partners, 26/10/23 – 16/01/24 (vibration monitoring on Warragamba pipeline, results all satisfactory).</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM CEMP)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p>	<p>as per the <i>Sydney Trains Technical Note for the Installation of New Electrical and Data Services at Heritage Sites</i>. More recently, advice was sought from Sydney Metro on the installation of crack meters at the Goods Shed. On 02/02/23 the Heritage Specialist from AMBS confirmed the method to be adopted was acceptable. One minor vibration exceedance was recorded on the Goods Shed during the sixth audit period (triggering the level for investigation, not an exceedance of the DIN/BS criteria in the NVMP). no adverse impact was identified by SBT. Note that SSTOM has control of the vibration logger for all periods excluding the time of TBM breakthrough and retrieval).</p> <p>For the Warragamba Pipeline (SCAW works), the Douglas Partners assessment report identified relevant criteria and recommendations around static drum rolling within safe working distances of the pipeline (associated with establishment of the crane pad). Monitoring was conducted during the works, with the results being satisfactory. There have been no works requiring vibration testing during the sixth audit period.</p> <p>For the St Marys Station platform and building: Direct impacts on the platform are required to install the FSM foundations. No monitoring is required on this structure according to the approved AEW FSM CEMP. Monitoring is required on the platform building. Heritage advice has been sought and presented in Section 4.2.6 of the Heritage Procedure within the AEW FSM CEMP. Monitoring has been conducted and results have been satisfactory.</p>	
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.	Not Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SBT Detailed Noise and Vibration Impact Statement - St Marys Station, February 2023</p> <p>Email chain, Transport to Sydney Metro, 02/03/21 – 31/05/21 (Transport Heritage Advisor advice on vibration impact on the Goods Shed)</p> <p>Email Chain AMBS and Sydney Metro, 27/01/23 – 03/02/23 (heritage advice on installation of 'crack meters' at the Goods Shed)</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p>	<p>It is understood based on the evidence sighted that the only heritage item in the safe working distance of SBT construction during the audit period is the Goods Shed at St Marys and the St Marys Station platform and building.</p> <p>For the Goods Shed Sydney Metro sought advice of Transport for NSWs Heritage Specialist on vibration impacts and monitoring. The Heritage Specialist confirmed that vibration monitoring installed was as per the <i>Sydney Trains Technical Note for the Installation of New Electrical and Data Services at Heritage Sites</i>. More recently, advice was sought from Sydney Metro on the installation of crack meters at the Goods Shed. On 02/02/23 the Heritage Specialist from AMBS confirmed the method to be adopted was acceptable. One minor vibration exceedance was recorded on the Goods Shed during the sixth audit period (triggering the level for investigation, not an exceedance of the DIN/BS criteria in the NVMP). no adverse impact was identified by SBT. Note that SSTOM has control of the vibration logger for all periods excluding the time of TBM breakthrough and retrieval).</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW Warragamba Pipeline Vibration Assessment Report, Douglas Partners, 25/08/23</p> <p>SCAW Warragamba Vibration Monitoring Reports, Douglas Partners, 26/10/23 – 16/01/24 (vibration monitoring on Warragamba pipeline, results all satisfactory).</p> <p>Memo, AMBS to SCAW, 26/07/23 (advice on installation of vibration monitors on heritage items, including Warragamba pipeline)</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24</p> <p>Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM CEMP)</p> <p>AEW FSM Detailed Noise and Vibration Impact Statement, 05/07/23 and Letter HBI to Sydney Metro, 25/05/23 (ER endorsement of AEW FSM DNVIS)</p> <p>FSM Noise and Vibration Monitoring Result Register current to 29/05/24</p>	<p>For the Warragamba Pipeline (SCAW works), heritage specialist advice was sought regarding the monitoring. The advice was to ensure the monitors are fixed in a way that does not damage the item. The Douglas Partners assessment report identified the method of fixing (taping) which is consistent with the heritage advisor's advice. The Assessment Report also identified relevant criteria and recommendations around static drum rolling within safe working distances of the pipeline. Monitoring was conducted during the works, with the results being satisfactory. There have been no works requiring vibration testing during the sixth audit period.</p> <p>For the St Marys Station platform and building: Direct impacts on the platform are required to install the FSM foundations. No monitoring is required on this structure according to the approved AEW FSM CEMP. Monitoring is required on the platform building. Heritage advice has been sought and presented in Section 4.2.6 of the Heritage Procedure within the AEW FSM CEMP. Monitoring has been conducted and results have been satisfactory.</p>	
E56	<p>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:</p> <p>(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</p> <p>(b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and</p> <p>(c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation</p> <p>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.</p>	Not Applicable	Applicable	Applicable	<p>CICG Meeting Minutes and Presentations, Mar - Jul 24</p> <p>Sydney Metro Monthly Cumulative Impacts Monthly Meeting, Mar - Jul 24</p> <p>ER Monthly Reports for February – July 24</p> <p>Complaints register current to 16/08/24</p>	<p>Sydney Metro holds a monthly cumulative impacts contractor meeting held with metro and contractors. This ensures coordination and respite NOTE: This does not include third parties (e.g.: John Holland / Sydney Water, WSA, M12).</p> <p>Sydney Metro holds fortnightly meetings with its major contractors and the ERs to discuss a variety of environmental issues, including potential for cumulative impacts.</p> <p>Communications Interface Coordination Groups (CICG) meet monthly to discuss upcoming works and potential for cumulative impacts. Where upcoming works are likely to overlap, this triggers the need for further discussion and review of potential scheduling and impact. The CICG is undergoing an update to allow all Metro WSA OOHW plus those from WSACo, M12 and Sydney Water etc. This is a positive development with respect to managing cumulative impacts across the alignment.</p>	C
E57	<p>In order to undertake out-of-hours work outside the work hours specified under Condition E38, 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:</p> <p>(a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work;</p> <p>(b) a description of the potential work, location and duration of the out-of-hours work;</p> <p>(c) the noise characteristics and likely noise levels of the work; and</p> <p>(d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition E43 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).</p> <p>The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER, EPA and the Planning Secretary prior to the out-of-hours work commencing.</p> <p>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.</p>	Not Applicable	Applicable	Applicable	<p>https://www.sydneymetro.info/station/st-marys-metro-station</p> <p>https://www.sydneymetro.info/station/claremont-meadows-intermediate-services-facility</p> <p>https://www.sydneymetro.info/station/orchard-hills-station</p> <p>https://www.sydneymetro.info/station/orchard-hills-stabling-and-maintenance-facility</p> <p>https://www.sydneymetro.info/station/luddenham-station</p> <p>https://www.sydneymetro.info/station/bringelly-services-facility</p> <p>https://www.sydneymetro.info/station/aerotropolis-station</p> <p>Letter Sydney Metro to DPHI, 25/04/23 (Sydney Metro written advice on process to be adopted for OOHW under community agreement)</p> <p>SBT E57 report St Marys tunnelling, April 24</p> <p>Email DPHI to Sydney Metro, 04/04/24 (clarification on interpretation of E57).</p>	<p>Refer to the third Independent Audit Report regarding Sydney Metro's interpretation of this requirement. This has since been clarified by the Department in April 2024 – requiring E57 reports to be prepared for all OOHW above 5db(A) above BG (clarified after the St Marys tunnelling E57 report / works).</p> <p>The monthly updates are issued to potentially affected receivers and the consultation includes the information required by this condition.</p> <p>SBT triggered this requirement during the audit period. Consultation and offers of respite was completed. The information was submitted to the ER and Department. The auditees are not aware of any directions from the regulators in response.</p>	NC

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					<p>SBT E57 report Aero TBM retrieval, May 24 (plus submission to EPA and ER, 27/05/24 and DPHI 27/05/24)</p> <p>SBT E57 report Orchard Hills Road works, March 24 (plus submission to EPA and ER, 18/03/24 and DPHI portal lodgement 18/03/24)</p> <p>SBT E57 report St Marys TBM retrieval, March 24 (plus submission to EPA and ER, 17/05/24 and DPHI portal lodgement 22/05/24)</p> <p>SBT E57 report Bringelly tunnelling, April 24 (plus DPHI portal lodgement 15/03/24)</p> <p>SCAW E57 report Luddenham Road round about pavement works, Rev A (and submission to EPA 29/04/24, DPHI on 29/04/24, ER on 24/04/24)</p> <p>SCAW E57 report Luddenham South Cosgrove Creek earthworks night, Rev 1 for OOHW permit 28 (and submission to EPA 20/05/24, DPHI on 20/05/24, ER on 14/05/24)</p> <p>SCAW E57 report viaduct works / Warragamba pipeline, rev 1 (and submission to ER on 22/07/24)</p> <p>SCAW Non-compliance report 25/07/24 (and submission to DPHI on 25/07/24) for failure on submissions of SCAW E57 report viaduct works / Warragamba pipeline.</p> <p>FSM E57 reports, 15/03/24 (WE38), 24/04/24 (WE44), 17/05/24 (WE47)</p> <p>DPHI portal lodgement 03/04/24 WE38), 24/04/24 (WE38), 17/05/24 (WE47)</p> <p>Email LORAC to ER, 15/03/24 (WE38), 17/05/24 (WE47), 24/04/24 (WE44)</p> <p>Email LORAC to EPA 15/03/24 (WE38), 24/04/24 (WE44), 17/05/24 (WE47)</p>	<p>Non-compliance SCAW: On 25/07/24 SCAW identified that the E57 report prepared for was not submitted to the Department prior to the relevant OOHW commencing. Further, the report was not submitted to the EPA at all (due to this not being required under the terms of the EPL). This was reported in accordance with A44/A45.</p> <p>AEW FSM prepared three E57 reports and these were submitted to the identified stakeholders. To the auditors knowledge there were no responses from the stakeholders.</p>	
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);</p> <p>(b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately calibrated noise model;</p> <p>(c) identify sensitive landuses that are predicted to exceed:</p> <ul style="list-style-type: none"> (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); <p>(d) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on:</p> <ul style="list-style-type: none"> (i) source control and design; (ii) at the receiver (if relevant); and (iii) 'best practice' achievable noise and vibration outcome for each activity; 	Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction, no operational noise mitigation has been installed during the audit period.	NT

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	<p>(e) describe how the final suite of mitigation measures will achieve:</p> <ul style="list-style-type: none"> (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); <p>(f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures being offered;</p> <p>(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>Note: 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 Place, Urban Design and Corridor Landscape Plan required under Condition E79.</p>						
E59	<p>Operational noise mitigation measures as identified in Condition E58 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. 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>The report must be submitted to the Planning Secretary within six months of submitting the ONVR.</p> <p>Note: Not having finalised detailed design is not sufficient justification for not implementing the proposed mitigation measures.</p>	Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction, no operational noise mitigation has been installed during the audit period.	NT
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 Condition E58. An Operational Noise and Vibration Compliance Report (ONVCR) must be prepared to document this monitoring and include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E58; (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; (c) a review of the performance of the CSSI against the: <ul style="list-style-type: none"> (i) operational noise levels in terms of criteria and noise goals established in the NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017); (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (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); (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; (f) identification of: <ul style="list-style-type: none"> (i) additional measures to meet the criteria outlined in the NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017), (ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (iii) when these measures are to be implemented; and (iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. <p>The ONVCR 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>	Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction.	NT

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	Note: Refer to Condition B5 about how personal information will be handled.						
Place, Urban Design, and Visual Amenity							
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	Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24 Complaints register current to 16/08/24	The St Marys site was handed over to SSTOM in October 23 and this sixth audit does not include SSTOM (covered by a separate audit and audit report).	C
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.	Applicable	Applicable	Applicable	Site inspection 02, 05/08/24 Independent Audit No 3, WolfPeak, 23/03/23 Complaints register current to 16/08/24	Refer to the finding from the third Independent Audit with respect to details on the extent of application of mitigation measures at construction compounds. The Auditor is of the view that compliance has been achieved, observing however that some mitigations have been deemed not practicable. Two complaints were received during the audit period regarding light spill (at Orchard Hills and Bringelly). In both cases lighting was adjusted and there were no repeat complaints / issues recorded.	C
E63	The CSSI must be designed with consideration of: (a) the design objectives, principles and guidelines identified in documents listed in Condition A1; (b) the principles and objectives of the draft Connecting with Country Framework; (c) relevant land use changes, masterplans and initiatives, where this information is known and/or available; (d) existing and proposed future local context and character; and (e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined. Responses to items (a) – (e) must be reviewed by the Design Review Panel (DRP) to inform the design of permanent built works and landscape design of the CSSI. The outcome of the DRP review must be provided to the Planning Secretary prior to the submission of the Place, Urban Design and Corridor Landscape Plan (PUDCLP). Note: In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.	Applicable	Applicable	Applicable	SBT interview 07-08/08/24 Letter DPHI to Metro, 14/12/22 (acknowledgement of submission of Design Review Panel Process). SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) SCAW PUDCLP, December 2022 SCAW PUDCLP portal submission record, 19/12/22 Letter Govt Architect E63, 30/11/22 Letter DPHI to Sydney Metro, 30/01/23 (DPHI RFI on PUDCLP) Letter CPBUI to DPHI, 06/03/23 (CPBUI response to DPHI RFI re Council consultation) DPHI portal RFI, PA166 (Additional RFI from DPHI re Council consultation) Letter Sydney Metro to DPHI, 18/04/23 (Sydney Metro response to additional RFI re Council consultation) Letter DPHI to Sydney Metro, 10/05/23 (acceptance of response to additional RFI re Council consultation) FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule). GANSW Letter of advice, Feb - Jul 24	SBT does not construct any elements that trigger this condition. SCAW prepared a document demonstrating that the design was assessed against the requirements of this condition, and that it was provided to the Design Review Panel (DRP) for review. The DRP provided a range of recommendations and for each SCAW and Sydney Metro provided a response. Whilst most of the recommendations were addressed, there are a range of recommendations that weren't adopted. The lack of uptake of some recommendations were supported by a justification (e.g.: due to the recommendation being not applicable to the SCAW scope of works or that the recommendation would be addressed in subsequent design developments). However, there are other recommendations that were not adopted and did not have an associated justification. The Auditor observes that there is no requirement to adopt all the recommendations from the DRP, and that Government Architect (representing the DRP) noted that not all recommendations were adopted by SCAW and Sydney Metro in its final response. The outcome of the DRP review was submitted to the Department (prior to submission of the PUDCLP) and to the Auditor's knowledge the Department did not take issue with the matter (refer E77). The FSM initial design presentation from April 2023 includes preliminary design and a schedule. The DRP has received regular updates to design throughout the DRP presentations. The DRP has provided feedback, requesting that certain elements of the design be refined. FSM continues to update design in response to the DRP feedback. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.	C
E64	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: (a) ASINZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces; (b) NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports; and (c) NASF Guideline C: Managing the risk of wildlife strikes in the vicinity of airports.	Applicable	Applicable	Applicable	Complaints register current to 16/08/24 SBT Construction Environmental Management Plan, 15/03/24 (SBT CEMP) SCAW Visual Amenity Management Plan (VAMP), 19/10/22	The SBT CEMP, SCAW VAMP, AEW FSM CEMP recognizes this requirement. Refer to the finding from the third Independent Audit with respect to details on the extent of application of mitigation measures at construction compounds. The Auditor is of the view that compliance has been achieved, observing however that some mitigations have been deemed not practicable.	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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.				AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24	Two complaints were received during the audit period regarding light spill (at Orchard Hills and Bringelly). In both cases lighting was adjusted and there were no repeat complaints / issues recorded.	
E65	Designs must have regard to the Movement and Place Framework relevant guidance including the Walking Space Guide: Towards Pedestrian Comfort and Safety (TfNSW, 2020) and the Cycleway Design Toolbox: Designing for Cycling and Micromobility (TfNSW, 2020)	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)	This requirement is not triggered by AEW, SBT or SCAW.	NT
E66	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 (Austroads, 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.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)	This requirement is not triggered by AEW, SBT or SCAW.	NT
E67	The Proponent must establish an independent DRP to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The DRP 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. Note: 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.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report) DRP was established 07/03/2022 Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22 Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022 Government Architects New South Wales Terms of Reference for the SM Design Review Pane; for WSA and West Line 9/03/22 SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice. FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule). GANSW Letter of advice, Feb - Jul 24	SBT does not construct any elements that trigger this condition. The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.	C
E68	The responsibilities of the Design Review Panel include: (a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI (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 (c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines. The Panel's advice must be consistent with the CSSI as approved.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report) DRP was established 07/03/2022 Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22 Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022 Government Architects New South Wales Terms of Reference for the SM Design Review Pane; for WSA and West Line 9/03/22 SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice. Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22 FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).	SBT does not construct any elements that trigger this condition. The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					GANSW Letter of advice, Feb - Jul 24		
E69	<p>The DRP 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>	Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>DRP was established 07/03/2022</p> <p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Pane; for WSA and West Line 9/03/22</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice.</p> <p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.</p>	C
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>	Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Pane; for WSA and West Line 9/03/22</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice.</p> <p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	<p>To the auditees' knowledge the DRP members remain unchanged from that initially established. SBT does not construct any elements that trigger this condition.</p> <p>The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.</p>	C
E71	<p>Prior to forming the DRP, a Design Review Panel Terms of Reference is to be developed and endorsed by the NSW Government Architect. The Terms of Reference must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and:</p> <p>(a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5);</p> <p>(b) outline the frequency of DRP meetings, coordinated with the Proponent's program requirements, as outlined in Condition E76, to ensure timely advice and design adjustment; and</p> <p>(c) identify cessation arrangements.</p>	Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Panel; for WSA and West Line 9/03/22</p>	<p>The DRP was established prior to the current audit period. The terms of reference remain unchanged.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Letter DPHI to Sydney Metro, 24/03/22 (acknowledgment of submission of DRP Terms of Reference)</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice.</p> <p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>		
E72	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference .	Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Panel; for WSA and West Line 9/03/22</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice.</p> <p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.	C
E73	The NSW Government Architect must, after consultation with the Proponent, appoint an appropriately qualified and experienced design advisor to the DRP 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	Not Applicable	Applicable	Applicable	<p>Letter DPHI to Sydney Metro, 13/01/22 (approval of extension to timeframe to establish Design Review Panel under E36) up to 23/03/22</p> <p>Record of Advice meeting on 07/03/2022 included the introductory meeting and setting up the agenda 09/03/2022</p> <p>Government Architects New South Wales Terms of Reference for the SM Design Review Panel; for WSA and West Line 9/03/22</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro) and Government Architect letters of advice.</p> <p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	The DRP was established prior to the current audit period. The terms of reference remain unchanged. Evidence of engagement on the SCAW PUDCLP and AEW FSM design and DRP Meeting Record of Advice demonstrate provision of advice. SCAW design is essentially complete. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. The letters of advice identify the Government Architect Design Advisor. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.	C
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	Not Applicable	Applicable	Applicable	<p>Government Letters of Advice, following DRP Meetings 08/09/22, 20/09/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p>	<p>Liverpool City Council has not been invited to the DRP meetings as no works relevant to the DRP occur in its LGA.</p> <p>DRP Meeting Record of Advice demonstrate provision of advice. The auditees are not aware of any material DRP activities during</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					GANSW Letter of advice, Feb - Jul 24	the current audit period. The Records of Advice identify that Penrith City Council has attended the DRP meetings.	
E75	DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final PUDCLP to the Planning Secretary for information.	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Metro, 14/12/22 (acknowledgement of submission of Design Review Panel Process).</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP was prepared and submitted to the Department for information. The PUDCLP includes all of the DRP consultation and recommendations in Appendix C. the proponent's response to the recommendations have been included. Refer to E63 regarding the status of adoption of the recommendations.</p> <p>Design of AEW FSM is ongoing. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.</p>	C
E76	The Proponent must provide the design development schedule to the DRP 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.	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SMWSA SSI10051_IA3_Request for Information_Sydney Metro_Rev1.1, 23/02/23 (Sydney Metro response to Auditor request for information)</p> <p>SMWSA DRP Programs 2022 and 2023</p> <p>Sydney Metro response to draft Audit Report, email re DRP forward program of dates, received 19/03/23</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>Sydney Metro confirmed provided the following statement: <i>'The initial design development schedule was provided to the DRP Chair on 15/02/2022, prior to the first meeting held 7/03/2022. Please see the attached email from Lara Dominish "Sydney Metro – Western Sydney Airport DRP – forward program of dates". Since this initial submission to DRP, the schedule has been progressively updated by the Sydney Metro Place Making team and presented to DRP and GANSW via the DRP meetings, hosted on Teams....'</i></p> <p>The Auditor notes that, whilst implied, E76 does not strictly state that the updated schedule must be resubmitted to the DRP.</p> <p>SCAW design is essentially complete. Refer E77.</p> <p>The FSM initial design presentation from April 2023 includes preliminary design and a schedule. The schedule has not undergone any change, despite the design changing. FSM attended the DRP on a monthly basis during the audit period. Design refinement is ongoing in response to feedback from the DRP. In June the DRP had 5 remaining comments on the FSM design and in July LORAC sought to either demonstrate that all comments were considered closed or were to be transferred to Sydney Metro to manage. The Auditor has not sighted the response from the DRP.</p>	C
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>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.</p>	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Metro, 14/12/22 (acknowledgement of submission of Design Review Panel Process).</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>Letter CPBUI to DPHI, 06/03/23 (CPBUI response to DPHI RFI re Council consultation)</p> <p>DPHI portal RFI, PA166 (Additional RFI from DPHI re Council consultation)</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP was prepared and submitted to the Department prior to permanent built surface works. The PUDCLP addresses the content requirements of this condition. The SCAW design is essentially complete. It is the responsibility of the Independent Certifier to verify that design is being implemented and compliance with E77(d). confirmation is issued to Sydney Metro progressively.</p> <p>The Department raised a request for information regarding an outstanding matter from Penrith City Council (Council was of the view that they were not provided an opportunity to review the PUDCLP). Additional consultation was carried out with Council by SCAW, and the Department provided their acceptance of this on 10/05/23.</p> <p>The FSM initial design presentation from April 2023 includes preliminary design and a schedule. The DRP provided feedback on the FSM initial design. FSM are continuing to refine design and are presenting to the DRP progressively (including the schedule of design). The FSM PUDCLP development has commenced and the</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Letter Sydney Metro to DPHI, 18/04/23 (Sydney Metro response to additional RFI re Council consultation)</p> <p>Letter DPHI to Sydney Metro, 10/05/23 (acceptance of response to additional RFI re Council consultation)</p> <p>Independent Certifier, example B14 Report (notice of substantial completion of portion)</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p> <p>FSM PUDCLP, LORAC, 05/07/24 (DRAFT) including summary of consultation.</p>	document includes evidence of consultation with Council, Transport, Metro, Heritage NSW and PLM, plus consultation with the DRP. Comments from these stakeholders are being addressed before the document is finalized. Consultation with community has yet to occur. Permanent built surface works are scheduled to commence in November 2024.	
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 Conditions E63 to E65, and</p> <p>(b) advice and recommendations from the DRP.</p>	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Metro, 14/12/22 (acknowledgement of submission of Design Review Panel Process).</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p> <p>FSM PUDCLP, LORAC, 05/07/24 (DRAFT) including summary of consultation.</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP addresses the requirements of this condition. This is set out in in Section 1.9 of the document. SCAW design is essentially complete.</p> <p>The FSM initial design presentation from April 2023 includes preliminary design and a schedule. The DRP provided feedback on the FSM initial design. FSM are continuing to refine design and are presenting to the DRP progressively (including the schedule of design).</p> <p>The FSM PUDCLP development has commenced and the document includes evidence of consultation with Council, Transport, Metro, Heritage NSW and PLM, plus consultation with the DRP. Comments from these stakeholders are being addressed before the document is finalized. Consultation with community has yet to occur. Permanent built surface works are scheduled to commence in November 2024.</p>	C
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> <ul style="list-style-type: none"> (i) justification of the spatial scope of each station precinct plan; (ii) provision for public art and heritage interpretation installations; (iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents; (iv) interchange access plans developed in consultation with the Traffic and Transport Liaison Group; (v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures; (vi) design of commuter car parking elements, where relevant; <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> <ul style="list-style-type: none"> (i) landscape plan, hard and soft elements, for the corridor and the station precincts; (ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate; (iii) water sensitive urban design initiatives 	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>Letter DPHI to Metro, 14/12/22 (acknowledgement of submission of Design Review Panel Process).</p> <p>SCAW Submission of Design Review Panel, CPBUI (issued to Metro 01/12/22, as per teambinder corro)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p> <p>FSM PUDCLP, LORAC, 05/07/24 (DRAFT) including summary of consultation.</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP addresses the requirements of this condition. This is set out in in Section 1.9 of the document.</p> <p>The FSM initial design presentation from April 2023 includes preliminary design and a schedule. The DRP provided feedback on the FSM initial design. FSM are continuing to refine design and are presenting to the DRP progressively (including the schedule of design).</p> <p>The FSM PUDCLP development has commenced and the document includes evidence of consultation with Council, Transport, Metro, Heritage NSW and PLM, plus consultation with the DRP. Comments from these stakeholders are being addressed before the document is finalized. Consultation with community has yet to occur. Permanent built surface works are scheduled to commence in November 2024.</p>	C

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	<p>(vii) 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>(viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport;</p> <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>						
E80	<p>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 Condition E79.</p> <p>The Planning Secretary must be advised prior to the transfer of the asset(s) to the relevant authority</p>	Not Applicable	Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p> <p>FSM PUDCLP, LORAC, 05/07/24 (DRAFT) including summary of consultation.</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP recognizes maintenance during construction, however operational maintenance does form part of SCAWs scope.</p> <p>AEW FSM design is ongoing. As with SCAW AEW FSM does not have any operational responsibility.</p>	NT
E81	<p>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</p>	Not Applicable	Not Applicable	Applicable	<p>Staging Report, Sydney Metro, Rev 10.0, 22/05/24</p> <p>Letter DPHI to Sydney Metro, 03/07/24 (DPHI acknowledgement of Rev 10 of Staging Report)</p> <p>SCAW PUDCLP, December 2022 (including Appendix C)</p> <p>SCAW PUDCLP portal submission record, 19/12/22</p> <p>FSM DRP Architecture Design Presentation, Aug 23 - Jul 24 (first design presentation with design schedule).</p> <p>GANSW Letter of advice, Feb - Jul 24</p>	<p>SBT does not construct any elements that trigger this condition.</p> <p>The SCAW PUDCLP recognizes maintenance during construction, however operational maintenance does form part of SCAWs scope.</p> <p>AEW FSM design is ongoing. As with SCAW AEW FSM does not have any operational responsibility.</p>	NT
Socio-Economic, Land Use and Property							
E82	<p>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.</p>	Applicable	Applicable	Applicable	<p>SBT Building Effects Report, 31/01/23 and Independent Certifier acceptance, 23/02/23</p> <p>SBT Settlement and Predicted Effects Report, 18/08/23 (and associated RFI on potential building impact on house overlying cross passage).</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>SBT CPB_WSA_Properties_Log Sheet, 19/08/24 (Post-construction condition survey tracker)</p> <p>SCAW Construction Environment Management Plan, 04/11/22 (SCAW CEMP)</p>	<p>The Project has provided evidence to show that impacts to third party property has been avoided or minimised.</p> <p>SBT has completed 146 out of 364 pre-condition surveys on potentially affected properties. 21 declined the surveys, and a further 138 did not respond. Evidence indicates that the Reports have been to the landowner prior to works that could impact on the receiver. As of August, 63 post-construction survey reports had been completed and issued.</p> <p>The SBT Building Effects Report and Settlement and Predicted Effects Report identify potential impacts associated with tunnelling and station box excavation (settlement). The Instrument and Monitoring Report identifies the monitoring required to track whether adverse impacts occur. Monitoring to date indicates that settlement is well within the nominated criteria.</p> <p>SBT team is not aware of doing any property adjustment works. Refer to E48 regarding SBT potential for cosmetic damage. Refer to E120 regarding utilities.</p> <p>The SCAW CEMP recognises this requirement through implementation of procedures and the Environmental Control Maps</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>SCAW interview, 09, 12/02/24</p> <p>Paton's Lane Road Dilapidation Report, CPBUI, 15/08/22 (and email Metro to Penrith City Council, 17/08/22)</p> <p>Luddenham Road Dilapidation Report, CPBUI</p> <p>SCAW preconstruction survey of 16-20 Lansdowne road (SBT's post construction dilapidation), 10/11/23</p> <p>SCAW Work Pack, SMF Earthworks, Rev01</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p> <p>AEW FSM preconstruction dilapidation reports, Harris Street, Roundabout, Queen Street Phillip Street, Bus terminal, TAP3 Roads (various dates) and submission to Penrith City Council.</p> <p>FSM Concession to Transport standards, 23/04/24 (approval to erect hoarding on St Marys Platforms)</p>	<p>(current SCAW works are quite remote from nearby properties). Evidence sighted (refer C1) indicates that the CEMP has been implemented to date. Dilapidation Reports have been prepared for local roads (Paton's Lane and Luddenham Road) and 16-20 Lansdowne Road. SCAW have provided evidence showing that impacts to third party property (services) is being managed in consultation with the service provider. SCAW are not aware of any damage to third party property.</p> <p>AEW FSM prepared preconstruction dilapidation reports. The works to date are not significant and potential for third party property impacts is minimal. The dilapidation reports were submitted to Council for information. FSM also obtained a permit to erect hoarding on the Transport platforms (signed off by Transport on 23/04/24).</p>	
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.	Applicable	Applicable	Applicable	<p>SBT Sydney Water design, protection and diversion documents, Phillip St, Station Street Lansdowne Road, Kent Road Sydney Water CASE198458PW, CASE190778PW, CASE198747PW, CASE190695PW</p> <p>SBT Telstra (non-contestable) comms protection, diversion and permanent design documents, Kent Road, Phillip St and Station Road</p> <p>SBT Building Effects Report, 31/01/23 and Independent Certifier acceptance, 23/02/23</p> <p>SBT Settlement and Predicted Effects Report, 18/08/23 (and associated RFI on potential building impact on house overlying cross passage).</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>Endeavour Energy letters of acceptance 02/08/22, 24/08/22, 23/09/22, 04/10/22</p> <p>SCAW CEMP, 29/07/24</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p>	<p>Evidence was provided demonstrating protection / support for services potentially affected by SBT and SCAW. These were largely completed prior to the current audit period.</p> <p>For tunnelling SBT noted that tunnelling has now been essentially completed. Consultation with potentially affected service providers, including Sydney Water and Jemena, was undertaken in order to determine appropriate utility assessment criteria. This informed the trigger levels for utilities detailed in the Instrumentation and Monitoring Report.' There have been no utility interfaces or adjustments for the current audit period.</p> <p>For SCAW works proximal to water and power networks, evidence shows consultation with the network operators. No works with the potential to impact these assets occurred during the audit period.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Pre-construction Condition Survey Report – Infrastructure (structures), CPBUI, 14/04/23</p> <p>Pre-construction Condition Survey Report – Infrastructure (utilities), CPBUI, 13/02/23</p> <p>Complaints register current to 16/08/24</p> <p>Transport Access Program 3 Footbridge St Marys MCC, Utilities Management Plan, 20/03/23</p> <p>FSM to Council presentation, 09/02/24 (workshop with Council on flooding, drainage)</p>	<p>AEW FSM have not yet progressed to protection or diversion of utilities, only investigations thus far. AEW FSM has a Utilities Management Plan in place for when utility diversion etc. are required. FSM will be upgrading the stormwater network proximal to the FSM works. A workshop with Council was held in February 24. The works are yet to commence.</p>	
E84	<p>A suitably qualified and experienced person must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in Condition A1 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 Condition Survey Report for each item surveyed. Copies of Pre-construction Condition Survey Reports 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.</p>	Applicable	Applicable	Applicable	<p>SBT Building Effects Report, 31/0/1/23 and Independent Certifier acceptance, 23/02/23</p> <p>Email SBT to Jemena, 22/03/23 including attachments (survey of Jemena gas line)</p> <p>SBT sewer CCTV / survey results (various files)</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>Paton's Lane Road Dilapidation Report, CPBUI, 15/08/22 (and email Metro to Penrith City Council, 17/08/22)</p> <p>Luddenham Road Dilapidation Report, CPBUI</p> <p>SCAW preconstruction survey of 16-20 Lansdowne road (SBT's post construction dilapidation), 10/11/23</p> <p>Pre-construction Condition Survey Report – Infrastructure (structures), CPBUI, 14/04/23</p> <p>Pre-construction Condition Survey Report – Infrastructure (utilities), CPBUI, 13/02/23</p> <p>Pre-construction survey report, 16-20 Lansdowne Road, Land Surveys, 10/11/23 (SBT's post-construction acts as SCAWs pre-construction).</p> <p>AEW FSM preconstruction dilapidation reports, Harris Street, Roundabout, Queen Street Phillip Street, Bus terminal, TAP3 Roads (various dates) and submission to Penrith City Council 25/05/23</p>	<p>SBT has completed 146 out of 364 surveys on potentially affected properties. 21 declined the surveys, and a further 138 did not respond. Evidence indicates that the Reports have been to the landowner prior to works that could impact on the receiver.</p> <p>SCAW has potentially impacted local roads, structures and utilities, and 16-20 Lansdowne Road. The relevant preconstruction condition reports were completed and submitted to the relevant stakeholder.</p> <p>Pre-construction dilapidation reports were prepared for each AEW package well prior to the current audit period, and issued to the relevant stakeholders.</p> <p>Refer to the first and second audit reports for the dilapidation reports (and correspondence to stakeholders) associated with site establishment works.</p> <p>Note: The auditees and reports indicated that the persons preparing the dilapidation report were suitably qualified and experienced and this is referenced in some of the reports. That being said, Auditor cannot confirm whether the authors' are truly suitably qualified and experienced.</p>	C
E85	<p>Condition surveys of all items for which condition surveys were undertaken in accordance with Condition E84 must be undertaken by a suitably qualified and experienced person after completion of the work identified in Condition E84. The results of the surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports 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.</p>	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>AEW TBI Post Construction Dilapidation Report, Ward Civil 09/05/22</p> <p>Email TfT to Sydney Metro 23/02/23</p> <p>Email Quickway to Sydney Metro, 10/02/23</p> <p>Post-Construction Land Condition Assessment Report, Alliance Geotech, 01/06/22</p>	<p>AEW Water did not need to complete any pre-construction or post-construction condition surveys as the work did not impact any properties.</p> <p>SBT has completed 146 out of 364 pre-condition surveys on potentially affected properties. 21 declined the surveys, and a further 138 did not respond. Evidence indicates that the Reports have been to the landowner prior to works that could impact on the receiver. As of August, 63 post-construction survey reports had been completed and issued. Progress is reported to the IPIAP.</p>	C

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					<p>Sydney Metro response to draft Audit Report, email re DRP forward program of dates, received 19/03/23</p> <p>AEW TBI post construction dilapidation, James Townsend, 03/01/23</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>SBT CPB_WSA_Properties_Log Sheet, 19/08/24 (Post-construction condition survey tracker)</p>	SCAW and FSM have not commenced post-construction surveys. Construction works are continuing.	
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 Condition E84 unless another timeframe is agreed with the owner of the affected surface or sub-surface structure or recommended by the Independent Property Impact Assessment Panel (IPIAP) .	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SCAW interview 09/08/24</p> <p>Complaints register current to 16/08/24</p> <p>Sydney Metro interview 05-09/08/24</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p>	<p>Construction is ongoing. For SBT property damage claims are reported to the IPIAP. As of May 2024 the four active claims were as follows:</p> <p>5/3 Station Street, St Marys – closed</p> <p>45 Derwent Road, Bringelly – closed (resident declined to provide access for inspection)</p> <p>77 Kent Road, Orchard Hills – under investigation</p> <p>57 Kent Road, Orchard Hills – under investigation.</p>	C
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 Condition E84 and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the DNVIS prepared under Condition E47 , 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.	Applicable	Applicable		<p>SBT Building Effects Report, 31/01/23 and Independent Certifier acceptance, 23/02/23</p> <p>SBT Settlement and Predicted Effects Report, 18/08/23 (and associated RFI on potential building impact on house overlying cross passage).</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>Email Metro to SBT, 26/03/24 (email from Metro chair of the IPIAP confirming that they have no outstanding comments on the SBT pre- and post-construction condition surveys).</p>	<p>The SBT Building Effects Report identifies potential impacts associated with tunnelling and station box excavation (settlement). The Instrument and Monitoring Report identifies the monitoring required to track whether adverse impacts occur. Results to date indicate that settlement impacts are well within criteria.</p> <p>The DNVISs for SCAW, FSM do not identify settlement as a risk as these involve surface works. Refer E47 for DNVISs. Refer to E54 regarding vibration monitoring.</p>	C
E88	An IPIAP must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the IPIAP and must comprise geotechnical and engineering experts independent of the design and construction team. The IPIAP will be responsible for independently verifying condition surveys undertaken under Conditions E84 and E85 , the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	Applicable	Applicable	Applicable	<p>Letter DPHI to Metro, 30/06/23 (DPHI approval of IPIAP)</p> <p>SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)</p> <p>SMWSA SSI10051_IA6_SBT_RFI2_CPBG-Response (SBT response to Request for Information 2)</p> <p>IPIAP Terms of Reference, August 23</p>	<p>The IPIAP was approved on 30/06/23. According to SBT tunnelling on NSW land commenced 20/07/23.</p> <p>For SBT, property damage claims are reported to the IPIAP. SBT presented to the IPIAP in August 2024. As of August 2024, the three active claims were as follows:</p> <p>45 Derwent Road, Bringelly – closed (resident declined to provide access for inspection)</p> <p>77 Kent Road, Orchard Hills – closed</p> <p>57 Kent Road, Orchard Hills – closed.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the IPIAP 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 IPIAP. The findings and recommendations of the IPIAP are final and binding on the Proponent.	Applicable	Applicable	Applicable	Letter DPHI to Metro, 30/06/23 (DPHI approval of IPIAP) SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)) SMWSA SSI10051_IA6_SBT_RFI2_CPBG-Response (SBT response to Request for Information 2) IPIAP Terms of Reference, August 23	The IPAIP was approved on 30/06/23. Costs are borne by Sydney Metro. According to the Terms of reference, the IPIAP is charged with determining unresolved property damage disputes and its findings are final on Sydney Metro and its contractors According to SBT tunnelling on NSW land commenced 20/07/23 and monitoring is ongoing, with results sighted as being acceptable. Refer E88 with regards to resolution of property damage disputes in the absence of an adequate pre-construction survey.	NT
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of Condition E87 if directed so by the IPIAP following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with Condition E87 . The results of the monitoring must be made available to the Planning Secretary upon request.	Applicable	Applicable	Applicable	Letter DPHI to Metro, 30/06/23 (DPHI approval of IPIAP) SBT to IPIAP Presentation, 26/03/24 and 28/05/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims settlement monitoring (all within acceptable ranges up to May 2024, with results pending afterwards)) SMWSA SSI10051_IA6_SBT_RFI2_CPBG-Response (SBT response to Request for Information 2) IPIAP Terms of Reference, August 23	The IPAIP was approved on 30/06/23. Costs are borne by Sydney Metro. According to the Terms of reference, the IPIAP is charged with determining unresolved property damage disputes and its findings are final on Sydney Metro and its contractors According to SBT tunnelling on NSW land commenced 20/07/23 and monitoring is ongoing, with results sighted as being acceptable. Refer E88 with regards to resolution of property damage disputes in the absence of an adequate pre-construction survey.	NT
E91	Small Business Owners Engagement Plan(s) must be prepared for St Marys and implemented in accordance with the Overarching Community Communication Strategy 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	Applicable	Not Applicable	Applicable	SBT Small Business Owners Engagement Plan (St Marys), 16/05/22 DPHI post approval portal lodgement record, 19/08/21 (submission of Small Business Owners Engagement Program) SBT Consultation Manager download, 04/11/22 – 17/02/23 (download of consultation between SBT, Penrith Chamber of Commerce and St Marys business owners) AEW Small Business Owners Engagement Plan, July 2021 (Sydney Metro) AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan, 03/02/23	SBT provided a download of Consultation Manager showing correspondence with the Penrith Valley Chamber of Commerce and small businesses in the St Marys area. The vast majority of consultation provided was from November 2022. AEW FSM have a small business owners engagement plan as part of their community plan. There are no specific outreach requirements in the document for small businesses. The commitments are about minimising construction impacts and ensuring good communications (through Metro). Refer to B1 with respect to ongoing implementation of the Communication Strategy, which includes communications with small businesses at St Marys.	C
Soils and Contamination							
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 Condition A1, Detailed Site Investigations (for contamination) must be conducted to determine the full nature and extent of the contamination. The Detailed Site Investigation Report(s) 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 (NSW)</i> . Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.	Applicable	Applicable	Not Applicable	SBT interview 07-08/08/24 SBT Aerotropolis DSI, TTMP, 13/11/22 SBT St Marys DSI, Rev 3, 27/09/22, and Addendum 1 (to capture the Plaza, 13/10/22) and Addendum 2 (to capture groundwater, 23/11/22), and groundwater HHRA, 26/04/23 SCAW CPBUI DSI Tracker, 06/08/24, plus sample of DSIs from Douglas Partners (various dates) SCAW interview 09/08/24 Interview with FSM 13/02/24	The SBT Aerotropolis and St Marys (+ Plaza) DSIs were prepared by a CEnvP(SC). The Aerotropolis DSI recommended implementation of a RAP to make the site suitable for future use. No remediation of soils at St Marys was required. However, remediation of groundwater is recommended (to manage groundwater inflow of offsite contamination that is predicted to occur following excavation below the groundwater table. The DSIs were prepared prior to work affecting the relevant contamination. Refer to the third Independent Audit Report for details. SCAW have 15 sites that qualify for DSI and 14I have been completed (1 not required). Section B SAS have been received for 13. According to the ER, Metro and SCAW (and the audit site inspection) construction on the applicable sites has not commenced until after the DSI has been completed (refer prev audit reports). FSM includes works in AEC 1 in the footprint of the FSM compound. Works to date in this location have comprised investigations and establishment of compounds (which has not disturbed existing contamination). A consultant has been engaged to prepare a DSI and this has yet to commence. Ground disturbance is scheduled to proceed after the DSI.	C
E93	Should remediation be required to make land suitable for the final intended land use, a Remedial Action Plan must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental	Ap plic ably	Ap plic ably	Not Ap plic ably	SBT Aerotropolis RAP, 16/11/22 and 05/06/23	SBT prepared a RAP for the Aerotropolis site. The RAP was prepared by CEnvP(SC) in accordance with the guidelines. The	C

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	<p>Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Remedial Action Plan 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 Remedial Action Plan is implemented.</p> <p>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.</p>				<p>SBT Aerotropolis Site Audit Report and Site Audit Statement (Section B), JBS&G, 0503-2305</p> <p>SBT Aerotropolis Site Audit Report and Site Audit Statement (Section B), JBS&G, 15/06/23</p> <p>SBT St Marys RAP, 23/05/23</p> <p>SBT IAA on St Marys RAP, Ramboll, 07/02/23 (Auditor approval of St Marys RAP)</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SCAW CPBUI DSI Tracker, 06/08/24, plus sample of DSIs from Douglas Partners (various dates)</p> <p>SCAW RAP for AEC43, Douglas Partners, 07/12/22 and SAR and Section B SAS AEC43, Senversa, 07/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC35, Douglas Partners, March 2023 and SAR and Section B SAS AEC35, Senversa, 09/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC36, Douglas Partners, July 2023 and SAR and Section B SAS AEC36, Senversa, 28/07/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for PS105 (encapsulation area), Douglas Partners, and IAA from Senversa providing initial acceptance of the RAP, 22/12/23</p> <p>SCAW RAP 31A, Douglas Partners 07/12/23 and IAA from Senversa providing initial acceptance of the RAP, 06/02/24..</p> <p>SCAW interview 09/08/24</p>	<p>Site Auditor confirmed that the RAP is adequate. Following initial remediation, Metro directed SBT to remove the source material (in account of potential future use in the Western Sydney parklands). In response the RAP was updated for source removal. The RAP was implemented and an updated SAR and SAS was issued.</p> <p>Contaminated Sites Auditor reviewed and approved the St Marys RAP (re groundwater) on 07/02/23. Works were carried out, involving the installation of a PRB to manage groundwater movement towards the box. The Contaminated Sites Auditor provided a SAR and SAS confirming the implementation of the RAP. SBT have handed the St Marys box over to SSTOM as at October 23.</p> <p>SCAW has had five RAPs prepared to date, with another 10 sites assessed as not requiring a RAP. The RAPs address the requirements of this condition. The Site Auditor has verified that the RAPs are appropriate (either via a Section B SAS or IAA (where the SAS is pending). Remediation is continuing with contaminated material being directed to PS105 encapsulation cell, which (at this time) is to be retained on Sydney Metro land.</p> <p>The Auditor is not aware of DSIs or remediation being required for FSM during the audit period.</p>	
E94	<p>Before commencing remediation, a Section B Site Audit Statement(s) must be prepared by an NSW EPA-accredited Site Auditor that certifies that the Remedial Action Plan(s) is/are appropriate and that the site can be made suitable for the proposed use. The Remedial Action Plan(s) must be implemented and any changes to the Remedial Action Plan(s) must be approved in writing by the NSW EPA-accredited Site Auditor.</p> <p>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.</p>	Applicable	Applicable	Not Applicable	<p>SBT Aerotropolis RAP, 16/11/22 and 05/06/23</p> <p>SBT Aerotropolis Site Audit Report and Site Audit Statement (Section B), JBS&G, 0503-2305</p> <p>SBT Aerotropolis Site Audit Report and Site Audit Statement (Section B), JBS&G, 15/06/23</p> <p>SBT St Marys RAP, 23/05/23</p> <p>SBT IAA on St Marys RAP, Ramboll, 07/02/23 (Auditor approval of St Marys RAP)</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SBT Orchard Hills Section A Site Audit Report and Site Audit Statement (Section A), Ramboll, 22/12/23</p> <p>SCAW CPBUI DSI Tracker, 06/08/24, plus sample of DSIs from Douglas Partners (various dates)</p> <p>SCAW RAP for AEC43, Douglas Partners, 07/12/22 and SAR and Section B SAS AEC43, Senversa, 07/05/23 and interim validation report, Sydney Environmental 02/08/24</p>	<p>SBT prepared a RAP for the Aerotropolis site. The RAP was prepared by CEnvP(SC) in accordance with the guidelines. The Site Auditor confirmed that the RAP is adequate. Following initial remediation, Metro directed SBT to remove the source material (in account of potential future use in the Western Sydney parklands). In response the RAP was updated for source removal. The RAP was implemented and an updated SAR and SAS was issued.</p> <p>The Contaminated Sites Auditor reviewed and approved the St Marys RAP (re groundwater) on 07/02/23. Works were carried out, involving the installation of a PRB to manage groundwater movement towards the box. The Contaminated Sites Auditor provided a SAR and SAS confirming implementation of the RAP. SBT have handed the St Marys box over to SSTOM as at October 23.</p> <p>A RAP was not required for Orchard Hills, but was prepared regardless. The Auditor reviewed and endorsed the RAP. The Contaminated Sites Auditor provided a SAR and SAS confirming implementation of the RAP. SBT have handed the Stage 1 of Orchard Hills over to SSTOM in late 2023.</p> <p>SCAW has had five RAPs prepared to date by CEnvP(SC) in accordance with the guidelines, with another 10 sites assessed as not requiring a RAP. The RAPs address the requirements of this condition. The Site Auditor has verified that the RAPs are appropriate (either via a Section B SAS or IAA (where the SAS is pending). Remediation is continuing with contaminated material</p>	C

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					<p>SCAW RAP for AEC35, Douglas Partners, March 2023 and SAR and Section B SAS AEC35, Senversa, 09/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC36, Douglas Partners, July 2023 and SAR and Section B SAS AEC36, Senversa, 28/07/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for PS105 (encapsulation area), Douglas Partners, and IAA from Senversa providing initial acceptance of the RAP, 22/12/23</p> <p>SCAW RAP 31A, Douglas Partners 07/12/23 and IAA from Senversa providing initial acceptance of the RAP, 06/02/24.</p>	<p>being directed to PS105 encapsulation cell, which (at this time) is to be retained on Sydney Metro land.</p> <p>The Auditor is not aware of remediation being required for FSM.</p>	
E95	<p>Validation Report(s) must be prepared in accordance with Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA, 2020) and relevant guidelines made or approved under section 105 of the Contaminated Land Management Act 1997 (NSW).</p> <p>Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.</p>	Applicable	Applicable	Not Applicable	<p>SBT Aerotropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Station Validation Report, TTMP, 07/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SBT Orchard Hills Section A Site Audit Report and Site Audit Statement (Section A), Ramboll, 22/12/23</p> <p>SCAW CPBUI DSI Tracker, 06/08/24, plus sample of DSIs from Douglas Partners (various dates)</p> <p>SCAW RAP for AEC43, Douglas Partners, 07/12/22 and SAR and Section B SAS AEC43, Senversa, 07/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC35, Douglas Partners, March 2023 and SAR and Section B SAS AEC35, Senversa, 09/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC36, Douglas Partners, July 2023 and SAR and Section B SAS AEC36, Senversa, 28/07/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for PS105 (encapsulation area), Douglas Partners, and IAA from Senversa providing initial acceptance of the RAP, 22/12/23</p> <p>SCAW RAP 31A, Douglas Partners 07/12/23 and IAA from Senversa providing initial acceptance of the RAP, 06/02/24.</p>	<p>SBT Aerotropolis, St Marys Station and Orchard Hills remediation completed and a Validation Report, SAR and Section B SAS have been prepared and issued. SBT have handed the sites over to SSTOM for ongoing construction.</p> <p>SCAW interim validation reports are being prepared as works are completed. To note final validation reports will be prepared for each remediation site, and reviewed by the Auditor, upon completion of placement of material at PS105. will be prepared prior to the handover of the sites and following completion of validation.</p> <p>The Auditor is not aware of remediation being required for FSM.</p>	C
E96	<p>A Section A1 or Section A2 Site Audit Statement (accompanied by an Environmental Management Plan) and its accompanying Site Audit Report, 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.</p> <p>Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.</p>	Applicable	Applicable	Not Applicable	<p>SBT Aerotropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Station Validation Report, TTMP, 07/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p>	<p>Section B SAS has been obtained for St Marys. Section A SASs have been obtained for Aerotropolis and Orchard Hills. SBT have handed the Aerotropolis, Orchard Hills and St Marys sites over to SSTOM for ongoing construction. Submission of documents relating to contamination are proposed to be submitted to the identified stakeholders prior to operations.</p> <p>SCAW interim validation reports are being prepared as works are completed. To note final validation reports will be prepared for each remediation site, and reviewed by the Auditor, upon completion of placement of material at PS105. will be prepared prior to the handover of the sites and following completion of validation.</p>	NT

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					<p>SBT Orchard Hills Section A Validation Report JBS&G 18/12/23 Site Audit Report and Statement, Ramboll 22/12/23</p> <p>SCAW CPBUI DSI Tracker, 06/08/24, plus sample of DSIs from Douglas Partners (various dates)</p> <p>SCAW RAP for AEC43, Douglas Partners, 07/12/22 and SAR and Section B SAS AEC43, Senversa, 07/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC35, Douglas Partners, March 2023 and SAR and Section B SAS AEC35, Senversa, 09/05/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for AEC36, Douglas Partners, July 2023 and SAR and Section B SAS AEC36, Senversa, 28/07/23 and interim validation report, Sydney Environmental 02/08/24</p> <p>SCAW RAP for PS105 (encapsulation area), Douglas Partners, and IAA from Senversa providing initial acceptance of the RAP, 22/12/23</p> <p>SCAW RAP 31A, Douglas Partners 07/12/23 and IAA from Senversa providing initial acceptance of the RAP, 06/02/24.</p>	<p>The Auditor is not aware of remediation being required for FSM.</p> <p>Construction is ongoing.</p>	
E97	A copy of Detailed Site Investigation Report(s), Remedial Action Plan(s), Validation Report(s), Site Audit Report(s) and Site Audit Statement(s) must be submitted to the Planning Secretary and the Relevant Council(s) for information	Applicable	Applicable	Not Applicable	<p>SBT interview 07-08/08/24</p> <p>SCAW interview 09/08/24</p>	There is no timing identified for this requirement. SBT and SCAW are of the view that this information would be sent once, following receipt of the Site Audit Reports and Site Audit Statements and before operations.	NT
E98	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and must be followed should unexpected contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT SWMP, 21/09/22 (Table 11)</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste, heritage.</p> <p>Site inspection 02, 05/08/24</p> <p>SBT Environmental Visual Guides C0239 (various)</p> <p>SBT Site Environmental plans (various)</p> <p>SCAW Soil and Water Management Plan, 04/10/2023 (Appendix C5)</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSERD, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>AEW FSM Construction Environmental Management Plan, Laing O'Rourke, 15/03/24</p> <p>Laing O'Rourke, Field View (checklist and inspection module), (online)</p>	<p>SBT Unexpected Contaminated Land and Asbestos Finds Procedure is captured within Table 11 of the SBT SWMP. The Procedure has been communicated to the workforce through the relevant workpacks, site environment plans, visual guides. SBT are not aware of any circumstances of unexpected contamination finds during the audit period.</p> <p>The SCAW Unexpected Contaminated Land and Asbestos Finds Procedure is captured in Appendix C5 of the SWMP. The procedure has been communicated to the workforce. no new finds occurred during the audit period.</p> <p>The Sydney Metro unexpected finds procedure is included in the FSM CEMP. The requirements have been communicated to the workforce. According to FSM and their asbestos and contamination finds register there have been no unexpected contamination finds during the audit period.</p>	C

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					FSM Possession Packs WE38, WE44, WE 48, covers noise and vibration, heritage, waste and stockpiling and communications FSM asbestos register, 05/08/24 (identifies each asbestos find on the project)		
E99	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT SWMP, 21/09/22 (Table 11)</p> <p>SBT Work Pack Aerotropolis, Site Establishment, 261087, Rev03</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste, heritage.</p> <p>Site inspection 02, 05/08/24</p> <p>SBT Environmental Visual Guides C0239 (various)</p> <p>SBT Site Environmental plans (various)</p> <p>Sydney Metro to SBT Change Order #16, 30/11/23</p> <p>Orchard Hills SSTOM Site Validation Report, JBS&G, 12/04/24 and Site Audit Report and Section A Site Audit Statement, Ramboll, 08/05/24</p> <p>SCAW Soil and Water Management Plan, 04/10/2023 (Appendix C5)</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERS&D, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>AEW FSM Construction Environmental Management Plan, Laing O'Rourke, 15/03/24</p> <p>Laing O'Rourke, Field View (checklist and inspection module), (online)</p> <p>FSM Possession Packs WE38, WE44, WE 48, covers noise and vibration, heritage, waste and stockpiling and communications</p> <p>FSM asbestos register, 05/08/24 (identifies each asbestos find on the project)</p>	<p>SBT Unexpected Contaminated Land and Asbestos Finds Procedure is captured within Table 11 of the SBT SWMP. The Procedure has been communicated to the workforce through the relevant workpacks, site environment plans, visual guides. SBT are not aware of any circumstances of unexpected contamination finds during the audit period. SBT have not identified any unexpected finds during the audit period.</p> <p>SBT Observation from the fourth audit: Suspected asbestos containing material was identified at Orchard Hills (Lot 97) during the audit site inspection. SBT were in the process of preparing this portion of the site for handover to SSTOM. It is unclear whether the material was or was not asbestos, whether the unexpected finds procedure was enacted, nor whether this portion of the site had been subject to assessment and clearance. SBT advised that the DSI for this area is currently with the Contaminated Site Auditor to endorse. The draft DSI Report recommends that a RAP is not required due to the minor quantity of asbestos found, and that the Contaminated Site Auditor has provisionally agreed with this. When the DSI has been endorsed by the site auditor, Sydney Metro will instruct its contractor to carry out the DSI recommendation. The Auditor acknowledges the information provided by SBT but this does not preclude the need to enact the Unexpected Contaminated Land and Asbestos Finds Procedure where potential asbestos containing materials are encountered. At the time of writing the Report, the area had been cordoned off but not yet cleared. On 30/11/23 Sydney Metro directed SBT to remediate Lot 97. SBT advise that remediation has commenced and validation is expected to be completed in March 2024. A Validation Report was prepared (Orchard Hills SSTOM site Validation Report, JBS&G, 12/04/24) for the area and on 08/05/24 Ramboll issued a Site Audit Report and Section A Site Audit Statement.</p> <p>The SCAW Unexpected Contaminated Land and Asbestos Finds Procedure is captured in Appendix C5 of the SWMP. The procedure has been communicated to the workforce. no new unexpected finds during the audit period.</p> <p>The Sydney Metro unexpected finds procedure is included in the FSM CEMP. The requirements have been communicated to the workforce. According to FSM and their asbestos and contamination finds register there have been no unexpected contamination finds during the audit period.</p>	C
Sustainability							
E100	A Sustainability Plan 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).	Applicable	Applicable	Applicable	<p>Sustainability Plan, Sydney Metro, January 2022</p> <p>Letter Sydney Metro to DPHI, 21/01/22</p>	<p>The Metro WSA wide Sustainability Plan was prepared and submitted in line with this condition and accepted by the Department on 25/03/22.</p>	C

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					DPHI post approval portal lodgement record 24/01/22 Letter DPHI to Sydney Metro, 25/03/22 (acceptance of sustainability plan)		
E101	<p>The Sustainability Plan 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.</p> <p>Note: Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.</p>	Applicable	Applicable	Applicable	<p>Sustainability Plan, Sydney Metro, January 2022</p> <p>Letter Sydney Metro to DPHI, 21/01/22</p> <p>DPHI post approval portal lodgement record 24/01/22</p> <p>Letter DPHI to Sydney Metro, 25/03/22 (acceptance of sustainability plan)</p> <p>Sydney Metro SBT Sustainability compliance tracker, Feb 24</p> <p>SBT Sustainability Plan, 23/04/24</p> <p>SBT Sustainability Design Report, 28/10/22 and 29/05/23</p> <p>SBT ISC Design R2 Verification Outcome Scorecard, 27/02/24</p> <p>SBT Quarterly Sustainability Report, Q2 2024, 24/06/24</p> <p>Sustainability Initiatives and Opportunity Register, current to 07/02/24</p> <p>SCAW Sustainability Plan, 04/10/22 and updated version dated 01/02/24 (approved by Metro 16/02/24)</p> <p>SCAW ISC Design Rating Scorecard, ISC, 01/03/24</p> <p>SCAW Round 2 Submission v1.2 Tracker 05/08/24</p> <p>J508 SCAW ISC scorecard_DR2, current to 09/08/24</p> <p>SCAW As-Built_v1.2 tracker, current to 09/08/24</p> <p>SCAW Climate Change Risk Assessment Report, RPT-080301</p> <p>FSM Sustainability Contractual Requirement Tracker (no date) note that it is too early for there to be evidence of implementation.</p> <p>FSM Sustainability Management Plan, Laing O'Rourke, 05/09/23</p>	<p>The Metro WSA wide Sustainability Plan was prepared and submitted in line with this condition and accepted by the Department on 25/03/22. AEW packages were scoped out of ISC requirement, however there are elements of the overarching Sustainability Plan that must be implemented by contractors. The overarching Sustainability Plan was passed on to the contractors for localization and implementation.</p> <p>SBT Sustainability Plan has been prepared to address this condition and is consistent with the WSA wide Sustainability Plan and the target of +75 rating. The Design Report documents the compliance with sustainability requirements.</p> <p>The Sustainability Initiatives and Opportunity Register identifies sustainability elements/categories, opportunities, benefits and status. There are ~86 initiatives that have been accepted or implemented to date and ~11 that have been deemed not feasible. The Sustainability Dashboard captures sustainability metrics. The SBT Design submission achieved a score of +73, based on the absence of reporting on small innovations. Construction is ongoing. According to SBT, the package is targeting the mid-high 80s. This will be verified by ISC at the As-Built rating.</p> <p>SCAW Sustainability Plan has been prepared to address this condition and is consistent with the WSA wide Sustainability Plan and the target of +75 rating. The document was updated in early 2024. According to the SCAW round 1 ISC Design Submission, the Project is targeting 94 points (well in excess of the 75). The round 1 response identified a score of 24.4 points (which is normal for a round 1 submission). The round 2 submission is 95% complete with a target score of 86. Submission is targeted for mid-August. The As-Built rating submission is being prepared. The target score for the As-Built submission is 81.3. SCAW anticipates submission of the As-Built in late 2024/early 2025.</p> <p>response from ISC was pending at the time of the audit interviews. Initiatives Register identifies 76 initiatives, 56 are considered to have been implemented or in progress, 2 x under investigation, 12 x not implemented and 6 x not applicable.</p> <p>The Sustainability Quarterly Reports provided by each contractor assess their performance against the metrics set out in the overarching Sustainability Plan. Monthly Progress Reports from SCAW and SBT (to Metro) include key sustainability deliverables and state on how the contractors are performing. Quarterly Reports are also prepared by SBT and SCAW. These provide in depth details on how the packages are tracking against requirements.</p> <p>According to the auditees, FSM is not captured by ISC. Sustainability is managed via Transport's Sustainability Guidelines.</p>	C
E102	<p>A Water Reuse Strategy must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The Water Reuse Strategy must include, but not be limited to:</p> <p>(a) evaluation of reuse options;</p> <p>(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;</p> <p>(c) measures to avoid misuse of recycled water as potable water;</p> <p>(d) consideration of the public health risks from water recycling; and</p> <p>(e) time frame for the implementation of the preferred reuse option(s).</p>	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT Water Reuse Strategy, 29/07/24</p> <p>https://edge.sitecorecloud.io/cimicgroup1634d-cimicxmcloud-production-16eb/media/project/cimic/cpb/project-documents/sydney-metro-wsa---sbt/other-documents/water-reuse-strategy-v2.pdf</p>	<p>SBT had developed the Water Reuse strategy and it was posted on the contractor website. The Strategy addresses the requirements from this condition. Sediment basins are in place to reuse water. Due to the wet weather, water demand has been below average. It is noted that salinity of groundwater and selected treatment option means that groundwater reuse in tunnelling is not feasible in all cases and that SBT no longer intend to recover rainwater tank water. The Water Reuse Strategy was updated during the audit period to reflect this and was published on the SBT website. The updated approach, plus capturing non-potable reuse in conveyors and processing have been incorporated into a revised SBT Sustainability Plan (23/04/24) and this has been approved by</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>The Water Reuse Strategy must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction.</p> <p>Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail.</p> <p>A copy of the Water Reuse Strategy must be made publicly available.</p> <p>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</p>				<p>SCAW Water Reuse Strategy, 30/08/22</p> <p>https://cimicdigital-cdn.azureedge.net/-/media/projects/cimic/cpb/pdfs/environmental-materials/wsa_scaw/other-documents/water-reuse.pdf?la=en</p> <p>SCAW interview 09/08/24</p> <p>SCAW Monster Monthly Data tracker, current to 09/08/24</p> <p>AEW FSM Construction Environmental Management Plan, Laing Orouke, 15/03/24 (includes Water Reuse Plan)</p> <p>Letter ER to Sydney Metro, 15/03/24 (ER endorsement of minor amendment to FSM CEMP)</p>	<p>Sydney Metro. Using the revised approach the current reuse is sitting at ~59%..</p> <p>SCAW had developed the Water Reuse strategy and it was posted on the contractor website. The Strategy addresses the requirements from this condition. The main source of water will be site won (from basins, depressions and potentially local water bodies). Rainwater tanks are not being used but surface water runoff is being captured in basins for reuse. Reuse of site won water has been occurring on site (63ML since commencement, representing >65%).</p> <p>According to the approved staging report, no other active AEW packages require a Water reuse Strategy. That being said, AEW FSM Water Reuse Strategy is appended to the CEMP (and therefore subject to ER endorsement). The ER has required that the Water Reuse Strategy be updated to address the requirement of E102. An updated CEMP was endorsed by the ER on 15/03/24.</p>	
Traffic and Transport							
E103	<p>Construction Traffic Management Plans (CTMPs) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the CTMPs must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant CTMP.</p>	Applicable	Applicable	Applicable	<p>Overarching Construction Traffic Management Plan, Rev C, 24/01/22</p> <p>Letter DPHI to Sydney Metro, 18/02/22 (approval of overarching Construction Traffic Management Plan)</p> <p>SBT interview 07-08/08/24</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24, SBT CTMP St Marys TBM Demobilization 24/03/24</p> <p>Letter DPHI to Sydney Metro, 16/12/21 (acknowledgement of receipt of St Marys CTMP)</p> <p>Letter DPHI to Metro, 06/12/22 (approval of overarching SBT CTMP 16/06/22, Geotech Scope North 14/09/22, Aerotropolis 09/06/22, Bringelly 02/06/22, Claremont Meadows 15/06/22, Orchard Hills Site Estab 05/07/22, Orchard Hills Operations Sep 22)</p> <p>Letter DPHI to Metro (SSI-10051-PA-98), approval of local roads (HVLR) at St Marys, plus acknowledgement of receipt of CTMP for St Marys Demolition.</p> <p>DPHI post approval portal lodgement, 18/04/24 (submission of St Marys TBM removal CTMP)</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and</p>	<p>SBT has one overarching CTMP and eight site level CTMPs. SCAW has one overarching and six local CTMPs. FSM has one CTMP. All of the CTMPs identify the requirements from the CTMF. Once prepared each CTMP goes to Metro, TfNSW and Council for comment. Once comments are addressed it is sent for approval by TfNSW CJP. Once approved by TfNSW CJP the document is sent to the Department and published online.</p> <p>Based on the dates of the CTMPs and the correspondence from the Department, submission of each was completed prior to commencement of the relevant works. Updates were not resubmitted to the Department, but still go through reviews with CJP, Council, Metro etc.</p> <p>TGSs accompany the CTMPs. The sites were set up as per the TGSs during the audit site inspection and the ER has not identified any compliance issues with their implementation. Inspection and actions registers indicate that inspections / surveys are being conducted and deficiencies are being identified and actioned. Implementation of the SCAW and SBT CTMPs is evidenced through synergy action tracking.</p> <p>The only SBT CTMP that was updated during the audit period was the St Marys TBM removal CTMP. SCAW made one minor update to the Lansdowne Gate 1 CTMP and FSM updated the CTMP in the last audit period in response to the Department's approval of the MAF HVLR. There is another update pending (to enable an extension to use of the MAFs). All were subject to review by the TTLG.</p> <p>The Auditor notes that he does not have experience or technical knowledge in traffic.</p>	C

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					<p>Viaduct Construction 15/01/24 (no longer in use), CTMP Patons Lane (Viaduct) 09/02/24 (no longer in use)</p> <p>DPHI post approval portal lodgment, 16/09/22 (submission of SCAW Overarching CTMP)</p> <p>Letter DPHI to Sydney Metro, 19/09/22 (DPHI acknowledgment of the SCAW Overarching CTMP)</p> <p>DPHI post approval portal, 14/10/22 (submission of Elizabeth Drive CTMP) note works commenced in middle of October (after PCEMP)</p> <p>DPHI post approval portal, 19/01/23 (submission of Luddenham Road CTMP) note works commenced in February 2023</p> <p>DPHI post approval portal, 26/09/23 (submission of Paton's Lane Road CTMP) note works commenced in middle of October 2022 (after PCEMP).</p> <p>DPHI post approval portal, 28/03/23 (submission of Luddenham Road Gates 4&5 CTMP)</p> <p>DPHI post approval lodgement, 05/04/23 (notification of non-compliance on the delayed submission of Luddenham Road Gates 4&5 CTMP)</p> <p>DPHI post approval portal, 28/03/23 (submission of Lansdowne Road Gate 1 CTMP) note works at this location have yet to commence</p> <p>DPHI post approval portal, 27/04/23 (submission Badgerys Creek Road Gate 9 CTMP) note works commenced at this location in April 2023.</p> <p>DPHI post approval portal, 02/08/23 (submission of Luddenham Road Roundabout Construction CTMP) note works at this location have yet to commence.</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p> <p>AEW FSM HVLR, Laing Orouke, 07/12/23 (MAF HVLR)</p> <p>Letter DPHI to Sydney Metro, 13/12 23 (approval of AEW FSM St Marys HVLR).</p>		
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	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT Virtual Superintendent (online tracking module)</p> <p>Geofence register updated, 12/07/24</p> <p>Daily allocations from spoil haulage subcontractors to SBT (issued daily, identifying truck rego's, material types and source, and spoil disposal sites, March – July 2024).</p> <p>SCAW interview 09/08/24</p> <p>SCAW Virtual Superintendent (online tracking module)</p>	<p>Both SBT and SCAW operate an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the traffic team of speeding, braking, fatigue and departure from approved routes. Neither SBT nor SCAW are aware of any breaches of the geofencing onto local roads being used to access construction sites during the audit period. SCAW has not conducted off site spoiling during the audit period. SBT further uses a vetting system whereby the daily truck allocations are assessed as being onboarded (including that some form of telematic tracking fitted and operational). If a truck is not onboarded they are not approved to be used on site. Audits are also conducted on trucks to make sure gps's are fitted and operational. According to SBT 4200 audits have been conducted to date.</p> <p>The auditees are not aware of any requests of monitoring data from the Department or EPA during the audit period.</p> <p>Spoil haulage is not required for FSM.</p>	C

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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 Condition A1 must be approved by the Planning Secretary and be included in the CTMP.	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT HVLR Report for St Marys TBM retrieval, 16/04/24 and Letter DPHI to Metro, 17/05/24 (DPHI approval of HVLR).</p> <p>SBT CTMP St Marys TBM Demobilization 24/03/24</p> <p>SCAW interview 09/08/24</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>SCAW Virtual Superintendent (online tracking module)</p> <p>AEW FSM HVLR, Laing O'Rourke, 07/12/23 (MAF HVLR)</p> <p>Letter DPHI to Sydney Metro, 13/12 23 (approval of AEW FSM St Marys HVLR).</p> <p>FSM interview, 05/08/24</p>	<p>SBT operates an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the traffic team of speeding, braking and departure from approved routes. The SBT Traffic Manager states that instances whereby trucks leave the geofencing and entering a local road is considered a non-conformance. One Heavy Vehicle Local Road approval was obtained for St Marys TBM retrieval during the audit period. This was prepared and approved by the Department prior to commencement of the works. These roads were included in the relevant CTMP. SBT are of the view that no other local roads would be used for construction. If this is the case, this requirement can be considered closed for SBT.</p> <p>SCAW are not using any local roads that are not already identified in the EIS. All the routes are included in the CTMPs. SCAW are not aware of any instances of trucks using routes not in the CTMPs. SCAW are of the view that no other local roads would be used for construction. If this is the case, this requirement can be considered closed for SCAW.</p> <p>AEW FSM developed an HVLR for the use of local roads around St Marys for the purposes of accessing MAFs during possession works. This was described in the HVLR and was conditionally approved by DPHI on 13/12/23. The DPHI put limits as follows: Accordingly, as nominee of the Planning Secretary, I approve the following under condition E105 of SSI 10051:</p> <ol style="list-style-type: none"> 1. Use of the local roads identified in Figure 4 of HVLR Report, by heavy vehicles, for a maximum of 3 rail corridor possessions, or a maximum 6-month timeframe, from the date of this approval letter (whichever occurs first). 2. A maximum of 10 heavy vehicle movements per day, as specified in Table 2 of the HVLR Report, for the local roads identified in Figure 4 of the HVLR Report. <p>An update to the HVLR and corresponding CTMP are being prepared to enable ongoing use of the local roads and an increase in traffic volumes. These are still being prepared and have not yet been submitted to the Department for approval. FSM have not used the local roads beyond the 3 x possession / 6-month timeframe as required by the Department's earlier approval.</p>	C
E106	<p>All requests to the Planning Secretary for approval to use local roads under Condition E105 above must include the following:</p> <p>(a) a swept path analysis;</p> <p>(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;</p> <p>(c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and</p> <p>(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</p> <p>(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.</p>	Applicable	Applicable	Applicable	<p>SBT HVLR Report for St Marys TBM retrieval, 16/04/24 and Letter DPHI to Metro, 17/05/24 (DPHI approval of HVLR).</p> <p>SBT CTMP St Marys TBM Demobilization 24/03/24</p> <p>SCAW interview 09/08/24</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP</p>	<p>Refer E105. SBT Heavy Vehicle Local Road Report was prepared and was included the information from this condition was included. The Heavy Vehicle Local Road approval was obtained for St Marys prior to use of local roads in that location. All other roads were already identified in the EIS. St Marys has now been handed to SSTOM. SBT are of the view that no other local roads would be used for construction. If this is the case, this requirement can be considered closed for SBT.</p> <p>SCAW are not using any local roads that are not already identified in the EIS. All the routes are included in the CTMPs. SCAW are not aware of any instances of trucks using routes not in the CTMPs. SCAW are of the view that no other local roads would be used for</p>	C

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					<p>Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>SCAW Virtual Superintendent (online tracking module)</p> <p>AEW FSM HVLR, Laing O'Rourke, 07/12/23 (MAF HVLR)</p> <p>Letter DPHI to Sydney Metro, 13/12/23 (approval of AEW FSM St Marys HVLR).</p> <p>FSM interview, 05/08/24</p>	<p>construction. If this is the case, this requirement can be considered closed for SCAW.</p> <p>AEW FSM developed an HVLR for the use of local roads around St Marys for the purposes of accessing MAFs during possession works. This was described in the HVLR and was conditionally approved by DPHI on 13/12/23. The DPHI put limits as follows: Accordingly, as nominee of the Planning Secretary, I approve the following under condition E105 of SSI 10051:</p> <ol style="list-style-type: none"> 1. Use of the local roads identified in Figure 4 of HVLR Report, by heavy vehicles, for a maximum of 3 rail corridor possessions, or a maximum 6-month timeframe, from the date of this approval letter (whichever occurs first). 2. A maximum of 10 heavy vehicle movements per day, as specified in Table 2 of the HVLR Report, for the local roads identified in Figure 4 of the HVLR Report. <p>An update to the HVLR and corresponding CTMP are being prepared to enable ongoing use of the local roads and an increase in traffic volumes. These are still being prepared and have not yet been submitted to the Department for approval. FSM have not used the local roads beyond the 3 x possession / 6-month timeframe as required by the Department's earlier approval.</p>	
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report 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.	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT Road dilapidation Surveys 8/07/22 by Pavement Management Services provided Penrith City Council on 11/07/22 and PCC accepted it on 9/8/22</p> <p>SBT Focus Dilapidation Report, Glossip Street and Lansdowne Road, Pavement Management Services, 11/11/22, and email from Sydney Metro to SBT dated 18/01/23 confirming Penrith City Council had no comments on the documents.</p> <p>SBT WSA Dilapidation report, 08/07/22, CPBG</p> <p>AEW Preconstruction Dilapidation Report for Liverpool City Council, 20/12/21 (dilap for power supply and local roads in the Liverpool City Council)</p> <p>AEW Preconstruction Dilapidation Report for Penrith City Council, 20/12/21 (dilap for power supply and local roads in the Liverpool City Council)</p> <p>AEW Dilapidation Reports for Phillip and Lethbridge Streets, East Lane, Gidley Street, Glossop Street, Nariel Street, Queen Street, Station Street, Effective Building & Consultancy, various dates</p> <p>AEW St Marys Dilapidation Investigation Register, TfNSW, dated 05/12/2021 (and accompanying dilapidation reports)</p> <p>AEW Letter TfNSW to Council, 28/09/21 and 04/02/22 (submission of road design and confirmation of road authority designation)</p> <p>Road Condition Report, ARRB, 01/12/22 (SCAW wide)</p>	<p>A number of dilapidation reports for roads around St Marys were completed by AEW prior to SBT. Refer to audit reports 1 and 2 for dilapidation reports for AEW works conducted during earlier audit periods.</p> <p>Road Dilapidation Reports for SBT (where not already completed by AEW) were prepared for the local road to be used and were provided to the Council. These reports were all encompassing of the surrounding area. No new dilapidation reports were prepared during the audit period. SBT are of the view that no other local roads would be used for construction. If this is the case, this requirement can be considered closed for SBT.</p> <p>SCAW Road Dilapidation Reports for local roads (one of) was prepared and submitted to Council in August 2022, which was prior to construction for the local roads to be used. SCAW are of the view that no other local roads would be used for construction. If this is the case, this requirement can be considered closed for SCAW.</p> <p>AEW Water, AEW FSM and AEW SPO prepared dilapidation reports and submitted these to the relevant parties.</p>	C

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					<p>Paton's Lane Road Dilapidation Report, CPBUI, 15/08/22 (and email Metro to Penrith City Council, 17/08/22)</p> <p>AEW FSM preconstruction dilapidation reports, Harris Street, Roundabout, Queen Street Phillip Street, Bus terminal, TAP3 Roads (various dates) and submission to Penrith City Council.</p>		
E108	<p>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):</p> <p>(a) compensate the Relevant Road Authority for the damage so caused; or</p> <p>(b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the Road Dilapidation Report.</p>	Applicable	Applicable	Applicable	<p>Penrith City Council Metro WSA Delivery Meeting Minutes, 15/04/24 and 23/07/24 (includes evidence of satisfaction with Kent Road and Phillip Street repairs)</p> <p>Teambinder corro SBT to Metro 12/02/24 (submission of post construction dilapidation reports to Metro for St Marys, Orchard Hills Stage 1, Bringelly and Aerotropolis)</p> <p>SCAW Luddenham Road Repair works tracker, 2024</p> <p>SMWSA and PCC Meeting Minutes, 18/09/23 and 24/11/23</p> <p>SCAW Luddenham Road Condition Report Combined, July 2024.</p> <p>DelSIG Sub-Group Meeting, 22/05/24 (allocation of repairs of Luddenham Road and Kent Road repairs to each Metro contractor).</p> <p>Luddenham Road Repair tracker July 2024</p>	<p>The Auditor notes the road dilapidation reports identified in E107 which has assessed the condition of local roads being used by Heavy Vehicles. Any pre-existing damage has been recorded.</p> <p>SBT identified and completed repairs to a pothole on Kent Street Orchard Hills and Phillip Street St Marys. These works were completed in April 2024 and July 2024 and Council confirmed that they did not have any outstanding concerns in the Council Delivery Meeting Minutes. .</p> <p>SBT post construction road dilapidation process has commenced for portions of the site handed over to SSTOM / Sydney Metro. Construction is ongoing.</p> <p>SCAW Observation from the fifth audit: According to the SCAW auditees, it was noted that Council had concerns over damage to Luddenham Road, and that after some time Council proceeded with rectification works. SCAW advised that it maintains a Luddenham Road Condition and Repair Register, detailing road degradation and works in the area / upcoming repair works. This information is communicated with Sydney Metro who manage the correspondence with Penrith City Council. Sydney Metro hold a fortnightly interface meeting between the Sydney Metro - Western Sydney Airport project management team and Penrith City Council. This forum allows for topic such as concerns over damage to Luddenham Road to be discussed. It was not clear at the time of completion of the fifth audit whether the damage to Luddenham Road has been caused (or exacerbated) by heavy vehicles from SCAW nor whether compensation from Sydney Metro WSA for damage to the road is warranted. *** update from the sixth audit: SCAW now completes periodic road inspection and prepares a report which goes to Metro for discussion with PCC (in the Metro PCC interface meeting). Stemming from this there has been an allocation of responsibility to road repairs (on both Luddenham and Kent to each contractor based on the primary use of the road and location of damage). Repairs have been conducted with surveys ongoing.</p>	C
E109	<p>Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to:</p> <p>(a) minimise parking on public roads;</p> <p>(b) minimise idling and queueing on state and regional roads;</p> <p>(c) not carry out marshalling of construction vehicles near sensitive land use(s);</p> <p>(d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and</p> <p>(e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.</p>	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>SBT Virtual Superintendent (online tracking module)</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24</p> <p>SBT Workpack, TBM St Marys Breakthrough & Demobilisation, 18/03/24 (includes shuttle bus service)</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates</p>	<p>SBT and SCAW operates an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the controller of speeding, marshalling, braking, fatigue and departure from approved routes.</p> <p>The CTMPs identify parking and internal traffic movements to prevent parking and idling, marshalling external to the site.</p> <p>Of note, SBT operated a shuttle bus services from St Marys to other sites during the St Marys TBM removal (and running of prestarts at other sites) to avoid people parking at St Marys during TBM retrieval.</p> <p>The complaints do not indicate contravention of the Project CTMPs.</p> <p>No complaints have been received for SCAW or FSM.</p>	C

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					<p>4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p> <p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p>		
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p> <p>SBT Virtual Superintendent (online tracking module)</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24</p> <p>SBT Sydney Water design, protection and diversion documents, Phillip St, Station Street Lansdowne Road, Kent Road Sydney Water CASE198458PW, CASE190778PW, CASE198747PW, CASE190695PW</p> <p>SBT Telstra (non-contestable) comms protection, diversion and permanent design documents, Kent Road, Phillip St and Station Road.</p> <p>SBT Lansdowne Road bridgework TGS, within Orchard Hills Operations CTMP.</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p>	<p>SBT and SCAW operate an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the controller of speeding, marshalling, braking, fatigue and departure from approved routes.</p> <p>The CTMPs identify parking and internal traffic movements to prevent parking and idling, marshalling external to the site and recognise that access must be maintained.</p> <p>Agreement has been obtained from Water NSW when SCAW are working in their corridor. No issues have been observed on site, noting the sites are relatively isolated from other properties and utilities.</p> <p>Evidence was provided demonstrating protection / support for services potentially affected by SBT and SCAW. Refer E82.</p> <p>The auditees are not aware of any disruptions during the audit period.</p>	C
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.	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p>	<p>SBT and SCAW operate an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the controller of</p>	C

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					<p>SBT interview 07-08/08/24</p> <p>SBT Virtual Superintendent (online tracking module)</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24</p> <p>SBT Sydney Water design, protection and diversion documents, Phillip St, Station Street Lansdowne Road, Kent Road Sydney Water CASE198458PW, CASE190778PW, CASE198747PW, CASE190695PW</p> <p>SBT Telstra (non-contestable) comms protection, diversion and permanent design documents, Kent Road, Phillip St and Station Road.</p> <p>SBT Lansdowne Road bridgework TGS, within Orchard Hills Operations CTMP.</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p>	<p>speeding, marshalling, braking, fatigue and departure from approved routes.</p> <p>The CTMPs identify parking and internal traffic movements to prevent parking and idling, marshalling external to the site and recognise that access must be maintained.</p> <p>Agreement has been obtained from Water NSW when SCAW are working in their corridor. No issues have been observed on site, noting the sites are relatively isolated from other properties and utilities.</p> <p>Evidence was provided demonstrating protection / support for services potentially affected by SBT and SCAW. Refer E82.</p>	
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.	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p> <p>SBT Virtual Superintendent (online tracking module)</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24</p> <p>SBT Sydney Water design, protection and diversion documents, Phillip St, Station Street Lansdowne Road, Kent Road Sydney Water CASE198458PW, CASE190778PW, CASE198747PW, CASE190695PW</p>	<p>SBT and SCAW operate an online tool with real-time GPS tracking of all spoil trucks. The system uses geofencing to identify if a truck has left the approved routes. The system alerts the controller of speeding, marshalling, braking, fatigue and departure from approved routes.</p> <p>The CTMPs identify parking and internal traffic movements to prevent parking and idling, marshalling external to the site and recognise that access must be maintained.</p> <p>The auditees are not aware of any activities regarding restriction of third party access.</p>	NT

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					<p>SBT Telstra (non-contestable) comms protection, diversion and permanent design documents, Kent Road, Phillip St and Station Road.</p> <p>SBT Lansdowne Road bridgework TGS, within Orchard Hills Operations CTMP.</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p>		
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.	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p>	<p>SBT, SCAW, FSM are not aware of instances whereby property has been physically affected during the audit.</p> <p>The ER has not identified any compliance issue associated with this requirement.</p> <p>Refer to E108 regarding Luddenham Road.</p>	C
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.	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>Complaints register current to 16/08/24</p> <p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24</p> <p>SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p>	<p>With the exception of St Marys, SBT sites are relatively isolated from pedestrian, cyclist and vehicular access and parking. SBT is not aware of any works requiring obstruction to access. No obstructions were observed during the inspection.</p> <p>SCAW sites during the audit period are very isolated from pedestrian, cyclist and vehicular access and parking. CTMPs recognise that access must be maintained. Pedestrian, cyclist, vehicular access interfaces of risk. No complaints received regarding this requirement on SCAW during the audit period.</p> <p>FSM are not activities / sites that restrict access.</p> <p>The ER has not identified any non-compliances with this requirement.</p>	C
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.	Applicable	Not Applicable	Applicable	<p>SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) SBT CTMP St Marys Site Estab May 22 (revised Jan 23), SBT CTMP St Marys Demolition 27/06/22</p> <p>AEW FSM CTMP, Laing Orouke, 06/11/23 (prev version was submitted to DPHI).</p> <p>ER Monthly Reports for February – July 24</p>	No issues observed. No non-compliances with this requirement identified by the auditees or ER during the audit period. No complaints received regarding access during the audit period.	C

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					Complaints register current to 16/08/24		
E116	A Traffic and Transport Liaison Group(s) must be established in accordance with the Construction Traffic Management Framework to inform the development of CTMP.	Applicable	Applicable	Applicable	TTLG Terms of Reference SM-WSA-04/02/2022 Sydney Metro WSA TTLG meeting minutes May - Aug 24	The WSA TTLG has been established and meets monthly. It runs through any works that may impact on traffic and road safety. The group is made up of each contractor, Road Authority, Metro, emergency services, transport operators. Each contractor presents updates to CTMPs and works. According to the auditees there have not been any material disagreements over traffic management during the audit period. The next main matter of interest to participants is the TBM removal at St Marys, which will require the taking of parking on Queen Street and temporary occupation of the bus bays. These works have yet to commence.	C
E117	Supplementary analysis and modelling as required by TfNSW and / or the Traffic and Transport Liaison Group(s) 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 CTMP. Permanent road works included in the CSSI must be designed, constructed and operated with the objective of integrating with existing and proposed road and related transport networks and minimising adverse changes to the safety, efficiency and accessibility of the network. Design and assessment of related traffic, parking, pedestrian and cycle accessibility impacts and changes shall be undertaken: (a) in consultation with, and to the reasonable requirements of the relevant Traffic and Transport Liaison Group; (b) in consideration of existing and future demand, connectivity (in relation to permanent changes), performance and safety requirements; (c) to minimise and manage local area traffic impacts; (d) to, where possible and appropriate, retain or reinstate parking in St Marys; (e) to ensure access is maintained to property and infrastructure (f) to address relevant design, engineering and safety guidelines, including Austroads, Australian Standards and TfNSW requirements. Copies of civil, structural and traffic signal design plans shall be submitted to the Relevant Road Authority for consultation during design development and before completion of construction of the CSSI.	Applicable	Applicable	Applicable	TTLG Terms of Reference SM-WSA-04/02/2022 Sydney Metro WSA TTLG meeting minutes May - Aug 24 SBT Overarching Construction Traffic Management Plan, 16/06/22 (CTMP) and SBT CTMP Aerotropolis 09/06/22, SBT CTMP Bringelly 02/06/22, SBT CTMP Claremont Meadows 15/06/22, SBT CTMP St Marys Site Estab (revised August 23), SBT CTMP Geotech Scope North 05/04/23, SBT CTMP Orchard Hills Site Estab 27/06/22, SBT CTMP St Marys Demolition 27/06/22, SBT CTMP Orchard Hills Operations Sep 22, SBT CTMP St Marys TBM Retrieval Mar 24 SCAW Overarching Construction Traffic Management Plan 29/09/22 (CTMP), SCAW CTMP Paton's Lane 28/09/22, SCAW CTMP Elizabeth Drive 17/10/22, SCAW CTMP Luddenham Road Gate 3 28/09/23, CTMP Lansdowne Road Gate 1 14/05/24, CTMP Luddenham Road Gates 4&5 04/05/23, CTMP Badgerys Creek Road Gate 9 18/04/23, CTMP Luddenham Road Roundabout and Viaduct Construction 15/01/24, CTMP Patons Lane (Viaduct) 09/02/24 AEW FSM CTMP, Laing O'Rourke, 06/11/23 (prev version was submitted to DPHI).	Supplementary analysis and modelling has been completed and incorporated into the CTMPs, or has not been deemed as being required by TfNSW / TTLG. The CTMPs identify how traffic can be managed in accordance with this requirement. The CTMPs go to Metro, TTLG, TfNSW and Council for comment. Once comments are addressed it is sent for approval by TfNSW CJP. Once approved by TfNSW CJP the document is sent to the Department. SBT, SCAW and FSM are not delivering any permanent road works.	C
E118	As part of Condition E117 the Traffic and Transport Liaison Group(s) is to identify opportunities to improve the intersection performance during operation at: (a) Queen Street/Great Western Highway/Mamre Road in St Marys; (b) Glossop Street/ Forrester Road in St Marys; and (c) Glossop Street / Great Western highway in St Marys. Identified improvements must be implemented prior to the commencement of operation.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 TTLG Terms of Reference SM-WSA-04/02/2022 Sydney Metro WSA TTLG meeting minutes May - Aug 24	SBT, SCAW, FSM are not delivering any permanent road works.	NT
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 Traffic and Transport Liaison Group before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	Applicable	Applicable	Applicable	Staging Report, Sydney Metro, Rev 10.0, 22/05/24 TTLG Terms of Reference SM-WSA-04/02/2022 Sydney Metro WSA TTLG meeting minutes May - Aug 24	SBT, SCAW, FSM are not delivering any permanent road works.	NT
Utilities Management							
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.	Applicable	Not Applicable	Applicable	SBT Settlement and Predicted Impacts Report, 16/06/23 SBT Utilities Design Report (various) SBT Sydney Water design, protection and diversion documents, Phillip St, Station Street Lansdowne Road, Kent Road Sydney Water CASE198458PW, CASE190778PW, CASE198747PW, CASE190695PW	SBT Settlement and Predicted Impacts Report assesses the predicted impacts on properties, utilities and services as a result of settlement. The Report identifies a range of properties and services along the alignment, but for all that have been assessed so far, the influence is not expected to adversely influence the service. The Utility Design Reports identify all utilities likely to be impacted during the works and the level / type of treatment required. Evidence shows that SBT has identified utilities that are potentially	C

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					<p>SBT Telstra (non-contestable) comms protection, diversion and permanent design documents, Kent Road, Phillip St and Station Road</p> <p>SBT Building Effects Report, 31/01/23 and Independent Certifier acceptance, 23/02/23</p> <p>SBT Settlement and Predicted Effects Report, 18/08/23 (and associated RFI on potential building impact on house overlying cross passage).</p> <p>WSA SBT Instrumentation and Monitoring Monthly Status Reports, 22 March 23 – 22 June 24 (vibration monitoring at the Goods Shed)</p> <p>Geosense WSA-SBT (online GIS based monitoring module)</p> <p>SBT to IPIAP Presentation, 30/01/24 (update to IPIAP on project progress, pre- and pos-construction surveys, damage claims (1 x under investigation), settlement monitoring (all within acceptable ranges)</p> <p>IPIAP Memos to SBT, and SBT responses, July 23 – February 24.</p> <p>Endeavour Energy letters of acceptance 02/08/22, 24/08/22, 23/09/22, 04/10/22</p> <p>SCAW CEMP, 29/07/24</p> <p>SCAW Work Pack, SMF Earthworks, Rev01</p> <p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Email TransGrid to SCAW, 12/12/22 (consultation on works near towers 632 and 633)</p> <p>Pre-construction Condition Survey Report – Infrastructure (structures), CPBUI, 14/04/23</p> <p>Pre-construction Condition Survey Report – Infrastructure (utilities), CPBUI, 13/02/23</p> <p>Transport Access Program 3 Footbridge St Marys MCC, Utilities Management Plan, 20/03/23</p> <p>AEW Water utility location/investigation report (no date)</p> <p>Complaints register current to 16/08/24</p>	<p>impacted and that utilities are being consulted with on impacts and necessary actions to manage impacts.</p> <p>The SCAW CEMP and Work Packs include guidance on the identification and management of services. This includes the requirement to complete DBYD investigations and (if anything identified) contact with service provider. To date SCAW has shown consultation with Water NSW and TransGrid. They are not aware of other services potentially affected during the audit period.</p> <p>The auditees are not aware of any disruptions during the audit period.</p>	
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.	Not Applicable	Applicable	Applicable	<p>Email Water NSW and SCAW, 28/11/22</p> <p>Water NSW Early Works Access Licence, 19/09/22 (access to Water NSW corridor)</p> <p>Water NSW Construction Licence, 03/10/23 (Pier 7 construction) and accompanying SCAW Work Pack Peir 7 construction, Rev 4.</p> <p>Water NSW Interface Agreement 18/07/24 (agreement for construction of all remaining works associated with the viaduct).</p>	<p>SBT and FSM do not interact with the Warragamba to Prospect Water Supply Pipeline.</p> <p>SCAW obtained three licences from WaterNSW to work in the pipeline corridor. These licences have been granted off the back of consultation with WaterNSW on the construction methods and controls. Works are well advanced with the viaduct being installed at the time of the audit inspection.</p>	C

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Waste							
E122	<p>Waste generated during construction and operation must be dealt with in accordance with the following priorities:</p> <p>(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;</p> <p>(b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and</p> <p>(c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.</p>	Applicable	Applicable	Applicable	<p>SBT Waste CEMP Sub-plan, 15/03/24</p> <p>SBT Project induction (no date) including information on sustainability, hold points, legal requirements, soil and water, contamination and spills, noise and vibration, flora and fauna, visual amenity, air quality, waste</p> <p>SBT interview 07-08/08/24</p> <p>SBT Material Importation Tracker and Aerropolis tracker, current to August 2023</p> <p>SBT Material Importation Form and accompanying Material Classification Report, 07/10/22</p> <p>SBT Waste Disposal Site Approval Guidance, 08/09/22</p> <p>The Western Sydney Airport Tunnel Spoil RRO / RRE, 2023</p> <p>SBT Approved Waste Disposal Site Register, 22/02/24</p> <p>SBT Spoil Tracker Orchard Hills, 06/08/24</p> <p>SBT Spoil Tracker, Bringelly, 31/07/24</p> <p>SBT CMF Tracker, 31/07/24</p> <p>S143 statements, Light Horse Interchange 09/03/22, Cornwallis Road 01/06/23, JKW development, 13/12/22, Kemps Creek Warehouse 26/09/22, Nepean Business Park 4/11/21, Gipps Street 16/01/23, Brandown 23/07/24, Penrith Lakes 23/05/24 & 18/06/24 and associated consents and letters as relevant.</p> <p>SBT Aerropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SBT Orchard Hills Section A Validation Report JBS&G 18/12/23 Site Audit Report and Statement, Ramboll 22/12/23</p> <p>Brandster Liquid waste tracker current to 09/08/24, and associated dockets and EPLs 5973 and 6414</p> <p>SBT Bingo Waste Report Mar – Aug 24, plus list of tip sites</p> <p>Claremont Meadows Waste Classification Report, Neo, 12/07/24</p> <p>SCAW Waste Management Plan 19/06/24</p> <p>SCAW Project induction, Rev29 (covers air quality, contamination, biodiversity, heritage, unexpected finds (heritage and contam), spoil import, ERSED, noise and vibration, waste chemicals, spills, incidents and permits)</p> <p>The M6 Stage 1 (hard ground) tunnel spoil exemption February 2022</p>	<p>The SBT Waste CEMP Sub-plan identifies waste avoidance, reduction, reuse/recycle options and disposal requirements. The SBT Sustainability Dashboard identifies waste and resource consumption and reuse/recycling. The SBT Waste Disposal Register identifies resource recovery facilities / service providers for recycling and / or disposal. The Waste Disposal Site Approval Guidance establishes a process for securing waste disposal sites (including development sites for reuse of soil). Refer E124 and E125 for offsite disposal/reuse on development sites.</p> <p>The SCAW Waste Management Plan identifies waste avoidance, reduction, reuse/recycle options and disposal requirements. Waste management approaches have been communicated to the workforce. Works conducted during the audit period have involved earthworks whereby material suitable for reuse has been reused on site (cut to fill) and the site is actually consuming material for construction. Waste segregation and recycling facilities were sighted during the inspection.</p> <p>The environmental inspections include checks on waste segregation, stabilized, bin use etc.</p> <p>ACM disposed of has been tracked.</p> <p>Building and demolition waste is being managed by Aussie Skips. Monthly report shows where the waste has gone for recycling / recover / disposal. Approximately 80% of waste has been recycled to date.</p> <p>Waste generation for FSM has been negligible to date, with material either not yet removed from site, recycled or reused on site. Refer E124.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>The M6 Stage 1 (hard ground) tunnel spoil order February 2022</p> <p>Spoil Reival Letter and Section 143 Certificate 31/08/22 (for acceptance of M6 tunnel soil)</p> <p>Eastern Tunneling Package (ETP) RRO and RRE, , Letter SCAW to Eastern Tunneling Package (spoil acceptance letter and S143) 08/09/23</p> <p>Central Tunnelling Package (CTP) RRO and RRE, Letter SCAW to Central Tunneling Package (spoil acceptance letter and S143) 04/10/23</p> <p>Western Harbour Tunnel RRO and RRE, Letter SCAW to Western Harbour Tunnel (spoil acceptance letter and S143) 18/12/23</p> <p>Letter Concrete Recyclers to SCAW, 12/10/23, Boral to SCAW, 10/10/23 (confirmation of supply of recovered aggregate under the Recovered Aggregate RRO/RRE)</p> <p>SCAW Monster Monthly Data tracker, current to 09/08/24</p> <p>SCAW Sandstone Import Tracker current to 18/08/24</p> <p>SCAW Office Waste Tracking Register, current to 31/07/24</p> <p>SCAW Waste disposal facility environment protection licences: EPL 12168, EPL 1342, EPL 114976, EPL 20855, EPL 21389, EPL 21577, EPL 21421</p> <p>SCAW Austip Recycling Monthly Reports, Mar – Jun 24 and EPL 21421 (Riverstone storage and recovery centre), plus of final recovery / disposal sites.</p> <p>SCAW Waste Classification Report, gate 9, Sydney Environmental, 26/06/24 (ACM waste classification) and ACM tip dockets 28/06/24 - 02/07/24</p> <p>SCAW Waste Classification Report, AEC31a, Sydney Environmental, 06/06/24 (ACM and RSW); EPA consignment authorization 18 and 19/07/24 and associated dockets (Cleanaway 18 and 19/07/24); ACM tip dockets 18 and 19/07/24.</p> <p>FSM Sustainability Performance Tracker, current to 31/05/24</p> <p>Waste Classification Reports ADE Consulting, 57 Hobart Street, 11/04/24, TAP Footbridge 23/05/24, Harris Street portion of Lots 1 and 2 05/08/24, 32 Harris Stret 29/04/24, 57 Hobar Street 11/04/24</p> <p>FSM Waste Classification Reports Opposite 57 Hobart Street 07/08/24, 32-34 Harris Street 10/05/24, Harris Street 23/05/24.</p> <p>FSM Waste Tracking Register current to 15/06/24 and Redhill and Galea truck dockets (various)</p> <p>FSM Grasshopper Monthly Reports, Jan – Jun 24</p> <p>FSM WE38 disposal records, Aussie Recycling, EPL 21389 and EPL 20885</p> <p>Tip dockets, 17/05/24, 24/04/24</p>		

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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 Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.	Applicable	Applicable	Applicable	<p>SBT interview 07-08/08/24</p> <p>SBT Material Importation Tracker and Aerotropolis tracker, current to August 2023</p> <p>SBT Material Importation Form and accompanying Material Classification Report, 07/10/22</p> <p>SCAW Sandstone Import Tracker current to 18/08/24</p> <p>The M6 Stage 1 (hard ground) tunnel spoil exemption February 2022</p> <p>The M6 Stage 1 (hard ground) tunnel spoil order February 2022</p> <p>Spoil Receival Letter and Section 143 Certificate 31/08/22 (for acceptance of M6 tunnel soil)</p> <p>Eastern Tunneling Package (ETP) RRO and RRE, , Letter SCAW to Eastern Tunneling Package (spoil acceptance letter and S143) 08/09/23</p> <p>Central Tunnelling Package (CTP) RRO and RRE, Letter SCAW to Central Tunneling Package (spoil acceptance letter and S143) 04/10/23</p> <p>Western Harbour Tunnel RRO and RRE, Letter SCAW to Western Harbour Tunnel (spoil acceptance letter and S143) 09/07/24</p> <p>S143 certificate, 24/07/24 and material import acceptance letter 24/07/24 (SCAW acceptance of VENM from 311 South Street Marsden park)</p> <p>Letter Concrete Recyclers to SCAW, 12/10/23, Boral to SCAW, 10/10/23 (confirmation of supply of recovered aggregate under the Recovered Aggregate RRO/RRE)</p>	<p>SBT material import is managed through a material importation form. The form identifies under what mechanism the material can be imported (i.e.: EPL, RRO, POEO Waste Reg). The form is accompanied by a material classification report where applicable. No material has been imported to SBT during the current audit period.</p> <p>SCAW is importing fill for construction of the whole alignment. Evidence shows that the material was VENM or was covered under the EPL and Resource Recovery Exemption.</p> <p>AEW FSM have not imported any waste to date (only quarried bedding sand).</p> <p>Note: The Auditor has reviewed the material import register/s and material classification records prepared by others and presented by the auditee/client. The Auditor has not conducted any testing, analysis or visual inspection of the material to independently verify its classification, nor does the Auditor guarantee that the imported material is that same volume, classification or type as that described in the sighted material classification records</p>	C
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 Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Applicable	Applicable	Applicable	<p>SBT Waste Disposal Site Approval Guidance, 08/09/22</p> <p>The Western Sydney Airport Tunnel Spoil RRO / RRE, 2023</p> <p>SBT Approved Waste Disposal Site Register, 22/02/24</p> <p>SBT Spoil Tracker Orchard Hills, 06/08/24</p> <p>SBT Spoil Tracker, Bringelly, 31/07/24</p> <p>SBT CMF Tracker, 31/07/24</p> <p>S143 statements, Light Horse Interchange 09/03/22, Cornwallis Road 01/06/23, JKW development, 13/12/22, Kemps C reek Warehouse 26/09/22, Nepean Business Park 4/11/21, Gipps Street 16/01/23, Brandown 23/07/24, Penrith Lakes 23/05/24 & 18/06/24 and associated consents and letters as relevant.</p> <p>SBT Aerotropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p>	<p>SBT Waste Disposal Site Approval Guidance establishes a process for securing waste disposal sites (including development sites for reuse of soil). Section 143 statements are obtained from non-licensed facilities and EPLs reviewed for licensed facilities prior to commencement of disposal of spoil at that location so as to verify that the site/s are lawfully permitted to receive the waste. The SBT Registers identifies resource recovery facilities / service providers for recycling and / or disposal. Truck movements are tracked via virtual superintendent against the daily truck allocations. Disposal records / dockets are verified by spoil team prior to payment. The Site Audit Reports for St Marys, Aerotropolis and Orchard Hills states that the material appears to have been managed in accordance with EPA requirements.</p> <p>SCAW works conducted during the audit period have involved earthworks whereby material suitable for reuse has been reused on site (cut to fill). ACM disposed of offsite during the fifth audit period was tracked either by docket or the Waste Locate tool (or both). Building and demolition waste is being managed by Austips and Aussie Skips. Monthly Report shows where the waste has gone for recycling / recover / disposal.</p> <p>AEW FSM has disposed of the GSW and Special Waste. . Excavated material has been classified and disposed of to facilities lawfully permitted to receive it.</p> <p>Note: The Auditor has conducted a high level review of the material export register/s and material classification records prepared by others and presented by the auditee/client. The Auditor has not conducted a forensic audit, any testing, analysis or visual inspection of the material to independently verify its classification, nor does the</p>	C

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					<p>SBT Orchard Hills Section A Validation Report JBS&G 18/12//23 Site Audit Report and Statement, Ramboll 22/12/23</p> <p>Brandster Liquid waste tracker current to 09/08/24, and associated dockets and EPLs 5973 and 6414</p> <p>SBT Bingo Waste Report Mar – Aug 24, plus list of tip sites</p> <p>SCAW Waste Management Plan 19/06/24</p> <p>SCAW Monster Monthly Data tracker, current to 09/08/24</p> <p>SCAW Sandstone Import Tracker current to 18/08/24</p> <p>SCAW Office Waste Tracking Register, current to 31/07/24</p> <p>SCAW Waste disposal facility environment protection licences: EPL 12168, EPL 1342, EPL 114976, EPL 20855, EPL 21389, EPL 21577, EPL 21421</p> <p>SCAW Austip Recycling Monthly Reports, Mar – Jun 24 and EPL 21421 (Riverstone storage and recovery centre), plus of final recovery / disposal sites.</p> <p>SCAW Waste Classification Report, gate 9, Sydney Environmental, 26/06/24 (ACM waste classification) and ACM tip dockets 28/06/24 - 02/07/24</p> <p>SCAW Waste Classification Report, AEC31a, Sydney Environmental, 06/06/24 (ACM and RSW); EPA consignment authorization 18 and 19/07/24 and associated dockets (Cleanaway 18 and 19/07/24); ACM tip dockets 18 and 19/07/24.</p> <p>FSM Sustainability Performance Tracker, current to 31/05/24</p> <p>Waste Classification Reports ADE Consulting, 57 Hobart Street, 11/04/24, TAP Footbridge 23/05/24, Harris Street portion of Lots 1 and 2 05/08/24, 32 Harris Stret 29/04/24, 57 Hobar Street 11/04/24</p> <p>FSM Waste Classification Reports Opposite 57 Hobart Street 07/08/24, 32-34 Harris Street 10/05/24, Harris Street 23/05/24.</p> <p>FSM Waste Tracking Register current to 15/06/24 and Redhill and Galea truck dockets (various)</p> <p>FSM Grasshopper Monthly Reports, Jan – Jun 24</p> <p>FSM WE38 disposal records, Aussie Recycling, EPL 21389 and EPL 20885</p> <p>Tip dockets, 17/05/24, 24/04/24</p> <p>EPL 13426 (Bingo Eastern Creek)</p> <p>EPL (GPP Chullora)</p> <p>Aussi Skips tip dockets (various) to EPL 20885 and BINGO Eastern Creek.</p> <p>FSM Grasshopper skip bin reports.</p>	<p>Auditor guarantee that the exported material is that same volume, classification or type as that described in the sighted material classification records</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.	Applicable	Applicable	Applicable	<p>SBT Waste Disposal Site Approval Guidance, 08/09/22</p> <p>SBT Spoil Tracker Orchard Hills, 06/08/24</p> <p>SBT Spoil Tracker, Bringelly, 31/07/24</p> <p>SBT CMF Tracker, 31/07/24</p> <p>The Western Sydney Airport Tunnel Spoil RRO / RRE, 2023</p> <p>SBT Approved Waste Disposal Site Register, 22/02/24</p> <p>S143 statements, Light Horse Interchange 09/03/22, Cornwallis Road 01/06/23, JKW development, 13/12/22, Kemps Creek Warehouse 26/09/22, Nepean Business Park 4/11/21, Gipps Street 16/01/23, Brandown 23/07/24, Penrith Lakes 23/05/24 & 18/06/24 and associated consents and letters as relevant.</p> <p>SBT Aerotropolis Validation Report, Coffey, 18/09/23, and Site Audit Report and Site Audit Statement (Section A1), JBS&G, 20/09/23</p> <p>SBT St Marys Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24 and St Marys Groundwater Site Audit Report and Site Audit Statement (Section B), Ramboll, 16/02/24</p> <p>SBT Orchard Hills Section A Validation Report JBS&G 18/12/23 Site Audit Report and Statement, Ramboll 22/12/23</p> <p>Claremont Meadows Waste Classification Report, Neo, 12/07/24</p> <p>SCAW Waste Management Plan 19/06/24</p> <p>SCAW Monster Monthly Data tracker, current to 09/08/24</p> <p>SCAW Sandstone Import Tracker current to 18/08/24</p> <p>SCAW Office Waste Tracking Register, current to 31/07/24</p> <p>SCAW Waste disposal facility environment protection licences: EPL 12168, EPL 1342, EPL 114976, EPL 20855, EPL 21389, EPL 21577, EPL 21421</p> <p>SCAW Austip Recycling Monthly Reports, Mar – Jun 24 and EPL 21421 (Riverstone storage and recovery centre), plus of final recovery / disposal sites.</p> <p>SCAW Waste Classification Report, gate 9, Sydney Environmental, 26/06/24 (ACM waste classification) and ACM tip dockets 28/06/24 - 02/07/24</p> <p>SCAW Waste Classification Report, AEC31a, Sydney Environmental, 06/06/24 (ACM and RSW); EPA consignment authorization 18 and 19/07/24 and associated dockets (Cleanaway 18 and 19/07/24); ACM tip dockets 18 and 19/07/24.</p> <p>FSM Sustainability Performance Tracker, current to 31/05/24</p> <p>Waste Classification Reports ADE Consulting, 57 Hobart Street, 11/04/24, TAP Footbridge 23/05/24, Harris Street</p>	<p>Building and demolition waste and tunnel spoil is pre-classified under the Waste Classification Guidelines. Excavated material has undergone analysis and classification in accordance with the Guidelines. The Site Audit Reports for St Marys, Aerotropolis and Orchard Hills states that the material appears to have been managed in accordance with EPA requirements.</p> <p>Note that SCAW is a net consumer of excavated material, with only small amounts of ACM and building a demolition waste being removed from site during the audit period.</p> <p>FSM has yet to really commence. Materials have been classified and stockpiled.</p> <p>Refer E124 for disposal.</p> <p>Note: The Auditor has reviewed the material export register/s and material classification records prepared by others and presented by the auditee/client. The Auditor has not conducted any testing, analysis or visual inspection of the material to independently verify its classification, nor does the Auditor guarantee that the exported material is that same volume, classification or type as that described in the sighted material classification records</p>	C

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					<p>portion of Lots 1 and 2 05/08/24, 32 Harris Stret 29/04/24, 57 Hobar Street 11/04/24</p> <p>FSM Waste Classification Reports Opposite 57 Hobart Street 07/08/24, 32-34 Harris Street 10/05/24, Harris Street 23/05/24.</p> <p>FSM Waste Tracking Register current to 15/06/24 and Redhill and Galea truck dockets (various)</p> <p>FSM Grasshopper Monthly Reports, Jan – Jun 24</p> <p>FSM WE38 disposal records, Aussie Recycling, EPL 21389 and EPL 20885</p> <p>Tip dockets, 17/05/24, 24/04/24</p> <p>EPL 13426 (Bingo Eastern Creek)</p> <p>EPL (GPP Chullora)</p> <p>Aussi Skips tip dockets (various) to EPL 20885 and BINGO Eastern Creek.</p>		
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.	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>SBT EPL 21672</p> <p>Sydney Water Tradewaste agreement, 52629, and 52722.</p> <p>SBT Water Quality Impact Assessment, 17/11/22 and addendum, 19/01/23 – Feb 24</p> <p>SBT Surface Water Monitoring Report, Nov 23 – Apr 24, June 24</p> <p>SBT EPL Monitoring report available on CPBG website https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels</p> <p>Email SBT to ER 30/11/23 (submission of second 6 monthly surface water and noise and vibration monitoring reports to the ER).</p> <p>SBT ERSED Plans for St Marys TBM retrieval (Rev01), Orchard Hills (Rev 11), Bringelly (Rev 01), Claremont Meadows (01/02/24).</p> <p>Letter EPA to SBT, 23/03/23 (Prevention notice 3504982 re dirty water run off at South Creek), Letter SBT to EPA 31/03/23 (response to prevention notice).</p> <p>Letter EPA to SBT, 27/07/23 (Show Cause 3505337 re material tracking at Gipps Street) and Letter SBT to EPA 10/08/23 (response to show cause)</p> <p>Letter EPA to SBT, 01/08/23 (Show cause 3506113 re construction water runoff at St Marys) (response pending)</p> <p>Letters DPHI to Sydney Metro, 28/06/23 and 03/07/23 (Direction under A5 regarding soil and water controls)</p> <p>Letter SEEC to SBT, 28/06/23 (independent review of SBT site controls in line with DPHI's A5 direction) and DPHI post approval portal record 07/07/23 (submission of SEEC report)</p> <p>DPHI letter Subject: Direction made under condition A5 of Sydney Metro Western Sydney Airport project (SSI-10051)</p>	<p>The SBT Design Reports include design elements for site that relate to compliance with Blue Book (with the objective of meeting water quality objectives). Refer to the third Audit Report for details.</p> <p>SBT Water Treatment Plants are operating and are regulated through an EPL. Water Quality Impact Assessment has been prepared to assist with the approval to discharge under the EPL. To date discharge has been to trade waste due to high salinity.</p> <p>The ER has identified instances whereby the works appeared to have had minor departures from the ERSED plans on site. The ER has not stated that this has resulted in any breaches of S120 or risked non-conformance with the WQOs. There has been a marked improvement to soil and water control since the third Independent Audit but ongoing opportunities for improvement remain. Refer E128.</p> <p>The SCAW Design Reports include assessment of design and modelling to demonstrate conformance with the WQOs (identified as being achieved). There are no Water Treatment Plants on SCAW during the audit period. ERSED plans have been prepared and implemented on site. The local surface water quality results indicate poor water quality in the catchment both upstream and downstream. The results do not indicate a clear pattern of behaviour or construction water impacts.</p> <p>FSM works have negligible influence / impact on waters.</p>	C

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					<p>for erosion and sediment control - Station Box and Tunnelling sites, dated 10/10/2023</p> <p>Correspondence regarding DPHI erosion and sediment control under condition A5 dated between June to October 2023.</p> <p>SCAW Design Report, drainage water quality and scour protection North to SMF, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection SMF to Cosgrove, Rev 1</p> <p>SCAW Design Report, drainage water quality and scour protection south, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection WSI, Rev 00</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>SCAW Erosion and Sediment Control Plans (ERSED Plan) Luddenham Road to Pipeline Rev 09, Elizabeth Drive Compound Rev 10, Paton's Lane to Lansdowne Rev6, Defence Rev04.</p> <p>SCAW Dewater and Discharge Permits (81- 124) (current to 30/07/24) and discharge register with all results compliant with criteria)</p> <p>FSM ERSED Plans, (ECMs), Rev 8.</p>		
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.	Applicable	Applicable	Applicable	<p>Site inspection 02, 05/08/24</p> <p>SCAW Design Report, drainage water quality and scour protection North to SMF, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection SMF to Cosgrove, Rev 1</p> <p>SCAW Design Report, drainage water quality and scour protection south, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection WSI, Rev 00</p>	<p>SBT and FSM do not work on waterfront land.</p> <p>SCAW Design Reports involving works in riparian zone show that the controlled activity guidelines have been considered.</p>	C
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).	Applicable	Applicable	Applicable	<p>ER Monthly Reports for February – July 24</p> <p>SBT EPL 21672</p> <p>Sydney Water Tradewaste agreement, 52629, and 52722.</p> <p>SBT and SSTOM Construction Water Discharge Interface Agreement, 11/07/24.</p> <p>SBT Water Quality Impact Assessment, 17/11/22 and addendum, 19/01/23 – Feb 24</p> <p>SBT Surface Water Monitoring Report, Nov 23 – Apr 24, June 24</p> <p>SBT EPL Monitoring report available on CPBG website https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels</p>	<p>ERSED Plans appear to have been implemented in accordance with this condition for all packages. Whilst the ER has identified some areas for improvement, the deficiencies are not material and appear to have been actioned.</p> <p>Controls are being installed to address surface water flows from SSTOM to SBT at Orchard Hills and M12 to SCAW. Refer to the status of previous audit findings in the body of this Audit Report.</p> <p>Observation SCAW: It was observed during the audit site inspection that a portion of sediment fence was not properly installed at the Defence site. The Auditor observes that the area of concern is not in a high risk location with respect to erosion or sedimentation.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Email SBT to ER 30/11/23 (submission of second 6 monthly surface water and noise and vibration monitoring reports to the ER).</p> <p>SBT ERSED Plans for St Marys TBM retrieval (Rev01), Orchard Hills (Rev 11), Bringelly (Rev 01), Claremont Meadows (01/02/24).</p> <p>SCAW Design Report, drainage water quality and scour protection North to SMF, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection SMF to Cosgrove, Rev 1</p> <p>SCAW Design Report, drainage water quality and scour protection south, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection WSI, Rev 00</p> <p>SCAW consolidated monitoring result register, 30/07/24</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p> <p>SCAW Erosion and Sediment Control Plans (ERSED Plan) Luddenham Road to Pipeline Rev 09, Elizabeth Drive Compound Rev 10, Paton's Lane to Lansdowne Rev6, Defence Rev04.</p> <p>SCAW Dewater and Discharge Permits (x40) (August 23 – Feb 24)</p> <p>SCAW EWMS, Dewatering and Discharge 14/11/23</p> <p>FSM ERSED Plans, (ECMs), Rev 8.</p>		
E129	<p>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:</p> <p>(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;</p> <p>(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</p> <p>(c) for bioaccumulative and persistent toxicants, the ANZG (2018) guidelines 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>	Applicable	Applicable	Applicable	<p>SBT EPL 21672</p> <p>Sydney Water Tradewaste agreement, 52629, and 52722.</p> <p>SBT Water Quality Impact Assessment, 17/11/22 and addendum, 19/01/23 – Feb 24</p> <p>SBT Surface Water Monitoring Report, Nov 23 – Apr 24, June 24</p>	<p>SBT EPL is in force and contains basin discharge monitoring and water quality requirements. SBT Water Treatment Plants have are regulated through an EPL. Water Quality Impact Assessment has been prepared to assist with the approval to discharge from WTP under the EPL. To date, water has been discharged to tradewaste only and not environment.</p> <p>SCAW and FSM do not have any construction water treatment plants on site.</p>	C
E130	<p>If construction stage stormwater discharges are proposed, a Water Pollution Impact Assessment 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.</p> <p>Note: If an EPL is required the Water Pollution Impact Assessment will be required to inform licensing consistent with section 45 of the POEO Act.</p>	Applicable	Applicable	Applicable	<p>SBT Discharge Impact Assessment, 24/03/22</p> <p>SBT EPL 21672</p> <p>SBT Water Quality Impact Assessment, 17/11/22 and addendum, 19/01/23</p> <p>SBT EPL Monitoring Reports, Feb - Jul 24 https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-station-boxes-and-tunnels</p>	<p>The SBT Discharge Impact Assessment was prepared as part of the original EPL application. The EPL was granted prior to construction. SBT EPL is in force and contains basin discharge monitoring and water quality requirements. SBT Water Treatment Plants have are regulated through an EPL. Water Quality Impact Assessment has been prepared to assist with the approval to discharge from WTP under the EPL. To date, water from the WTP has been discharged to tradewaste only and not environment. Discharges from basins are reported in the EPL Monitoring Reports.</p>	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
					<p>Construction Discharge Impact Assessment, SEEC, 13/07/22</p> <p>Email SCAW to EPA, 17/06/22</p> <p>SCAW EPL 21695</p> <p>SCAW 6-monthly construction monitoring report (Nov 23 - Apr 24) and EPL Monitoring Reports (Feb - Jul 24). https://www.cpbcon.com.au/our-projects/2022/sydney-metro-western-sydney-airport-surface-and-civil-alignment-works</p>	<p>The SCAW Discharge Impact Assessment was prepared as part of the original EPL application. The EPL was granted prior to construction, is in force and contains basin discharge monitoring and water quality requirements. Discharges from basins are reported in the EPL Monitoring Reports.</p> <p>FSM does not hold an EPL and has not prepared any Discharge Impact Assessments.</p>	
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.	Applicable	Applicable	Applicable	<p>SBT Site Establishment Design Reports Orchard Hills (031801), Aerotropolis (033701)</p> <p>SBT ERSED Plans for St Marys TBM retrieval (Rev01), Orchard Hills (Rev 11), Bringelly (Rev 01), Claremont Meadows (01/02/24).</p> <p>SCAW Design Report, drainage water quality and scour protection North to SMF, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection SMF to Cosgrove, Rev 1</p> <p>SCAW Design Report, drainage water quality and scour protection south, Rev 00</p> <p>SCAW Design Report, drainage water quality and scour protection WSI, Rev 00</p> <p>SCAW Inspection and Test Plan, drainage at Celestino, (lot closed 13/12/23)</p> <p>SCAW Erosion and Sediment Control Plans (ERSED Plan) Luddenham Road to Pipeline Rev 09, Elizabeth Drive Compound Rev 10, Paton's Lane to Lansdowne Rev6, Defence Rev04.</p> <p>FSM ERSED Plans, (ECMs), Rev 8.</p>	<p>No drainage crossings and swales have been constructed for SBT, FSM. Site ERSED plans have been prepared for temporary works where ground disturbance has occurred, in accordance with the Blue Book.</p> <p>SCAW Design Reports have been prepared to satisfy this condition. The Reports include details of the authors (drainage engineers) and application of the design guidelines and engineering standards (section 2).</p>	C
E132	<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;</p> <p>(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</p> <p>(c) for bioaccumulative 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>	Not Applicable	Not Applicable	Applicable	Site inspection 02, 05/08/24	The Project is in construction.	NT
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.	Not Applicable	Not Applicable	Applicable	<p>SBT Groundwater Monitoring Report, July – November 23, 29/01/24</p> <p>Email (teambinder) SBT to ER, 07/06/23 (submission of baseline 6 monthly groundwater monitoring report to ER)</p> <p>Letter DPPI to Sydney Metro 31/01/24 (acknowledgement of receipt of second 6 monthly groundwater monitoring report).</p>	<p>The Project is in construction. The latest groundwater monitoring report states that there has not been an unacceptable level of groundwater drawdown. Some 'red' trigger events occurred during the reporting period at Orchard Hills, Cross Passage XPS01, and Aerotropolis, but the technical advice is to continue to monitor and / or adjust trigger levels. The ER has reviewed the report and not raised any concerns with the results or recommendations. The Auditor is not aware of the Department direction on the matter.</p> <p>SCAW and FSM do not drawdown groundwater.</p>	C
E134	The Proponent must submit a revised Groundwater Modelling Report to the Planning Secretary for information before bulk excavation at the relevant construction location. The Groundwater Modelling Report must include:	Applicable	Not Applicable	Applicable	SBT Groundwater Modelling Report, 22/02/23	SBT Groundwater Modelling Report was prepared and it addresses the requirements of this condition, noting that some detailed	C

Unique ID	Compliance requirement	SBT	SCAW	SSTOM	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<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;</p> <p>(b) predicted incidental groundwater take (dewatering) including cumulative project effects;</p> <p>(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;</p> <p>(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;</p> <p>(e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and</p> <p>(f) a schematic of the conceptual hydrogeological model.</p>				<p>SMWSA SSI10051_IA3_Request for Information_Sydney Metro_Rev1.1, 23/02/23 (Sydney Metro response to Auditor request for information)</p> <p>Sydney Metro response to draft Audit Report, including Post approval portal lodgement of non-compliance with E134, Letter for E134 submission, received 19/03/23</p>	<p>requirements are presented in subordinate groundwater plans for each structure.</p> <p>This requirement does not apply to SCAW or FSM.</p>	

APPENDIX B – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS

Department of Planning, Housing and Infrastructure

Our ref: SSI-10051-PA-435

via Major Projects Portal

4 July 2024

Attention: Mr Hugh Chapman, Sydney Metro Director Environment, Sustainability and Planning

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

Dear Hugh,

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 Josephine Heltborg 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 Josephine Heltborg, Morasey Environment, as lead auditor
- Mr Richard Peterson, 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,

A handwritten signature in black ink, appearing to read "Steffen".

A/Team Leader Compliance – Government Projects
NSW Planning

As nominee of the Planning Secretary

APPENDIX C – ATTENDANCE RECORDS

Opening meeting attendance 2 and 5 August 2024

Organisation	Stage / Package	Position Title	Name
Sydney Metro	All	A/ Senior Manager Environment	Jett Blake
Sydney Metro	All	A/Environmental Coordinator	Sarah Kemp
CPBG	SBT	Approvals, Environment & Sustainability Manager	Emma Kline
CPBG	SBT	Project Services Director	Travis Butler
CPBG	SBT	Approvals Manager	Andrew Smith
Sydney Metro	All	Communications Officer	Catherine Crighton
CPBG	SBT	Environmental Coordinator	Josh Cosier
CPBUI	SCAW	Environment Manager	Michael Watts
CPBUI	SCAW	Environment Coordinator	Maddison Said
CPBUI	SCAW	Environment Coordinator	Josh Jenkins
Transport for NSW	AEW FSM	Manager Enviro and Sustainability	Glenn Spark
LORAC	AEW FSM	Environmental Manager	Charlotte Malone
LORAC	AEW FSM	Environmental Graduate	Kyi-Ella Nocack-Davies
LORAC	AEW FSM	Project Manager	Marojan Harris
LORAC	AEW FSM	Environmental Graduate	Vinnithan Vaseekaran

Closing meeting attendance 2 and 6 September 2024

Organisation	Stage / Package	Position Title	Name
Sydney Metro	All	Director – Environment, Sustainability Planning	Hugh Chapman
Sydney Metro	All	A/ Senior Manager Environment	Jett Blake
Sydney Metro	All	Manager Environment	Tim Solomon
Sydney Metro	All	A/Environmental Coordinator	Sarah Kemp
CPBG	SBT	Approvals, Environment & Sustainability Manager	Emma Kline
CPBG	SBT	Project Services Director	Travis Butler
CPBG	SBT	Approvals Manager	Andrew Smith
CPBG	SBT	Environmental Coordinator	Josh Cosier
CPBUI	SCAW	Environment Manager	Michael Watts
CPBUI	SCAW	Environment Coordinator	Maddison Said
CPBUI	SCAW	Environment Coordinator	Josh Jenkins
Transport for NSW	AEW FSM	Manager Environment and Sustainability	Glenn Spark
LORAC	AEW FSM	Environmental Manager	Charlotte Malone

APPENDIX D – CONSULTATION RECORDS

[REDACTED]

From: [REDACTED] >
Sent: Friday, 12 July 2024 12:15 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 - Department consultation

Hi [REDACTED]

Thank you for your email below.

Further to the approval (our ref. PA-435) of the independent auditors for the sixth construction phase independent audit of the Sydney Metro Western Sydney Airport project (SSI-10051), which include yourself and Mr [REDACTED] – excluding the stations, systems, trains, operations and maintenance stage delivered by the Parklife Metro consortium, please ensure the audit is conducted in accordance with Condition A36 of Infrastructure Approval SS10051, which requires the audit to be carried out in accordance with the *Independent Audit Post Approval Requirements* (May, 2020).

Please ensure that particular attention is paid during the audit to the:

- Orchard Hills tunnelling site (currently part of the station boxes and tunnelling stage delivered by CPB Ghella joint venture) and the management of soil and water, traffic, and out of hours noise, and to the interfaces between the various Orchard Hills sites
- completeness of the complaints register and the adequacy of the response to and management of complaints (per condition B4, and Independent Audit PAR, s4.2.3, bullet point 9), especially in relation to the Orchard Hills sites.

Please also consult with the NSW EPA, Penrith and Liverpool City Councils.

Kind regards,

[REDACTED]
A/Team Leader Compliance
NSW Planning | Department of Planning Housing & Infrastructure
Locked Bag 5022 | PARRAMATTA NSW 2124
www.dpie.nsw.gov.au



From: [REDACTED] <[REDACTED]>
Sent: Monday, 24 June 2024 1:41 PM
To: DPE PSVC Compliance Mailbox <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: T [REDACTED]
[REDACTED]

Subject: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 - Department consultation

Hi there.

Sydney Metro Western Sydney Airport – SSI 10051 (the Project) is required to undertake Independent Audits in accordance with SSI 10051 condition A36 and the Department’s 2020 Independent Audits Post Approval Requirements (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/35016>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The sixth audit on the Project is scheduled to commence in late early August 2024. The audit pertains to post-approval requirements and compliance covering packages SBT, SCAW and AEW. WolfPeak will not be auditing the SSTOM package (as previously communicated to Sydney Metro and the Department).

WolfPeak has yet to receive a letter of approval from the Department to undertake the sixth independent audit on the Project, and will not commence the audit until such approval is granted. Nevertheless, to provide the Department with adequate time to consider the scope of the audit, I provide this email on behalf of Sydney Metro inviting the Department:

- to identify any matters it wishes considered / focussed on in the audit, and
- for confirmation as to whether other parties or agencies are to be consulted.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Department confirm:

- if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR; or
- if it recommends that other parties or agencies are to be consulted. If so, I request that the Department identify those parties.

If the Department would like to meet to discuss any of the above, I would welcome this opportunity.

I look forward to hearing from you.

Regards,

[Redacted] | Principal
Executive Director - Infrastructure & Environmental Assurance



At WolfPeak, we live by our values and are committed to building a better future by enabling prosperity, environmental protection and positive stakeholder outcomes. In doing so, we acknowledge the Traditional Owners of Country and all Aboriginal and Torres Strait Islander people with whom we collaborate with, and respect their continuous connection to the land, waters and community. We commit to amplifying their voices in all aspects of our business and recognise their continued custodianship over the lands that have built modern Australia.

This email is intended only for the addressee and may contain confidential information. If you receive this email in error, please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment. **Consider the environment. Please don't print this e-mail unless really necessary.**

From: [REDACTED]
Sent: Thursday, December 7, 2023 11:49 AM
To: [REDACTED]
Cc: [REDACTED]; T [REDACTED]
<[REDACTED]>; [REDACTED]
<[REDACTED]>
Subject: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 5 - Department consultation

Hi there.

Sydney Metro Western Sydney Airport – SSI 10051 (the Project) is required to undertake Independent Audits in accordance with SSI 10051 condition A36 and the Department’s 2020 Independent Audits Post Approval Requirements (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/35016>
The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The fifth audit on the Project is scheduled to commence in late January / early February 2024. The audit pertains to post-approval requirements and compliance covering packages SBT, SCAW and AEW. WolfPeak will not be auditing the SSTOM package (as previously communicated to Sydney Metro and the Department).

WolfPeak has yet to receive a letter of approval from the Department to undertake the fifth independent audit on the Project, and will not commence the audit until such approval is granted. Nevertheless, to provide the Department with adequate time to consider the scope of the audit, we provide this email on behalf of Sydney Metro inviting the Department to:

- identify any matters it wishes considered / focussed on in the audit, and
- for confirmation as to whether other parties or agencies are to be consulted.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Department confirm:

- if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR; or
- if it recommends that other parties or agencies are to be consulted. If so, I request that the Department identify those parties.

If the Department would like to meet to discuss any of the above, we would welcome this opportunity.

I look forward to hearing from you.

Regards,

 | Principal
Executive Director - Infrastructure & Environmental Assurance





*At WolfPeak, we live by our values and are committed to building a better future by enabling prosperity, environmental protection and positive stakeholder outcomes. In doing so, we **acknowledge the Traditional Owners of Country and all Aboriginal and Torres Strait Islander people with whom we collaborate with, and respect their continuous connection to the land, waters and community.** We commit to amplifying their voices in all aspects of our business and recognise their continued custodianship over the lands that have built modern Australia.*

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From: [REDACTED]
Sent: Thursday, 15 August 2024 11:15 AM
To: [REDACTED]
Subject: RE: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

Hi [REDACTED]. Sorry the Department updated the link and I did not update accordingly. Please see below.

<https://www.planning.nsw.gov.au/assess-and-regulate/about-compliance/inspections-and-enforcements/independent-audit-post-approval-requirements>

Please note that the inspection and interviews have been completed, with the report drafting underway. If there is anything material of note from your end please let me know and I can re-engage the auditees if necessary.

Regards,

[REDACTED] | Principal
Executive Director - Infrastructure & Environmental Assurance



[REDACTED]
[REDACTED]
[REDACTED]

At WolfPeak, we live by our values and are committed to building a better future by enabling prosperity, environmental protection and positive stakeholder outcomes. In doing so, we acknowledge the Traditional Owners of Country and all Aboriginal and Torres Strait Islander people with whom we collaborate with, and respect their continuous connection to the land, waters and community. We commit to amplifying their voices in all aspects of our business and recognise their continued custodianship over the lands that have built modern Australia.

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From: J [REDACTED] >
Sent: Thursday, August 15, 2024 7:51 AM
To: [REDACTED]
Subject: FW: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

HI [REDACTED]

Your below email request has been forwarded to me for follow up by Kyle Browne as he's currently in a different role. Apologies for the delay in reviewing it.

I have just tried to use the IAPAR link and it doesn't appear to be working. Hoping you could please provide a new link.

Many thanks.

Kind regards

[REDACTED]

[REDACTED]
A/ Senior Operations Officer - Operations
NSW Environment Protection Authority



www.epa.nsw.gov.au @NSW EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work. As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past and present.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: [REDACTED] <[REDACTED]>
Sent: Monday, 15 July 2024 12:08 PM
To: Kyle Browne <[REDACTED]>; INFOEnvironment Mailbox <info@environment.nsw.gov.au>
Cc: [REDACTED]
[REDACTED]
[REDACTED]

Subject: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

Hi there.

I am one of the Department of Planning Housing and Infrastructure (the Department) approved independent auditors on the Sydney Metro Western Sydney Airport – SSI 10051 (the Project).

I am currently preparing to undertake the sixth independent audit on the Project. The audit is required to be conducted in accordance with SSI 10051 condition A36 and the Department's 2020 *Independent Audits Post Approval Requirements* (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/35016>
The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The on-site component of the audit is scheduled to occur in early August 2024, with the report to be submitted to the Department two months afterwards. The audit pertains to post-approval requirements and compliance on the SBT, SCAW and AEW packages for the last 6 months. SSTOM is being audited by another auditor, and does not form part of the scope of the WolfPeak audit.

In accordance with Section 3.2 of the IAPAR and the Department's instructions, I am consulting with the EPA on the scope of the audit on the SBT, SCAW and AEW packages.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request the EPA confirm if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Any questions please let me know. I look forward to hearing from you.

Regards,

 | Principal
Executive Director - Infrastructure & Environmental Assurance







At WolfPeak, we live by our values and are committed to building a better future by enabling prosperity, environmental protection and positive stakeholder outcomes. In doing so, we acknowledge the Traditional Owners of Country and all Aboriginal and Torres Strait Islander people with whom we collaborate with, and respect their continuous connection to the land, waters and community. We commit to amplifying their voices in all aspects of our business and recognise their continued custodianship over the lands that have built modern Australia.

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If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 17 July 2024 6:25 AM
To: [REDACTED]
Subject: Liverpool Council response RE: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

Good Morning [REDACTED]

Council have reviewed the scope in section 3.3 of the IAPAR and are satisfied that this is an appropriate approach to Audit No 6.

In terms of key issues Council would like examined, relating to post-approval requirements and compliance, internal SME comment has requested that the audit confirm that sufficient information has been provided to ensure that any damage caused to Derwent Road as a result of the approved works (including heavy vehicle movements) may be rectified in accordance with condition E86 of the Instrument of Approval.

Should you have any questions in relation to this correspondence, please contact me to discuss.

I hope you are keeping well.

Regards,

[REDACTED]
Principal Strategic Planner



[REDACTED]
[REDACTED] a



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

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From: [REDACTED] <[REDACTED]>
Sent: Monday, July 15, 2024 12:10 PM
To: [REDACTED] <liverpool.nsw.gov.au>; LCC <LCC@liverpool.nsw.gov.au>
Cc: [REDACTED] v. [REDACTED]
[REDACTED]
[REDACTED]
<[REDACTED]>
Subject: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

Hi there.

I am one of the Department of Planning Housing and Infrastructure (the Department) approved independent auditors on the Sydney Metro Western Sydney Airport – SSI 10051 (the Project).

I am currently preparing to undertake the sixth independent audit on the Project. The audit is required to be conducted in accordance with SSI 10051 condition A36 and the Department’s 2020 *Independent Audits Post Approval Requirements* (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/35016>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The on-site component of the audit is scheduled to occur in early August 2024, with the report to be submitted to the Department two months afterwards. The audit pertains to post-approval requirements and compliance on the SBT, SCAW and AEW packages over the last 6 months. SSTOM is being audited by another auditor, and does not form part of the scope of the WolfPeak audit.

In accordance with Section 3.2 of the IAPAR and the Department’s instructions, I am consulting with Council on the scope of the audit on the SBT, SCAW and AEW packages.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Council confirm if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Any questions please let me know. I look forward to hearing from you.

Regards,

 | Principal
Executive Director - Infrastructure & Environmental Assurance



At WolfPeak, we live by our values and are committed to building a better future by enabling prosperity, environmental protection and positive stakeholder outcomes. In doing so, we acknowledge the Traditional Owners of Country and all Aboriginal and Torres Strait Islander people with whom we collaborate with, and respect their continuous connection to the land, waters and community. We commit to amplifying their voices in all aspects of our business and recognise their continued custodianship over the lands that have built modern Australia.

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[REDACTED]

From: [REDACTED]
Sent: Thursday, 18 July 2024 8:11 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

Hi [REDACTED]

Thank you for contacting Council on this matter, and for inviting input to the upcoming audit. Unfortunately, the IAPAR link in your email below does not successfully take you to the PDF document referred to.

Nevertheless, as Council's representative on the Sydney Metro – WSA Project, I do not have any matter of concern to be examined in the upcoming audit for SBT, SCAW or AEW contract packages.

If there is anything further in relation to the Audit, please feel welcome to contact me directly.

Kind Regards

[REDACTED]
Sydney Metro Interface Lead
City Strategy

[REDACTED]
[REDACTED]
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au



Meet the seven outstanding individuals being honoured this year

From: [REDACTED] >
Sent: Monday, July 15, 2024 12:11 PM
To: [REDACTED]@penrith.city>; Penrith City Council - RECORDS <council@penrith.city>
Cc: [REDACTED]

Subject: Sydney Metro Western Sydney Airport - SSI 10051 - Independent Audit No. 6 (SBT, SCAW, AEW)

EXTERNAL EMAIL: This email was received from outside the organisation. Use caution when clicking any links or opening attachments.

Hi there.

I am one of the Department of Planning Housing and Infrastructure (the Department) approved independent auditors on the Sydney Metro Western Sydney Airport – SSI 10051 (the Project).

I am currently preparing to undertake the sixth independent audit on the Project. The audit is required to be conducted in accordance with SSI 10051 condition A36 and the Department’s 2020 *Independent Audits Post Approval Requirements* (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/35016>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The on-site component of the audit is scheduled to occur in early August 2024, with the report to be submitted to the Department two months afterwards. The audit pertains to post-approval requirements and compliance on the SBT, SCAW and AEW packages over the last 6 months. SSTOM is being audited by another auditor, and does not form part of the scope of the WolfPeak audit.

In accordance with Section 3.2 of the IAPAR and the Department’s instructions, I am consulting with Council on the scope of the audit on the SBT, SCAW and AEW packages.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Council confirm if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR.

Any questions please let me know. I look forward to hearing from you.

Regards,



Principal

Executive Director - Infrastructure & Environmental Assurance



APPENDIX E – PHOTOS




No.	Comment	Photograph
SBT St Marys		
1	Tower crane in place following TBM retrieval. The tower crane was removed the weekend following the inspection.	
2	Pit protection in place.	
3	Waste secured (left of shot) and internal haul road being periodically cleaned.	
SBT Claremont Meadows		

No.	Comment	Photograph
4	Sediment basin (rear of shot) and water treatment plant settlement tanks (right of shot) functioning correctly.	
5	Electric crawler crane in operation.	
6	Concrete washout in nominated bay.	




No.	Comment	Photograph
7	Fuel bay with bunding and spill kit.	 <p>A photograph showing a fuel bay area. A white metal cabinet is surrounded by a red and yellow plastic bunding. A yellow spill kit is visible next to the cabinet. The area is outdoors on a dirt surface.</p>
8	Bunded IBCs.	 <p>A photograph showing several large white Intermediate Bulk Containers (IBCs) stacked on yellow plastic bunding. The bunding is placed on a gravel surface next to a white trailer with 'METALLIANCE' written on it. There are wooden pallets in the foreground.</p>
9	Truck with project markings and roll-on/roll-off cover, and rumble grid.	 <p>A photograph of a blue truck with 'BAKER' branding. The side of the truck features the text 'TRANSPORT • CIVIL • EXCAVATION • CRUSHING • SCREENING • RURAL'. The truck is parked on a rumble grid.</p>
<p>SBT Orchard Hills</p>		




No.	Comment	Photograph
10	Recovered concrete, cured and prepared for removal offsite.	
11	Bunded IBCs.	
12	Sediment basin functioning as intended.	
13	Tunnel support activities are ongoing.	




No.	Comment	Photograph
14	Water bypass pipe being established between SSTOM and SBT (under an agreement). Once installed, any water leaving the SSTOM site (left of shot) will go direct to environment.	
15	Location of SSTOM and SBT surface water interface. Refer above regarding establishment of a water bypass.	
16	Sealed haul road with automatic wheel wash in operation.	


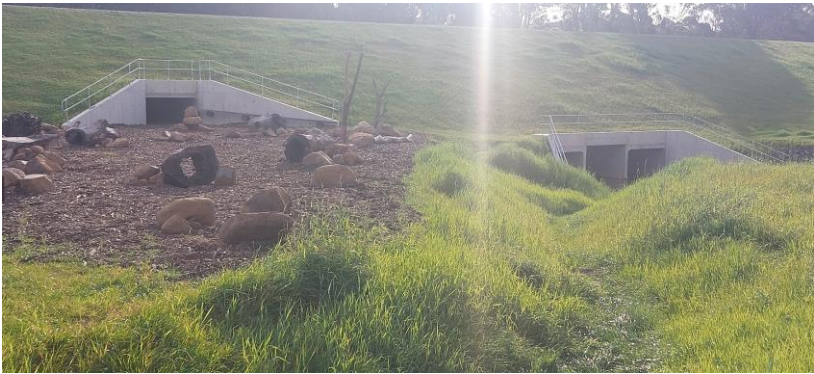

No.	Comment	Photograph
17	SBTs main gate free from material track out.	
SBT Aerotropolis		
18	Tunnel support activities ongoing.	
19	Concrete tray in use.	

No.	Comment	Photograph
20	Base slab FRP works ongoing.	
SBT Bringelly		
21	Material segregation and handling was well organised.	
22	Tunnel support activities are ongoing.	

No.	Comment	Photograph
23	Concrete pour to establish stabilised laydown.	
24	Concrete washout was not optimal but SBT advise that the arrangement was being monitored with the ER and currently deemed acceptable.	
SCAW Elizabeth Drive		
25	SCAWs clean water diversion for M12 (left of shot), with permanent and temporary basins to right of shot.	


No.	Comment	Photograph
26	Alignment underpass to the Western Sydney Airport	
SCAW Warragamba		
27	Viaduct erection over the Warragamba Pipeline.	
28	Piers are ready for remainder of the viaduct from Warragamba looking south.	
SCAW Defence		

No.	Comment	Photograph
29	Sediment fence not tied in. refer Section 3.2 of this Report.	
30	Looking south to viaduct erection over the Warragamba Pipeline.	
SCAW Cosgroves Creek and Unnamed Creek		
31	Permanent scour and bank protection has been installed.	

No.	Comment	Photograph
32	Permanent scour and bank protection has been installed. Grass strike is mixed.	
SCAW near Orchard Hills		
33	Culvert (right of shot) and fauna crossing (left of shot) installed with strong grass growth at Orchard Hills.	
34	Haul road constructed with colorbond fencing installed as per the agreement with residential stakeholder.	
FSM		

No.	Comment	Photograph
35	Pit protection in place.	
36	Waste segregation in place.	
37	Excavated general solid waste (on left) and concrete (on right) ready for removal from site.	
38	Overview of works (behind blue hoarding) on the St Marys platforms.	

No.	Comment	Photograph
39	Piling rig on platform	
40	<p>Evidence of tight working conditions. Excavated material is craned out over to the FSM yard for export off site. Hoarding is sealed into the platform to prevent any sediment leaving the work area.</p>	

No.	Comment	Photograph
41	<p>Evidence of tight working conditions. Excavated material is craned out over to the FSM yard for export off site. Hoarding is sealed into the platform to prevent any sediment leaving the work area.</p>	

APPENDIX F – DECLARATION

Project Name:	Sydney Metro Western Sydney Airport
Consent Number:	SSI 10051
Description of Project:	<p>Development of the Sydney Metro Western Sydney Airport project comprising:</p> <ul style="list-style-type: none"> • 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, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, • construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.
Project Address:	Sydney Metropolitan area
Proponent:	Sydney Metro
Title of Audit	Independent Audit No. 6
Date:	14 September 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 Post Approval Requirements (Department 2020)*;
- 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.

WolfPeak has involvements in this Project. Details are declared on page 2 of this document.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor:	██████████
Signature:	██████████
Qualification:	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company:	WolfPeak Pty Ltd

██████████ has no personal conflicts.

WolfPeak would like to declare the following involvement in the Project (as notified to the Department prior to the audit):

Sydney Metro Western Sydney Airport SSI 10051 – Station Box and Tunnels

One (1) staff member is acting as the ISC Independent Sustainability Professional (ISP) on the SBT package. According to the IS Technical Manual, the ISP must be independent from a Project. This staff member does not form part of the audit team. This support is expected to continue for the life of the package. This ISP engagement commenced after the first Independent Audit and was declared to Sydney Metro and the Department prior to commencing the second, third, fourth, fifth and sixth Independent Audits.

Historical involvements

Two (2) WolfPeak staff members were providing environmental support to the contractor. These people did not form part of the audit team. This was declared to Sydney Metro and the Department prior to commencing the first, second, third, fourth, fifth and sixth Independent Audits.

WolfPeak's involvement in this package was completed in October 2022 and we do not expect any further involvement at this time.

Sydney Metro Western Sydney Airport SSI 10051 – Surface and Civil Alignment Works

Two (2) staff members are providing sustainability support to the contractor. This support is expected to continue until mid-2025. The staff members do not form part of the audit. This involvement commenced after the first Independent Audit and was declared to the Sydney Metro and the Department prior to undertaking the second, third, fourth, fifth and sixth Independent Audits.

Historical involvements

One (1) WolfPeak staff member was providing environmental support to the contractor. This person did not form part of the audit team. This involvement commenced after the first Independent Audit and was declared to Sydney Metro and the Department prior to undertaking the second third, fourth and fifth Independent Audits.

WolfPeak's involvement in this package was completed in October 2022 and we do not expect any further involvement at this time.

Sydney Metro Western Sydney Airport SSI 10051 – SSTOM

WolfPeak is supporting the contractor with preconstruction environmental documentation including the Construction Environmental Management Plan and associated documents.

WolfPeak has not audited SSTOM at any time.

Controls in place to manage potential conflict

The following controls were/are in place to manage potential conflicts during the Independent Audit.

- WolfPeak will not audit its own work.
- None of the nominated WolfPeak audit team have provided or will provide any other services to the Project.
- None of the WolfPeak employees who have or are working for the contractor/s are on the WolfPeak audit team.
- The WolfPeak audit team has signed non-disclosure agreements with Sydney Metro.

- The WolfPeak employees who have or are working for the contractor/s have signed non-disclosures with the contractor/s.
- The following controls are in place to manage the potential for unintended sharing of information:
 - The WolfPeak employees who have or are working for the contractor/s have worked / are working in the contractor systems and drives. They have not or do not undertake work on the Project within WolfPeak systems and drives. The only records retained on the WolfPeak drives are the engagement contract / agreement and information required for invoicing (timesheets). To note, the WolfPeak ISC Independent Sustainability Professional is an independent role and therefore continues to work on WolfPeak systems.
 - The WolfPeak audit team does not have access to the contractor/s systems and drives unless this is arranged by the contractor during an Independent Audit in their role as an auditee and as a method of sharing files for the purposes of being subject to audit.
 - The WolfPeak Project (i.e.: Sydney Metro Independent Audit services) files / folders have been locked so only the WolfPeak audit team has access.
- WolfPeak team who have or are working for the contractor/s have not been / are not the owners of any of the documents being produced. WolfPeak assists with drafting and preparation for the contractor managers / advisors to finalise and implement.
- WolfPeak team who have worked on site for the contractor/s were not responsible for site works. WolfPeak provides feedback to the contractor managers / advisors to consider.