



# SSTOM Audit Report



**SMC-23-0933**

Sydney Metro

17 April 2024

➔ **The Power of Commitment**



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[Compliance statement]

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# Executive Summary

Sydney Metro engaged GHD Pty Ltd (GHD) to undertake an Independent Environmental Audit (IEA), as per the NSW Department of Planning Industry and Environment Independent Audit Post Approval Requirements (DPIE 2020), on the Stations, Services, Trains, Operations and Maintenance (SSTOM) contract components of the Sydney Metro Western Sydney Airport (SM WSA) project for compliance with the Critical State Significant Infrastructure (CSSI) approval 10051. The scope of the audit included off-airport construction sites at Orchard Hills station, St Marys station, Luddenham station, Aerotropolis Core station and the Stabling and Maintenance Facility (SMF).

The SM WSA project will deliver about 23 kilometres of rail between St Marys Station and the future Western Sydney Aerotropolis in Bringelly. Six stations are proposed to be built along the alignment, including two stations within Western Sydney International airport (Commonwealth) land, one at the Western Sydney Aerotropolis, at Luddenham Road and at Orchard Hills and one at St Marys where customers will be able to connect to the existing Sydney Trains suburban T1 Western Line. Proposed stations at Orchard Hills and Luddenham will service a future mixed-use precinct and a proposed education and innovation precinct.

The project is being delivered in three contract packages:

- Station Boxes and Tunnels (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Services, Trains, Operations and Maintenance (SSTOM)

Condition A36 of SSI-10051 requires an independent environmental audit (IEA) to be undertaken within 12 weeks of the commencement of construction. The audit constitutes the first audit for the SSTOM works.

At the time of audit, Sydney Metro SSTOM works were in the early stages of construction and site establishment.

The audit comprised review of documentation, a site inspection on 13 February 2024 including interview with site personnel and inspection of works underway at the time, as well as reporting of findings (this audit report). The audit was undertaken in accordance with the requirements of ISO 19011:2018 Guidelines for auditing management systems and DPIE 2020.

Environmental performance of the project was reviewed by assessing compliance with the requirements in SSI-10051 Approval Document and by general observations during the site inspection visit. The auditors visited two sites during the site inspection – St Marys station and the Orchard Hills station sites. The sites were generally kept in good condition with regard to maintenance of required documentation and display of Erosion and Sediment Control Plans (ESCP) and implementation of them. Discussion with site personnel indicated good understanding of requirements and awareness of potential issues, including where different contract works are ongoing in adjacent locations. Some observations are presented in the photos. A few correction requests were raised during site inspection at the St Marys station site. This included potential dust sources in construction material handling area, minor fugitive garbage items not sorted in bins, water ponding at the truck wash facility and a diesel can found not to be within a bunded area.

A few gaps in available documentation as evidence have been raised in this audit.

This report is subject to, and must be read in conjunction with, the limitations set out in Section 1.3 and the assumptions and qualifications contained throughout the report.

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# Abbreviations

AEW	Advanced and Enabling Works
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CSSI	Critical State Significant Infrastructure
DNVIS	Detailed Noise and Vibration Impact Statement
DPIE	Department of Planning, Industry and Environment (replaced by DPHI)
DPHI	Department of Planning, Housing and Infrastructure
EMP	Environmental Management Plan
EMS	Environment Management System
EPBC	Environment Protection and Biodiversity Conservation (Act)
ESCP	Erosion and Sediment Control Plan
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GHD	GHD Pty Ltd
IEA	Independent Environmental Audit
PAR	Post Approval Requirements
PLM	Parklife Metro
SBT	Station Boxes and Tunnels
SCAW	Surface and Civil Alignment Works
SMF	Stabling and Maintenance Facility
SSTOM	Stations, Services, Trains, Operations and Maintenance
WSA	Western Sydney Airport

# 1. Introduction

Sydney Metro engaged GHD Pty Ltd (GHD) to undertake an Independent Environmental Audit (IEA) of the Stations, Services, Trains, Operations and Maintenance (SSTOM) contract component of Sydney Metro Western Sydney Airport (SM WSA) project, located at St Marys, Orchard Hills, Luddenham, the Aerotropolis Core and the Stabling and Maintenance Facility (SMF) sites, New South Wales (NSW). The works which were the subject of the audit are located within the Penrith City Council and Liverpool City Council local government areas in western Sydney, NSW.

Sydney Metro WSA holds approval for Off-Airport works through the Critical State Significant Infrastructure approval SSI-10051 issued under Section 5.19 of the Environmental Planning & Assessment Act 1979 by the NSW Minister for Planning and Public Spaces on 23 July 2021. This includes the approval of the post approval documents being the Construction Environment Management Plan, Construction Environmental Management Framework (CEMF) and associated Construction Environmental Management sub-plans and monitoring programs, Sustainability and Community Plans.

## 1.1 Project background

The SM WSA project will deliver about 23 kilometres of rail between St Marys Station and the future Western Sydney Aerotropolis in Bringelly. Six stations are proposed to be built along the alignment, including two stations within Western Sydney International airport (Commonwealth) land, one at the Western Sydney Aerotropolis, at Luddenham and at Orchard Hills and one at St Marys where customers will be able to connect to the existing Sydney Trains suburban T1 Western Line. Proposed stations at Orchard Hills and Luddenham will service a future mixed-use precinct and an education and innovation precinct.

The project is being delivered in three contract packages:

- Station Boxes and Tunnels (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Services, Trains, Operations and Maintenance (SSTOM)

Parklife Metro D&C Consortium (PLM) is delivering the SSTOM contract for the joint Australian and NSW governments project, as the largest Public Private Partnership project awarded in NSW.

## 1.2 Audit scope

The scope of the audit is defined by SSI 10051 condition A36-40:

*A36 Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).*

*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.*

*A38 Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit.*

*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.*

*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.*

The methodology used by GHD to complete the audit is provided in Section 2. This audit constitutes the first audit for the SSTOM works however the 5th IEA for the SM WSA.

## 1.3 Limitations

This report has been prepared by GHD for Sydney Metro and may only be used and relied on by Sydney Metro for the purpose agreed between GHD and Sydney Metro as set out as per Section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Sydney Metro arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer Section(s) 1.3 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

### Accessibility of documents

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

## 1.4 Independent Audit Report Declaration

The Auditor's Declarations of Independence, as per the Independent Audit Post Approval Requirements (PAR 2020) are included in Appendix A.

## 1.5 Audit team

An appropriate audit team was selected with skills and experience in environmental auditing to ensure that an adequate assessment of compliance with the CSSI approval could be made. Approval for the proposed audit team was secured from DPHI prior to commencement of the audit (refer Appendix B).

The GHD audit team comprised:

- Dr Avanish Panikkar – GHD Project Manager, Lead Auditor
- Demelza Scott – Project Director and Audit Technical Reviewer
- Emily Kate Marsh – Support Auditor



## 2. Audit process

The audit was carried out in accordance with the requirements of ISO 19011:2018 ‘Guidelines for auditing management systems’ and the ‘Independent Audit Post Approval Requirements’ (DPIE, 2020). In particular, the GHD team conducted the audit considering the following:

- The key principles of auditing including the requirement of auditors to conduct themselves in an ethical manner, report truthfully and accurately, be diligent and have the appropriate competency to conduct the audit, be independent, and apply an evidence-based approach to conducting the audit.
- The audit objectives, scope and criteria were based on the CSSI approval. The scope of the audit was limited to the scope specified in Section 1.2.
- As per DPIE 2020 requirements, stakeholder consultation was undertaken (see Section 2.1 and Appendix C).
- Relevant documentation (as detailed below) was reviewed prior to the audit to make an initial determination of conformity of the system to the requirements of the CSSI approval, and to prepare an audit checklist containing appropriate questions to address during the site audit.
- Audit opening and closing meetings were conducted with the auditee to explain the format of the audit upfront and to highlight preliminary audit findings at the conclusion of the site audit.
- An inspection of the site was conducted to verify relevant compliance aspects of the audit. During the site inspection, audit interviews were conducted with Sydney Metro personnel and additional documentary evidence was collected. Relevant evidence in the form of photographic evidence was also collected (refer Appendix D).
- Verifiable evidence was collected and recorded throughout the audit and evaluated against the CSSI approval to determine compliance status. All evidence was recorded on the Compliance Table (Appendix E).

### 2.1 Stakeholder consultation

As required by DPIE 2020, GHD consulted with the stakeholders outlined in Table 2.1 prior to the site audit. A letter was sent to each of the stakeholders advising them of the upcoming audit, GHD’s role in conducting the audit and invited comment on Sydney Metro’s performance with regards to the requirements of the approval related to their organisation. GHD received comment from DPHI, Liverpool City Council and Penrith City Council as shown in Table 2.1 and detailed in Appendix C.

*Table 2.1 Stakeholder consultation*

Stakeholder agency	Consultation letter issued	Response received date
Department of Planning, Housing and Infrastructure (DPHI)	20 Dec 2023	22 Jan 2024
Liverpool City Council	20 Dec 2023	16 Jan 2024
Penrith City Council	20 Dec 2023	8 Jan 2024
NSW Environment Protection Authority (NSW EPA)	9 Jan 2024	n/a

### 2.2 Document review

GHD reviewed documentation associated with the construction activities associated with the SSTOM contract. Sydney Metro and PLM provided a number of documents for review including, but not limited to:

- Construction Environmental Management Plan, sub plans and monitoring programs.
- Environmental Representative (ER) reports.
- Endorsement by ER and approval by DPIE of above plans and monitoring programs.
- Detailed Noise and Vibration Impact Statement and reports.

- Construction Traffic Management plan and site-specific plans.
- EPL reports.
- Community Consultation Strategy and documents.
- SM WSA Sustainability Plan etc.

The documentation sighted by the auditors is referenced throughout Appendix E.

## 2.3 Site audit and inspection

The inspection was conducted by GHD auditors Avanish Panikkar and Emily Kate Marsh on 13 February 2024.

The GHD audit team comprised:

- Dr Avanish Panikkar – GHD Project Manager, Lead Auditor
- Emily Kate Marsh – Support Auditor

The audit opening meeting was attended by:

- Hugh Chapman (Sydney Metro)
- Chris Berg (Sydney Metro)
- Chris Dickson (Sydney Metro)
- Marea Rakete (Sydney Metro)
- Colm Kennedy (PLM)

The audit team conducted interviews with site personnel and made observations guided by the audit criteria addressing the conditions of SSI 10051. The site inspection activities included inspection of:

- Orchard Hills construction site
- St Marys construction site

Conditions on the day of the site inspection were sunny, calm and clear. Photographs and observations from the site inspections are provided in Appendix D.

A number of documents were provided to the audit team prior to the onsite component of the audit. Where possible, documents and data collected during the audit were reviewed whilst on site. Additional documents that were not available prior to or during the onsite component were provided following the audit. The auditees were cooperative and supportive to the audit process. All information obtained during the audit process was verified by the audit team as practically possible e.g., statements made by site personnel were verified by viewing documentation and/or visual observations made during the site inspection.

## 2.4 Assessment and Reporting

The assessment criteria used to determine compliance, as per DPIE 2020 are outlined in Table 2.2.

*Table 2.2 Compliance status descriptors*

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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

*Note: As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in Table above.*

This report presents the findings of the audit of the SSTOM works required by Condition A36 of SSI 10051. This report responds to the scope of the audit as outlined in Table 2.3.

**Table 2.3**      *Audit scope requirements*

<b>Requirement</b>	<b>Where addressed?</b>
<p>An assessment of compliance with:</p> <ul style="list-style-type: none"> <li>all conditions of CSSI approval applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation</li> <li>all post approval and compliance documents prepared to satisfy the conditions of the CSSI approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, and</li> <li>all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.</li> </ul>	Appendix E
<p>A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:</p> <ul style="list-style-type: none"> <li>actual impacts compared to predicted impacts documented in the environmental impact assessment</li> <li>the physical extent of the development in comparison with the approved boundary</li> <li>incidents, non-compliances and complaints that occurred or were made during the audit period</li> <li>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</li> <li>feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period.</li> </ul>	Appendix E Section 3
<p>The status of implementation of previous Independent Audit findings, recommendations and actions (if any)</p>	n/a
<p>A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate</p>	Section 3.2
<p>Any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices</p>	Appendix D Appendix E

## 3. Audit findings

The approval SSI-10051 and DPIE Post Approval Requirements (2020) required the audit to assess:

- Environmental performance of the project.
- Compliance with the relevant requirements of the approval, implementation of management plans and any other environmental licences or approvals.
- Adequacy of any approved environmental management plans and subplans required under this approval.

The following sections outline the audit's assessment of Sydney Metro's and Parklife Metro's (PLM) environmental performance, compliance with SSI-10051 and adequacy of environmental management plans and subplans for the SSTOM package.

### 3.1 Overall environmental performance

The audit inspections included two construction sites – at St Marys Station and Orchard Hills Station. Due to time constraints the Luddenham Road and Aerotropolis sites were not visited. The sites inspected were generally well maintained and a number of positive measures were observed during the audit that demonstrated compliance with many of the requirements of SSI-10051. Throughout the sites, well-stocked spill kits were observed, personnel were aware of the emergency control systems and erosion and sediment control devices were properly maintained. Display of Erosion and Sediment Control Plans (ESCP) was found to be satisfactory at both sites visited.

Some correction requests were raised with site personnel at St Marys with regard to incorrect placement of objects, water ponding at truck wash facility, and minor accumulation of construction debris that could become potential localised dust source (refer to Appendix D). The corrective actions were advised to site personnel and Sydney Metro / PLM representatives. Due to the stage of works under SSTOM contract, matters such as chemical / hazardous goods storage were not advanced. A few containers with chemicals were observed to be placed on raised bunded structures. A self-bunded chemical storage shed was found to be mostly empty (refer to Appendix D).

At the Orchard Hills station site, ponding of storm water and leaked water from service lines was observed. This was at the border of the SSTOM site shared with the SBT contractor work area and auditors were advised that a joint rectification effort was on the way.

#### 3.1.1 Complaints

Sydney Metro maintains a complaint management system, as per the approved Complaint Management System document. Details of each complaint and complainant are entered. Weekly and monthly extracted reports are provided to PLM and reported as required. No major complaints were noted in the list and most complaints have been resolved at the time of this audit.

#### 3.1.2 Incidents

SSTOM works are in early stages and no major incidents have been reported. An incident against condition E57 regarding the Out-of-hours delivery of the piling rig at Orchard Hill site has been reported to DPHI, following the required procedures. An incident where water was discharged to the discharge point from the sediment basin at Aerotropolis Core site without obtaining a permit from the Environment Team was reported as an NCR against condition C10.

## 3.2 Management Plans

The audit assessed the adequacy of the strategies and management plans prepared for the SSTOM works. Adequacy was determined based on inclusion of content in relevant conditions and Independent Audit Post Approval Requirements (2020), suitability of the plans for construction and effectiveness in managing

environmental impact of the SSTOM works. Plans reviewed included the Construction Environmental Management Plan (CEMP) including appended subplans and monitoring programs.

The CEMP, sub plans and monitoring programs were found to be comprehensive and have been approved by the Environmental Representative (ER) and the Planning Secretary as per relevant conditions. This audit did not include a detailed review of the adequacy of those plans other than as required per the SSI 10051 conditions noted in below sections of this report and Appendix E. However, it is noted that documentation with regard to approval requirements and monitoring requirements have been established in a mature way. CEMP, sub plans and monitoring programs have been prepared with required endorsement and approvals obtained prior to commencement of construction. These documents address the requirements of the CSSI approval conditions and align with the EIS and Submissions Report as relevant. It is noted that, due to the staging of the project, the previous contracts have prepared the relevant documentation which have been adopted as relevant. Some details were not available to review in this audit that would clarify many of the observations made in Appendix E.

### **3.3 Construction Environmental Management**

The CEMP states that PLM is using a modular construction management software, Glaass Pro, to manage safety, quality and environmental compliance requirements including reporting of incidents, hazards, near misses, inspection findings, non-compliances and corrective actions. This was mentioned to be managed well in conjunction with the SAI Global 360 software used by Sydney Metro.

As per the Administrative Conditions of SSI 10051, detailed CEMP, sub plans and monitoring programs have been developed. Evidence of their implementation via routine site inspection reporting is undertaken as per Table 13 of the CEMP which includes weekly environmental inspection reports, EPL reporting, construction monitoring reports and quarterly environmental performance reports. EPL reports are available on the project website. Air quality monitoring reports and surface water quality construction monitoring reports will be prepared annually and are not yet due. Specific noise and vibration monitoring data are captured in Detailed Noise and Vibration Impact Statement (DNVIS) reports, three of such reports are currently available on the project website. Results of monitoring undertaken in implementing the monitoring programs are used to inform project reporting requirements as per Section 3.9 of the CEMP.

The weekly environmental inspection reports were not provided in this audit. Groundwater monitoring program Section 8.5.1 refers to detailed periodic review and reporting of groundwater level and quality and submitting reports to DPE Water, Sydney Water and Sydney Metro within 60 days of the reporting period. As per available documentation, the groundwater monitoring was being undertaken by SBT, therefore this condition was not assessed in this audit on SSTOM.

Timely reporting to Road Authorities as per the Construction Traffic Management Plan was also could not be verified in this audit (as per CTMP Section 1.6).

### **3.4 Administrative Conditions**

Sydney Metro and PLM maintain separate detailed project websites for the SSTOM package of works, and the management plans, monitoring programs, sustainability reports etc are available on the PLM website.

As per SSI-10051 condition A37, an audit program outlining the scope and timing of each independent audit planned for during the construction period, in consultation with and approved by the Planning Secretary, is to be established. However, Sydney Metro clarified that the audit program is following the Independent Audit Post Approval Requirements (DPIE 2020).

### **3.5 Community Information and Reporting**

A detailed complaints management system was evidenced, managed by Sydney Metro. Weekly and monthly extracts of the complaints registers are provided to PLM. There were no un-resolved complaints or incidents recorded at the time of the audit. Adequate signage and hoardings with project details and contact information were sighted at the sites visited (refer to Appendix D).

## 3.6 Operational Environmental Management

Part D of the SSI 10051 approval conditions include operational environmental management requirements. As the project is in construction phase, this set of conditions have not been triggered.

## 3.7 Key Issue Conditions

Majority of the SSI 10051 approval conditions are listed under Part E, Key Issue Conditions. It is noted that majority of these conditions were not applicable to SSTOM (deemed Not Triggered) due to staging of the works, or the recent handover of sites to PLM from previous contractors handling the SBT and SCAW packages of works. A few documentation clarifications were required, as noted in Appendix E.

## 3.8 Audit findings summary

A summary of compliance with the SSI 10051 conditions of approval is provided in Table 3.1. Compliance was assessed against each sub-condition across the total 222 conditions as noted in Appendix E. No non-compliances were noted however a number of observations have been raised.

Table 3.1 Summary of compliance

SSI 10051 Requirement	Compliant	Non-compliant	Not Triggered
Part A Administrative Conditions (47)	29	0	13
Part B Community Information and Reporting (11)	10	0	1
Part C Construction Environmental Management (22)	21	0	1
Part D Operational Environmental Management (8)	0	0	8
Part E Key Issue Conditions (134)	68	0	66
TOTAL (222)	128	0	89

Note: Conditions that could not be assessed for compliance have been designated as Note in Appendix E and as such, are not included in the above compilation.

Table 3.2 Summary of observations

Observation Identifier	Condition	Observation
OBS-A-1	A22	Poor maintenance of ground causing collection of water near wheel wash system and buildup of sediment potentially causing dust hazard and sediment pollution at St Marys. This was noted and discussed at the audit site inspection. See Appendix D photos 19-20 and 22.
OBS-A-2	A32	ER Reports do not specifically refer to receiving or not receiving communication from Planning Secretary. As such, it is not clear if this sub-condition has been triggered or not.
OBS-B-1	B8	Accreditation details as per National Mediator Accreditation System accreditation details were not available to verify in this audit.
OBS-E-1	E56	The OOHW schedules are not detailed on the respite or mitigation details. There are activities with 20-30dB noise occurring at night, however, there are no respite or mitigation measures included.
OBS-E-2	E79 f, h, i	The compliance table in Section 1.6 notes that this document is preliminary, with more details to be included in the Stage 2 document. This to be confirmed at next audit.
OBS-E-3	E102	Water Reuse Strategy does not include details of consultation or advice from any agencies, or justification for not seeking that advice.

## 4. Recommendations

Detailed audit findings are included in Appendix E. Correctives actions and recommendations of the audit are outlined in Section 4.1 and Section 4.2.

### 4.1 Corrective actions

Corrective actions (CA) are required to correct matters of compliance identified by the audit. As no non-compliances were noted in this audit, no CA is prescribed.

### 4.2 Recommendations

The below recommendations are provided to address matters of concern due to lack of adequate documented information or matters that may lead to a non-compliance or to address observations raised, where elements of the proponent's systems and plans were not found to be adequate, or from site inspection.

Table 4.1 Summary of recommendations

Recommendation Reference	Condition	Recommendation
OBS-A-1	A22	Improve maintenance of ground conditions at truck wash facility to avoid ponding of water and buildup of sediment potentially causing dust hazard and sediment pollution.
OBS-A-2	A32	ER monthly reports should clarify each sub condition in this condition A32 and conform to the ER Protocol.
OBS-B-1	B8	Provide accreditation details of community complaints mediator as onboarded.
OBS-E-1	E56	Provide details of how respite or mitigation of noise impacts from construction of the CSSI is being managed.
OBS-E-2	E79 f, h, i	Stage 2 final PUDCLP to include all details as noted in Stage 1 document. This to be confirmed at next audit.
OBS-E-3	E102	Water Reuse Strategy should include details of consultation or advice from any agencies, of justification for not seeking such advice.

# Appendices



# **Appendix A**

## **Independent Audit Report Declaration Form**

## Appendix E – Independent Audit Report Declaration Form Template

### Independent Audit Report Declaration Form

Project Name	Sydney Metro WSA Independent Environmental Auditing Services
Consent Number	SSI10051
Description of Project	Independent Environmental Audit of the SM WSA component of the audit program as per SSI10051 conditions
Project Address	Sydney Metro WSA SSTOM contract scope
Proponent	Sydney Metro
Title of Audit	SSTOM Audit Report
Date	17 April 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Name of Auditor    Avnish Panikkar

Signature



Qualification

CEnvP, Exemplar Global Principal Environmental Auditor, PhD., MEngSc. B.Tech Hons

Company

GHD Pty Ltd

Company Address

Level 2, 60 Station St, Parramatta NSW 2150

---

# 6. Appendices

## Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Sydney Metro WSA Independent Environmental Auditing Services
Consent Number	SSI10051
Description of Project	Independent Environmental Audit of the SM WSA component of the audit program as per SSI 10051 conditions
Project Address	Sydney Metro WSA SSTOM contract scope
Proponent	Sydney Metro
Date	11/12/2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and


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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 Proposed Auditor    Dr Avanish Panikkar

---

Signature    

---

Qualification    CEnvP #1472, Exemplar Global certified Principal Env Auditor #113142,  
PhD., MEngSc., BTech Hons

---

Company    GHD Pty Ltd

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---

# 6. Appendices

## Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Sydney Metro WSA Independent Environmental Auditing Services
Consent Number	SSI10051
Description of Project	Independent Environmental Audit of the SM WSA component of the audit program as per SSI 10051 conditions
Project Address	Sydney Metro WSA SSTOM contract scope
Proponent	Sydney Metro
Date	12/12/2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and


---

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

---

Name of Proposed Auditor      Demelza Scott

---

Signature      

---

Qualification      Exemplar Global Certified Lead Environmental Auditor

---

Company      GHD Pty Ltd

---

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# 6. Appendices

## Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Sydney Metro WSA Independent Environmental Auditing Services
Consent Number	SSI10051
Description of Project	Independent Environmental Audit of the SM WSA SSTOM component of the audit program as per SSI 10051 conditions
Project Address	Sydney Metro West SSTOM contract scope
Proponent	Sydney Metro
Date	24/01/2024

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and



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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 Proposed Auditor    Emily Kate-Marsh

---

Signature    *Emily Kate Marsh*

---

Qualification    Environmental Consultant

---

Company    GHD Pty Ltd

---

# **Appendix B**

**Audit Team Approval**

## Department of Planning and Environment

Our ref: SSI-10051-PA-332 & 337

Your ref: SM-23-00894190 & 00904055

via Major Projects Portal

19 December 2023

Attention: Mr Hugh Chapman, Director Environment, Sustainability & Planning

---

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

Dear Hugh,

I refer to your letters dated 20 November 2023 (PA-332) and 05 December 2023 (PA-337) 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).

In your letters you set out that due to WolfPeak having an identified conflict of interest for the stations, systems, trains, operations and maintenance (**SSTOM**) stage delivered by the Parklife Metro consortium, the fifth construction phase independent environmental audit is proposed to comprise two separate audits by two separate auditors. The SSTOM stage, which commenced construction on 08 August 2023 (PA-279), was not in scope for the first four independent environmental audits conducted by WolfPeak therefore this is a new proposal.

NSW Planning has reviewed your letters, and the additional information provided, against the *Independent Audit Post Approval Requirements (2020; Independent Audit PARs)*.

### **Independent auditor (PA-337) – SSTOM stage excluded**

NSW Planning is satisfied that the nominees are certified with Exemplar Global as lead auditors in environmental management systems, are suitably experienced in critical state significant infrastructure projects, and have supplied declarations of independence. Consistent with the declarations of independence, the SSTOM stage must not be audited by WolfPeak.

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

- Mr Derek Low, Wolfpeak, as lead auditor
- Mr Ricardo Prieto-Curiel, Wolfpeak, as auditor.

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

## Department of Planning and Environment

### Independent auditor (PA-332) – SSTOM stage only

NSW Planning is satisfied that the nominees are certified with Exemplar Global as either principal or lead auditors in environmental management systems and have supplied declarations of independence. NSW Planning requires the declarations of independence be updated to include all work performed by GHD on the Sydney Metro Western Sydney Airport project (SSI-10051, as modified) prior to being appended to the independent audit report (*a template for independence declarations is provided in Appendix E of the Independent Audit PAR's*).

NSW Planning notes however that the nominees have not provided examples of construction audits against the Independent Audit PARs, much less for complex critical State significant infrastructure projects like Sydney Metro. NSW Planning has reservations regarding the representations made by the nominees regarding their experience auditing against the Independent Audit PARs and requires future nominations to identify specific audits conducted by the nominee against the Independent Audit PARs.

Noting the reservations above, I can advise that under Condition A38 of SSI-10051, the Planning Secretary has approved the following auditors for the fifth construction phase independent audit – SSTOM stage only:

- Mr Avanish Panikkar, GHD, as lead auditor
- Ms Demelza Scott, GHD, as auditor.

NSW Planning acknowledges that the approved auditors may be supported by others, each of whom must also provide a declaration of independence which must be appended to the independent audit report.

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 fifth 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 28 February 2024

## Department of Planning and Environment

- 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.

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.

Please note that a further auditor nomination must be made and written agreement from the Planning Secretary provided prior to undertaking any subsequent independent audits. NSW Planning reserves the right to request an alternate auditor(s) for future audits.

Should you wish to discuss the matter further, please contact Ms Alex McGuirk, Senior Compliance Officer, or myself from 8 January 2024.

Yours sincerely,

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

Rob Sherry

**Team Leader Compliance – Government Projects**

NSW Planning

*As nominee of the Planning Secretary*

# **Appendix C**

## **Stakeholder Consultation**

Your ref: -  
Our ref: 12610305

20 December 2023

**Rob Sherry**  
Team Leader - Compliance - Government Projects  
NSW Department of Planning and Environment

via email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

## **Sydney Metro Western Sydney Airport (SSI-10051) SSTOM contract - Independent Environmental Audit**

Dear Rob

GHD Pty Ltd has been engaged by Sydney Metro to undertake an independent environmental audit of the Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) stage of works delivered by Parklife Metro Consortium, in accordance with the Development Consent granted by the Department of Planning and Environment (DPE) SSI-10051. Sydney Metro, as proponent, and the SSTOM contractor have auditable obligations under the SSI-10051.

The scope of the Audit is to:

- Assess the environmental performance of the project
- Assess whether the project is complying with the requirements in the consent (including any assessment, plan or program required under these approvals) applicable to the phase of the development being audited
- Review the adequacy of strategies, plans or programs required under the consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

I am writing to you to invite comments from DPE Compliance team regarding these obligations. As part of initial consultation, I will be requesting comments from Liverpool City Council and Penrith City Council. I also request DPE to advise which other stakeholders should be consulted in relation to this audit.

It would be appreciated if you could provide your comments on the performance of Sydney Metro and SSTOM contractor in meeting these obligations pertaining to:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken etc.

I also invite you to comment on the SSTOM contractors' performance with any other requirements relevant to this project, as you may deem appropriate.

The site visit for the audit is planned to occur in early February 2024. We would be available for a short teleconference, prior to the audit, in late January 2024, to discuss your feedback so that we may adequately address any concerns during the audit.

Upon receipt of this letter, please advise GHD of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by COB Friday 19 January 2024.

All correspondence in relation to this matter should be directed to Avanish Panikkar, GHD Lead Auditor on 02 9239 7667 or [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com).

Regards



**Avanish Panikkar**  
Senior Environmental Engineer, Lead Auditor  
02 9239 7667  
[avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)



**From:** [Alex McGuirk](#)  
**To:** [Avanish Panikkar](#)  
**Subject:** RE: Sydney Metro - Western Sydney Airport - Auditor nomination A38 - construction #5  
**Date:** Monday, 22 January 2024 5:16:28 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image011.png](#)

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You don't often get email from alex.mcguirk@dpie.nsw.gov.au. [Learn why this is important](#)

Hi Avanish,

Thank you for your letter below and your time last Friday.

As set out in the Sydney Metro Western Sydney Airport infrastructure approval (SSI-10051, as modified) conditions A36 & A40, as the approved independent auditor you must conduct and carry out the audit in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).

As set out in your letter and discussed last Friday:

- the audit scope is the stations, systems, trains, operations and maintenance (SSTOM) stage
- the auditee is both Sydney Metro and the SSTOM contractor
- you are also consulting with the relevant Councils (Penrith, Liverpool) and the Environment Protection Authority
- not all SSTOM construction sites will be inspected, however at a minimum St Marys and Orchard Hills are to be inspected
- currently there are no further comments on the auditees' environmental performance.

Please don't hesitate to contact me should you wish to discuss further,

**Alex McGuirk**

**Senior Compliance Officer**

NSW Planning | Department of Planning Housing & Infrastructure

Locked Bag 5022 | PARRAMATTA NSW 2124

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



---

**From:** Avanish Panikkar <Avanish.Panikkar@ghd.com>

**Sent:** Wednesday, 20 December 2023 4:37 PM

**To:** DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

**Cc:** Alex McGuirk <Alex.McGuirk@dpie.nsw.gov.au>

**Subject:** RE: Sydney Metro - Western Sydney Airport - Auditor nomination A38 - construction #5

Dear Rob/Alex

Further to below advice on the subject Independent Environmental Audit on SSI-10051, please find attached a letter requesting your input into the SSTOM audit.

Please let me know if you have any questions or comments.

Regards  
Avanish

---

## Dr Avanish K Panikkar

CEnvP., Ph.D., M.Eng.Sc., B.Tech (hons); M.EIANZ, M.AWA  
**Accredited Principal Env. Auditor (ExemplarGlobal #113142)**  
IPART Approved WICA Lead Auditor  
JAZ-ANZ Water Quality Technical Expert  
Adjunct Senior Lecturer at Griffith University  
EIANZ NSW division committee, EIANZ PAeM committee  
**Senior Environmental Engineer**

## GHD

**Proudly employee-owned | [ghd.com](https://ghd.com)**  
Level 2, 60 Station St E, Parramatta NSW 2150 Australia  
D +61 2 9239 7667 | E [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)



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**From:** Chris Berg <[Chris.Berg@transport.nsw.gov.au](mailto:Chris.Berg@transport.nsw.gov.au)>

**Sent:** Tuesday, December 19, 2023 12:25 PM

**To:** Avanish Panikkar <[Avanish.Panikkar@ghd.com](mailto:Avanish.Panikkar@ghd.com)>

**Cc:** Demelza Scott <[Demelza.Scott@ghd.com](mailto:Demelza.Scott@ghd.com)>; Chris Dickson <[Chris.Dickson@transport.nsw.gov.au](mailto:Chris.Dickson@transport.nsw.gov.au)>; Hugh Chapman <[Hugh.Chapman@transport.nsw.gov.au](mailto:Hugh.Chapman@transport.nsw.gov.au)>

**Subject:** FW: Sydney Metro - Western Sydney Airport - Auditor nomination A38 - construction #5

**Importance:** High

Hi Avanish

Please find enclosed DPE approval of GHD as Independent Auditor on WSA – SSTOM under A38.

As discussed previously, can you please commence consultation with DPE on the audit scope with no further delay, and provide Sydney Metro with a draft audit program with the aim to undertake the audit in early February in order to align with the 5<sup>th</sup> Independent Audit on SBT and SCAW?

Please ensure that you are aware of the information contained within the attached, particularly those that relate to how the audit report is to be undertaken in accordance with the Independent Audit PAR's and required declarations to be included within the final audit report

Further, and in Sydney Metro's recent discussions with DPE, they are expecting to be consulted with this side of the Xmas break for both inputs on the audit scope and to advise which agencies / stakeholders are to be consulted with as part of the audit. Please address this request to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Feel free to reach out direct to Chris Dickson or myself should you have any questions.

Best regards

**Chris Berg**

A/ Senior Manager Environment  
Western Sydney Airport

M 0436 321 184

[sydneymetro.info](http://sydneymetro.info)

Level 43, 680 George Street, Sydney NSW 2000  
PO Box K659, Haymarket NSW 1240



---

OFFICIAL

**From:** [no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au) <[no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au)>

**Sent:** Tuesday, 19 December 2023 11:54 AM

**To:** Chris Berg <[Chris.Berg@transport.nsw.gov.au](mailto:Chris.Berg@transport.nsw.gov.au)>

**Cc:** Tim Solomon <[Tim.Solomon@transport.nsw.gov.au](mailto:Tim.Solomon@transport.nsw.gov.au)>

**Subject:** Sydney Metro - Western Sydney Airport - Auditor nomination A38 - construction #5

**CAUTION:** This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Dear Chris ,

The Department has completed its assessment of the Auditor nomination A38 - construction #5 for the Sydney Metro - Western Sydney Airport

The Department's comments are attached.

If you have any enquiries, please contact Alex McGuirk on 8289 6865 at [Alex.McGuirk@dpie.nsw.gov.au](mailto:Alex.McGuirk@dpie.nsw.gov.au).

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning and Environment



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Your ref: -  
Our ref: 12610305

20 December 2023

Mr John Ajaka  
Chief Executive Officer  
Liverpool City Council  
Moore St, Liverpool NSW 2170

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

## **Sydney Metro Western Sydney Airport (SSI-10051) SSTOM contract - Independent Environmental Audit**

Dear John

GHD Pty Ltd has been engaged by Sydney Metro to undertake an independent environmental audit of the Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) stage of works delivered by Parklife Metro Consortium, in accordance with the Development Consent granted by the Department of Planning and Environment (DPE) SSI-10051. Sydney Metro, as proponent, and the SSTOM contractor have auditable obligations under the SSI-10051.

The scope of the Audit is to:

- Assess the environmental performance of the project
- Assess whether the project is complying with the requirements in the consent (including any assessment, plan or program required under these approvals) applicable to the phase of the development being audited
- Review the adequacy of strategies, plans or programs required under the consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

I am writing to you to invite comments from Liverpool City Council regarding these obligations.

It would be appreciated if you could provide your comments on the performance of Sydney Metro and SSTOM contractor in meeting these obligations pertaining to:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken etc.

I also invite you to comment on the SSTOM contractors' performance with any other requirements relevant to this project, as you may deem appropriate.

The site visit for the audit is planned to occur in early February 2024. We would be available for a short teleconference, prior to the audit, in late January 2024, to discuss your feedback so that we may adequately address any concerns during the audit.

Upon receipt of this letter, please advise GHD of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by COB Friday 19 January 2024.

All correspondence in relation to this matter should be directed to Avanish Panikkar, GHD Lead Auditor on 02 9239 7667 or [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com).

Regards



**Avanish Panikkar**  
Senior Environmental Engineer, Lead Auditor  
02 9239 7667  
[avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)

Dr Avanish K Panikkar  
Senior Environmental Engineer  
GHD  
Level 2, 60 Station Street E  
**PARRAMATTA NSW 2150**

By email: [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)

Dear Avanish

**Re: Sydney Metro Western Sydney Airport (SSI-10051) SSTOM contract – Independent Environmental Audit**

I refer to your email and letter dated 20 December 2023 regarding an upcoming independent environmental audit of the Sydney Metro Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) stage of works approved under SSI-10051 by the Minister for Planning and Public Spaces. It is understood that the audit will be undertaken in accordance with Conditions A36-A40 of SSI-10051 and the Department's 2020 Independent Audits Post Approval Requirements (IAPAR). The audit relates to construction requirements and compliance for the Project.

In accordance with Section 3.2 of the IAPAR and the Department's instructions, GHD Pty Ltd is consulting with Council regarding the Project's environmental performance and audit scope. The required audit scope is outlined in Section 3.3 of the IAPAR and necessitates an assessment of all conditions of consent applicable to the phase of the development. Furthermore, GHD Pty Ltd is required to assess conformance with 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.

As part of the consultation requirements, GHD Pty Ltd requested Council to provide feedback regarding the performance of Sydney Metro and SSTOM contractor in meeting obligations pertaining to: compliance with requirements; progress to meeting requirements; details of incidents of non-compliance; and adequacy of actions taken. In addition to these requirements, it is recommended that GHD Pty Ltd considers whether any subsequent adjustments are necessary to the scope of the forthcoming audit beyond that identified within Section 3.3 of the IAPAR.

In terms of site regulation, the Department has primary responsibility for assessing compliance with conditions of consent in relation to environmental emissions (i.e. noise, air, water, land) during the construction and operational phases of the Project. Furthermore, the NSW EPA regulates freight and passenger train operators, railway infrastructure operators and railway construction work operators via environment protection licences. As Council is not the Appropriate Regulatory Authority or relevant enforcement authority for the Project, the auditor is encouraged

to make further enquiries with the NSW EPA and NSW Department of Planning, Housing and Infrastructure regarding the Project's environmental performance and compliance.

To enable a comprehensive review to be undertaken, it would be necessary for the auditor to identify all conditions of consent applicable to the phase of the development being audited. Consistent with Section 3.3 of the IAPAR, the auditor must review the environmental performance of the development with consideration for the Environmental Impact Statement and assess the adequacy of the Environmental Management Plans and sub-plans. In this regard, it would be appreciated if the auditor could review consultation, management and monitoring program requirements for the construction phase of the Project including: incident and non-compliance notification and reporting (Conditions A41 to A45); community communication strategy (Condition B1); and complaints management system (Conditions B2 to B10).

It is requested that the audit's scope encompasses all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the Construction Environmental Management Plan (Conditions C1 to C12) and Construction Monitoring Programs (Conditions C13 to C22). The auditor must also consider any other matters raised by the Department, NSW EPA, regulatory requirements, Project performance and industry best practice.

For any further information on this matter, please contact me on 8711 7868.

Yours sincerely



**Noelle Warwar**  
Manager Community Standards



Your ref: -  
Our ref: 12610305

20 December 2023

Mr Andrew Moore  
General Manager  
Penrith City Council  
High Street, Penrith NSW 2750

via email: [council@penrith.city](mailto:council@penrith.city)

## **Sydney Metro Western Sydney Airport (SSI-10051) SSTOM contract - Independent Environmental Audit**

Dear Andrew

GHD Pty Ltd has been engaged by Sydney Metro to undertake an independent environmental audit of the Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) stage of works delivered by Parklife Metro Consortium, in accordance with the Development Consent granted by the Department of Planning and Environment (DPE) SSI-10051. Sydney Metro, as proponent, and the SSTOM contractor have auditable obligations under the SSI-10051.

The scope of the Audit is to:

- Assess the environmental performance of the project
- Assess whether the project is complying with the requirements in the consent (including any assessment, plan or program required under these approvals) applicable to the phase of the development being audited
- Review the adequacy of strategies, plans or programs required under the consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

I am writing to you to invite comments from Penrith City Council regarding these obligations.

It would be appreciated if you could provide your comments on the performance of Sydney Metro and SSTOM contractor in meeting these obligations pertaining to:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken etc.

I also invite you to comment on the SSTOM contractors' performance with any other requirements relevant to this project, as you may deem appropriate.

The site visit for the audit is planned to occur in early February 2024. We would be available for a short teleconference, prior to the audit, in late January 2024, to discuss your feedback so that we may adequately address any concerns during the audit.

Upon receipt of this letter, please advise GHD of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by COB Friday 19 January 2024.

All correspondence in relation to this matter should be directed to Avanish Panikkar, GHD Lead Auditor on 02 9239 7667 or [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com).

Regards



**Avanish Panikkar**  
Senior Environmental Engineer, Lead Auditor  
02 9239 7667  
[avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)

**From:** [Lauren Vallejo](#)  
**To:** [Avanish Panikkar](#)  
**Subject:** Sydney Metro WSA (SSI-10051) SSTOM Contract Independent Environmental Audit  
**Date:** Monday, 8 January 2024 12:29:38 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[12610305-LET-SM WSA SSTOM IEA-Consultation-Penrith\\_City-20231220.pdf](#)  
[SSI-10051\\_Sydney Metro WSA SSTOM environmental audit.msg](#)

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You don't often get email from [lauren.vallejo@penrith.city](mailto:lauren.vallejo@penrith.city). [Learn why this is important](#)

Hi Avanish

**RE: Reference 12610305**  
**Sydney Metro Western Sydney Airport (SSI-10051) SSTOM Contract – Independent Environmental Audit**

I was forwarded the attached email and letter received at Penrith City Council regarding the Sydney Metro – WSA project (SSI-10051) Independent Environmental Audit.

As Sydney Metro Interface Lead, I am Council's primary contact for all Sydney Metro – WSA project matters.

In response to the attached letter and Independent Audit, I provide the following:  
Council continues to build and strengthen the working relationship with Sydney Metro, and Parklife Metro Joint Venture in the planning, design and delivery of the SSTOM Contract. To date, in Council's dealings with Sydney Metro and Parklife Metro on the SSTOM contract, there have been no non-compliances identified.

Parklife Metro Joint Venture, as a contractor, have demonstrated motivation to work with Penrith City Council in the planning, design and delivery of outcomes satisfactory to Council and in the best interests of the community.

For any matter relating to the project, or the Independent Environmental Audit, please feel welcome to contact myself via any of the contact details below.

Kind Regards

Lauren

**Lauren Vallejo**  
**Sydney Metro Interface Lead**  
**City Strategy**

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 **PENRITH  
CITY COUNCIL**

   Follow us

Your ref: -  
Our ref: 12610305

09 January 2024

**Kyle Browne**  
**Senior Operations Officer**  
**NSW Environment Protection Authority**

via email: [kyle.browne@epa.nsw.gov.au](mailto:kyle.browne@epa.nsw.gov.au)

## **Sydney Metro Western Sydney Airport (SSI-10051) SSTOM contract - Independent Environmental Audit**

Dear Kyle

GHD Pty Ltd has been engaged by Sydney Metro to undertake an independent environmental audit of the Western Sydney Airport Stations, Systems, Trains, Operations and Maintenance (SSTOM) stage of works delivered by Parklife Metro Consortium, in accordance with the Development Consent granted by the Department of Planning and Environment (DPE) SSI-10051. Sydney Metro, as proponent, and the SSTOM contractor have auditable obligations under the SSI-10051.

The scope of the Audit is to:

- Assess the environmental performance of the project
- Assess whether the project is complying with the requirements in the consent (including any assessment, plan or program required under these approvals) applicable to the phase of the development being audited
- Review the adequacy of strategies, plans or programs required under the consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.

I am writing to you to invite comments from NSW EPA regarding these obligations. As part of initial consultation, I will be requesting comments from Liverpool City Council and Penrith City Council. I have also requested NSW DPE to advise which other stakeholders should be consulted in relation to this audit.

It would be appreciated if you could provide your comments on the performance of Sydney Metro and SSTOM contractor in meeting these obligations pertaining to:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken etc.

I also invite you to comment on the SSTOM contractors' performance with any other requirements relevant to this project, as you may deem appropriate.

The site visit for the audit is planned to occur in early February 2024. We would be available for a short teleconference, prior to the audit, in late January 2024, to discuss your feedback so that we may adequately address any concerns during the audit.

Upon receipt of this letter, please advise GHD of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by COB Tuesday 23 January 2024.

All correspondence in relation to this matter should be directed to Avanish Panikkar, GHD Lead Auditor on 02 9239 7667 or [avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com).

Regards



**Avanish Panikkar**  
Senior Environmental Engineer, Lead Auditor  
02 9239 7667  
[avanish.panikkar@ghd.com](mailto:avanish.panikkar@ghd.com)

# **Appendix D**

**Photographs from site inspection**



## St Marys Station site



Photo 1 – St Marys station site entry from Glossop St



Photo 2 – ESCP on display at St Marys station site



Photo 3 – Community information details on display



Photo 4 – project details on display, Leithbridge St



Photo 5 – St Marys station site – generally neat and tidy



Photo 6 – St Marys historic goods shed



Photo 7 – St Marys station box excavation site

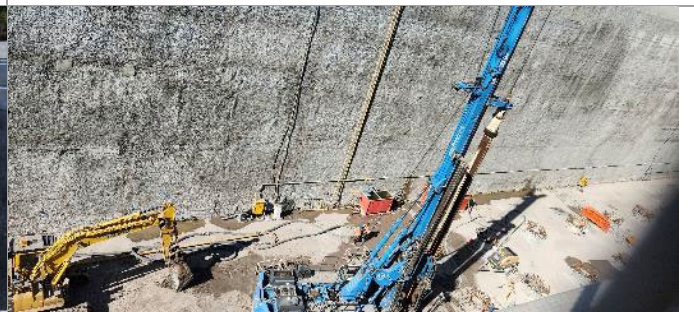


Photo 8 – top view from excavation





Photos 9-12: Erosion controls in place at drains



Photos 13-14: Spill kits available at St Marys site



Photo 15: chemical storage



Photo 16: truck wheel wash





Photos 17-18: bunded areas with stormwater ponding



Photos 19-20: stormwater and dirt build up at truck wheel wash facility



Photo 21: A few instances of unsorted waste sighted



Photo 22: waste bin area found to have dirt/dust build up



Photo 23: Random fuel container found without a bund

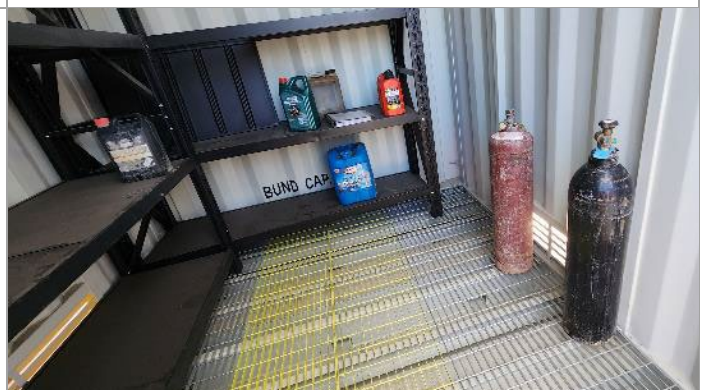


Photo 24: Self-bunded (complies with AS1940-2017) chemical storage shed did not have much material stored



Orchard Hills Station site



Photo 25: Incident processes were displayed at site



Photo 26: SSTOM site was not very active on audit day



Photo 27: spill kits



Photos 28-29: Erosion control devices in place



Photo 30: Random unconfirmed colouring on pavement (presumed to be dust control chemical)





Photo 31: Stormwater and leaked service water at site border with SBT



Photo 32: nest boxes installed by previous contractors



Photos 33-34: Localised scouring occurred due to recent heavy rains

# **Appendix E**

**Audit compliance table**

**SMC-23-0933 - SM WSA SSI10051 SSTOM Ind. Environmental Audit**

**Audit meeting:**

Lead Auditor Avnish Panikkar

Audit Team Emily Kate Marsh

Audit Review Demelza Scott



**PART A - ADMINISTRATIVE CONDITIONS**

No	Condition #	Requirement	Evidence Sighted	Independent Audit Findings and Recommendations	Compliance Status	NC unique ID
1	A1	A1 The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the:	Refer to remaining conditions in audit checklist	The SSTOM contract works is assessed to be generally in accordance with the EIS and the Submissions Report	Compliant	
	2	(a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and				
	3	(b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021.				
4	A2	A2 The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	Refer to remaining conditions in audit checklist	The works are carried out, generally, in accordance with documents listed in Condition A1 as noted in this audit findings. The procedures, commitments, preventive actions, performance criteria and mitigation measures have been incorporated into the management plans and monitoring programs endorsed by ER and approved by DPIE and have generally been implemented at the works so far.	Compliant	
5	A3	A3 In the event of an inconsistency between:			Not triggered	
	6	(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		Noted		
	7	(b) any document listed in Condition A1, the most recent document will prevail to the extent of the inconsistency.		Noted		
	8	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.		Noted		
9	A4	A4 In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.		Noted	Not triggered	
10	A5	A5 The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:			Compliant	
	11	(a) the environmental performance of the CSSI;	Audit discussion	No environmental performance related directions have been noted in this audit on SSTOM		
	12	(b) any document or correspondence in relation to the CSSI;	PLM Response to DPE comments - SSTOM AQMP Rev00 PLM Response to DPE assessment - SSTOM FFMP dated 12 Jul 2023 PLM Response to DPE assessment - SSTOM NAHMP dated 17 Jul 2023 PLM Response to DPE assessment - SSTOM SWMP dated 12 Jul 2023	Written directions from DPE with regard to specific documentation and responses have been sighted.		
	13	(c) any notification given to the Planning Secretary under the terms of this approval;	Audit discussion	No notification given to the Planning Secretary has been noted in this audit		
	14	(d) any audit of the construction or operation of the CSSI;	Audit discussion	There has been no previous audit on SSTOM under SSI-10051		
	15	(e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval);	Audit discussion	No specific written requirement or directions were noted in this audit		
	16	(f) the carrying out of any additional monitoring or mitigation measures; and	Audit discussion	No monitoring or mitigation outside the approved monitoring programs have been noted in this audit		
	17	(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.	Audit discussion	No written direction with regard to updated or revised guideline, protocol, AS or policy were noted in this audit		

18	A6	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:	Evidence sighted on conditions C5 and C15	As verified against conditions C5 and C15, the management plans and monitoring programs that require consultation with stakeholders, include details of such consultation undertaken, the responses and how these have been addressed. Various documents have a specific section with table that provides engagement log- agency, dates, discussion and how comments were addressed.	Compliant
19		(a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval;			
20		(b) a log of the dates of engagement or attempted engagement with the identified party and a summary of the issues raised by them;			
21		(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;			
22		(d) outline of the issues raised by the identified party(s) and how they have been addressed; and			
23		(e) a description of the outstanding issues raised by the identified party(s) and the reasons why they have not been addressed.			
24	A7	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.		Noted	
25	A8	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.		Noted	
26	A9	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.		Noted	
27		<b>STAGING</b>			
28	A10	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.	SMWSA Staging Report v9.0  ER endorsement letter dated 5 May 2023, from Jo Robertson, Healthy Buildings International Pty Ltd.  Letter dated 4 May 2023 from Sydney Metro submitting the Staging Report	The Rev1 of the Staging Report is dated 26 July 2021, as issued to ER. Timing of lodgement of CEMP and CEMP sub plans for the first stage of works (AEW - Advanced and Enabling Works followed by SBT and SCAW) is not verified in this audit, the scope of which pertains to SSTOM stage only, the CEMP of which was approved on 4 August 2023.	Compliant
29	A11	A11 The Staging Report must:			Compliant
30		(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;	SMWSA Staging Report v9.0	Section 3.2 of the Staging Report details staging of construction works.	
31		(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;	ER endorsement letter dated 5 May 2023, from Jo Robertson, Healthy Buildings International Pty Ltd.	Section 3 of the Staging Report details staging of the overall project and section 3.3 shows indicative timing	
32		(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;		Section 3.5 details applicability and allocation of requirements to project stages.	
33		(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging; and		Section 3.6 describes Cumulative Impacts and states no cumulative impacts are expected due to the staging of works as proposed.	

34	(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.		Section 3.5.2 refers to Construction Environmental Management Framework (CEMF) and details CEMPs, sub plans, Sustainability Management plans, other supporting documentation etc. Section 4.3.5 states that ongoing risk analysis will occur during delivery as documented in each CEMP, as required by the CEMF. Appendix I of the Staging Report includes detailed risk assessment pertaining to SSTOM.	
35	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.		Section 4 deals with Risk assessment based on Sydney Metro risk framework aligned to ISO31000:2018. The staging report has been endorsed by ER.	
36	<i>Note:</i> 1. A Staging Report may reflect the staged construction and operation of the project through geographical activities, temporal activities or activity-based staging.		Noted	
37	2. The risk matrix must reflect the stages of construction identified in the Staging Report		Noted	
38	A12 The CSSI must be staged in accordance with the Staging Report, as submitted to the Planning Secretary for information.		As per presented evidence, the project is being delivered as per the Staging Report.	Compliant
39	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.		Noted. As per evidence and findings of this audit, the project is being carried out in the SSTOM contract as per the approval conditions.	
40	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.	Post Approval form DPE Portal with Letter dated 4 May 2023 to Dominic Crinnion, A/Dir Infrastructure Management NSW DPE submitting revised Staging Report (Rev9)	Staging Report Rev9 submitted to DPIE via Major Projects portal noting the changes made. The submission has been made prior to commencement of construction of SSTOM stage of works. The revised Staging Report Rev9 and its ER endorsement are dated 5 May 2023 while its submission letter is dated 4 May 2023.	Compliant
41	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 lodgement of any CEMP or CEMP sub plan associated with the stage where change in risk assessment is proposed.	Post Approval form DPE Portal with Letter dated 4 May 2023 to Dominic Crinnion, A/Dir Infrastructure Management NSW DPE submitting revised Staging Report (Rev9); DPE approval dated 26 May 2023	Staging Report Rev9 submitted to DPIE via Major Projects portal noting the changes made. The submission is noted to be more than one month prior to commencement of construction. As per section 5.1.3, Staging Report is updated with amendment to SSTOM risk assessment included in Appendix I to reflect proposed amendments on monitoring program approvals.	Compliant
42	A16 The Proponent may submit any strategies, plans or programs required by this approval on a progressive basis, within each stage of the CSSI.		Noted	-
43	<i>Notes:</i>			
44	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		Noted	-
45	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.		Noted	-
46	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.		Noted	-
47	<b>ANCILLARY FACILITIES</b>			
48	<b>Ancillary facilities</b>			
49	A17 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:	Audit discussion, ER Reports, Site observation	No additional ancillary facilities have been established for SSTOM package works	Not triggered
50	(a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and			

51	(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			
52	(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			
53	(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.			
54	<i>Note: This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under Condition A22.</i>		Noted	
55	<b>SITE ESTABLISHMENT WORK</b>			
56	<b>Site Establishment Management Plan</b>			
57 A18	A18 Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The 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:	Audit discussion, ER Reports, Site observation, Construction Environmental Management Plan SMWSASSM-PLD-1NL-PC-PLN 000019 (Rev 01)	Ancillary facilities, including site-layouts, are detailed in the Construction Environmental Management Plan SMWSASSM-PLD-1NL-PC-PLN 000019 (Rev 01). Minor ancillary facilities have been constructed at the OHE, SMF, LDN and AEC sites in accordance with the approved CEMP, endorsed by the ER on 27 June 2023. Auditor was advised that all ancillary facilities are considered under CEMP and as such, no Site Establishment Management Plan has been required.	Not triggered
58	(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);			
59	(b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);			
60	(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;			
61	(d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to:			
62	(i) meet the performance outcomes stated in the documents listed in Condition A1; and			
63	(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and			
64	(e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required.			
65	<i>Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each ancillary facility.</i>		Noted	
66 A19	A19 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.	Audit discussion	Refer to Condition A18	Not triggered
67 A20	A20 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.	Audit discussion	Refer to Condition A18	Not triggered
68	<b>Use of Ancillary Facilities</b>			



69 A21	A21 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).	Audit discussion ER Reports CEMP and sub plans DPIE approval 4 Aug 2024 of CEMP and sub plans	CEMP and sub plans have been approved by DPIE and endorsed by ER prior to site establishment and installation of ancillary facilities.	Compliant
70	<i>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.</i>		Noted	
71	<b>Minor Ancillary Facilities</b>			
72 A22	A22 Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:			Compliant
73	(a) are located within or adjacent to the Construction Boundary; and	Site observation	The facilities have been sighted at Orchard Hills and St Marys station work sites within the construction boundaries at respective sites.	
74	(b) have been assessed by the ER to have -			
75	(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	ER reports for 12 months during 2023  Site observation	ER reports have mentioned the need for greater frequency of washdown on site and manual wheel washing supplementing automated wheel wash. Three ER monthly reports from October to December 2023 note the following in relation to St Mary's: October: photograph of wheel wash operating. November: No inspection, but erosion controls installed at STM. December: "Barriers installed to direct vehicles through the wheel wash and site compound installation" "The cracked and damaged road needs to be repaired prior to allowing trucks to exit from the site" "One complaint was reported to the ER during the period from STM about air quality and lack of TV reception. PLM onsite monitoring indicated that the dust was not from the site (noting the site is sealed concrete roads and limited gravel areas) and no dust-generating activities were occurring. It was noted by the ER that the complaint originated a distance from the site and the wind direction indicated that the dust was likely from the opposite direction, therefore this complaint is not related to Sydney Metro activities from STM works." These reports do not address the observations noted during the audit site inspection on 13 February 2024. <b>OBSERVATION:</b> Poor maintenance of ground causing collection of water near wheel wash system and buildup of sediment potentially causing dust hazard and sediment pollution at St Marys. This was noted and discussed at the audit site inspection.	OBS-A-1
76	(ii) minimal environmental impact with respect to waste management and flooding, and		No notable incidents have been raised in ER reports on waste management and flooding.	
77	(iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.		No notable incidents have been raised in ER reports on these matters on SSTOM works.	
78	<b>Boundary screening</b>			
79 A23	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.	ER reports for 12 months during 2023  Site observation	ER reports indicate review of sheds and equipment being brought to site and boundary screening progressively installed around the ancillary facilities. Site inspection (this audit) indicated that boundary screening to minimise visual impacts from construction works to adjacent land uses was in place. At one site near the stabling yard, the auditor was advised that the neighbour had verbally commented that the boundary screening was not required and can be removed if needed. The screen was in place at the time of site visit.	Compliant
80 A24	A24 Boundary screening required under Condition A23 must minimise visual impacts on adjacent sensitive land use(s).	ER reports for 12 months during 2023  Site observation		Compliant
81	<b>INDEPENDENT APPOINTMENTS</b>			

82 A25	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.	DPE letter dated 24/03/23 approving ER. DPE letter dated 19 Dec 2023 approving Independent Auditor. Government Architect NSW letter 9 March 2022 endorsement of Sydney Metro DRP Terms of Reference (ToR)	ER, IEA, Design Review Panel DPE have approved the appointment of Brett McLennan as ER on 24 March 2023. Brett is a Certified Environmental Professional. DPE has approved appointment of Independent Auditor. The approved Auditor is accredited by Exemplar Global. Design Review Panel has been approved by the Government Architect.	Compliant
83 A26	A26 The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must:	nil	Noted, this has not been triggered on SSTOM package of works.	Not triggered
84	(a) facilitate and assist the Planning Secretary in any such audit; and			
85	(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.			
86 A27	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.	nil	Noted, this has not been triggered on SSTOM package of works.	Not triggered
87	<i>Note: Conditions A26 and A27 apply to all Independent Appointments including the ER and Independent Auditor.</i>		Noted	

88	<b>ENVIRONMENT REPRESENTATIVE</b>			
89 A28	A28 Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	DPE letter dated 24/03/23	DPE letter dated 24 March 2023 confirms Brett McLennan and three other ER's as approved for the project. Commencement of works on SSTOM is 8 August 2023.	Compliant
90 A29	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.	DPE letter dated 24/03/23	DPE has approved the appointment of Brett McLennan as Independent ER on 24 March 2023 as per condition A28.	Compliant
91 A30	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.	DPE letter dated 24/03/23	DPE letter dated 24 March 2023 confirms Brett McLennan and three other ER's as approved for the project.	Compliant
92 A31	A31 The ER must meet the requirements of the Department's Environmental Representative Protocol (DPE, 2018).	DPE letter dated 24/03/23	Brett McLennan of HBI (Healthy Buildings International Pty Ltd) has been approved by DPIE as the ER for this project, which indicates the ER meets the requirements.	Compliant
93 A32	A32 For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must:			Compliant
94	(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI;		No specific communication from, or to, the Planning Secretary to, or from, the ER was sighted other than in relation to sub-conditions below. ER Reports do not specifically state <b>receiving or not receiving</b> communication from Planning Secretary. As such, it is not clear to the auditor if this subcondition has been triggered or not. <b>OBSERVATION:</b> It is recommended that the ER monthly reports clarify each sub condition in this condition A32, in addition to conforming to the ER Protocol required under condition A32(k).  Monthly ER reports for 2023	OBS-A-2
95	(b) consider and inform the Planning Secretary on matters specified in the terms of this approval;		The monthly ER reports consider matters specified in the SSI 10051 approval conditions	
96	(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;		The monthly ER reports include details of site inspections and any improvements prescribed to be undertaken.	
97	(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:	Evidence sighted on condition C4 Monthly ER reports for 2023	ER has reviewed relevant documents against conditions A10, C1, C5 and C13 as verified in this audit. Review of any other documents as required, such as DNVIS STM Rev0, OOHW Application Form - OOH General Works (June 2023) and E57 St Marys consultation report Rev00 are noted in monthly reports. Documents for Conditions A18 and A20 have not been triggered so no documents required to be reviewed.	
98	(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		ER endorsement of documents as relevant, prior to submission to DPIE sighted and verified against condition C4.	
99	(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);		ER endorsement of documents as relevant, prior to submission to DPIE and implementation on site (as reviewed in monthly reports) sighted and verified against condition C4.	
100	(iii) provide a written statement to the Planning Secretary advising the documents have been endorsed.		As verified against condition C4, ER endorsements have been provided as letter addressed to Sydney Metro. The ER monthly reports include summary of document endorsed during the reported month. The ER reports are addressed to the DPIE.	
101	(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;	Evidence sighted on condition C4.	As per dates of ER endorsement and transmittal to the Department, verified on conditions C4 and C10, no undue delay is observed.	

102	(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;	ER monthly reports 2023	The sighted ER reports for 2023 include notes regarding implementation of the documents required under this condition, except A18 and A20 which have not been triggered.	
103	(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;	ER Monthly reports 2023 Audit discussion	ER monthly reports (twelve reports during 2023) prepared by HBI (approved ER), their transmittals via Projects Portal to DPE and DPE submission receipt emails sighted. Submission has been via Major Projects portal.	
104	(h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department;	<i>Not Verified</i>	No specific evidence was sighted with regard to request from the Department for assistance in reviewing complaints received by the Department. See audit finding on condition A32(a) above.	
105	(i) consider or assess the impacts of minor ancillary facilities as required by Condition A22; and	Evidence sighted on condition A22(b)	This requirement has been assessed under condition A22(b) above.	
106	(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;	ER endorsement letters ER reports for 12 months during 2023	The ER letters of endorsement on various documents reviewed include reference to review of previous versions and amendments undertaken on the documents prior to endorsement. Summary of endorsements and review are included in ER monthly reports.	
107	(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	ER reports, submission transmittals and DPE receipt emails for 12 months during 2023	ER monthly reports (twelve reports during 2023) prepared by HBI (approved ER), their transmittals via Projects Portal to DPE and DPE submission receipt emails sighted. Submission has been via Major Projects portal, as such, no other agency was included in the submission. The ER reports sighted conform to section 2.7 "Environmental Representative Monthly Reports" of the ER Protocol (DPE, Oct 2018).	
108	(l) assess the impacts of activities as required by the Low Impact Work definition.	ER reports for 12 months during 2023	The ER reports include assessment against key construction activities including low impact works (e.g. Survey) as approved.	
109	<i>With respect to (d) above, the ER is not required to endorse the specialist content in documents requiring specialist review and / or endorsement.</i>		Noted	
110 A33	A33 The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A32 (including preparation of the ER monthly report), as well as:	ER reports, submission transmittals and DPE receipt emails for 12 months during 2023	Monthly ER reports sighted for 12 months of 2023. The auditor is satisfied that Sydney Metro and Parklife Metro have provided adequate information/documentation required by the ER to prepare the same reports as nothing to the contrary has been raised in the ER reports.	Compliant
111	(a) the Complaints Register (to be provided on a weekly basis or as requested); and			
112	(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).			

113	<b>NOTIFICATION OF COMMENCEMENT</b>			
114 A34	A34 The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	Email LCC dated 1 August 2023 Email PCC dated 1 August 2023	Email by Tim Solomon, Manager Environment Sydney Metro, informing Liverpool City Council and Penrith City Council on the SSTOM stage of SM WSA project on 8 August 2023, seven days prior to commencement of construction. Major Projects portal submission form for SSTOM Notification of Construction Commencement on 8 August 2023 - no date visible on the form. The attached Letter is written on 1 Aug 2023.	Compliant
115 A35	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.	Post approval form DPE portal dated 1 August 2023 Sydney Metro Letter dated 1 Aug 2023 to Dominic Crinnion, A/Dir Infrastructure Management DPE		Compliant
116	<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>			
117 A36	A36 Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).	Letter from DPE to Sydney Metro dated 19 December 2023	This audit is being carried out as per PAR 2020.	Compliant
118 A37	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.		Sydney Metro nomination of Wolfpeak auditors and approval thereof, sighted. This condition is Not Applicable as Sydney Metro have based the audit program off the Independent Audit Post Approval Requirements timing and no separate audit program exists.	Not triggered
119 A38	A38 Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit.		Proposed audit team has been approved by DPIE, evidence attached to the audit report.	Compliant
120 A39	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.		This is the initial audit on SSTOM package. In the letter approving the SSTOM IEA Auditor, the Planning Secretary required it to occur within a fortnight of the Independent Audit No 5 on the other stages of the project and no later than 28 February 2024.	Compliant
121 A40	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.	This audit report	Report of this audit is planned to be submitted as required by PAR 2020. Site visit was undertaken on 13 February 2024.	Not triggered
122	<b>INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING</b>			
123	<b>Incident Notification, Reporting and Response</b>			
124 A41	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.	Email from Alex McGuirk, DPHI to Chris Dickson, Sydney Metro, dated 23 February 2024	Correspondence between Alex McGuirk of DPHI and Sydney Metro noted that only incidents of material harm were required to be reported. There had been no incidents of material harm during the audit period on SSTOM package works to trigger this condition.	Not triggered
125	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.			
126 A42	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.	Audit discussion	There had been no reportable incidents to report to WaterNSW	Not triggered
127 A43	A43 Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A.	Audit discussion	There had been no reportable incidents to report on SSTOM package works	Not triggered

128	<b>Non-Compliance Notification</b>			
129 A44	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.	Environmental Incident and Non-compliance Reporting Procedure v5.1 dated 18 February 2019  Parklife Metro SSTOM Environmental NC and Incident register	The CEMP includes processes for managing incidents and incident reporting, which is consistent with the Sydney Metro Environmental Incident and Non-compliance Reporting Procedure, and Condition A44.  Two incidents occurred during the reporting period - (1) a stain on the ground from a possible spill/leak noted on 12 December 2023 and reported on the same day; (2) Out of hours delivery of a piling rig on 24 January 2024 triggering a NC with condition E57 reported on the same day.	Compliant
130 A45	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.	Sydney+Metro+Incident_E VT-0001797_20240123_1436	The SAI360 incident report template includes planning approval SSI number, site, Delivery Partner and other identifiers.	Compliant
131	<i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>		Noted	
132	<b>IDENTIFICATION OF WORKFORCE</b>			
133 A46	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.	Overarching CTMP Rev 0 dated 28 June 2023 Site observation	Section 4.6 of CTMP refers to heavy vehicle access and monitoring and requires that all heavy vehicles used for spoil haulage be clearly marked as per this condition.  Heavy vehicles were observed on local roads with project name and application number clearly marked.	Compliant
134 A47	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.	Site observation	The relevant details are displayed on the hoarding at the site entry.	Compliant

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Audit meeting:

Lead Auditor Avnish Panikkar  
 Audit Team Emily Kate Marsh  
 Audit Review Demelza Scott



PART B – COMMUNITY INFORMATION AND REPORTING

No	Condition #	Requirement	Evidence Sighted	Independent Audit Findings and Recommendations	Compliance Status	NC unique ID
1	<b>COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT</b>					
2	<b>Community Communication</b>					
	B1	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.	SM Overarching Community Communication Strategy OCCS Rev4, dated 14 December 2023	Implementation of OCCS is through establishing relationships with stakeholders and implementing engagement priorities, identification of key issues and their mitigation measures, among other things. Project (SSTOM) specific CCS and site-specific communication sub-plans have been developed to address this and are available on the Parklife Metro project website. The site-specific communication sub plans are to be reviewed to evaluate their effectiveness at six monthly interval (not due as at the time of this audit).	Compliant	
3		Should the Overarching Community Communication Strategy be updated, a copy must be provided to the Planning Secretary for information.	Post Approval submission form submitting the OCCS to Planning Secretary on 7 February 2024  DPIE Receipt of SM-WSA OCCS Rev 4 14 December 2023 as Letter from DPIE Infrastructure Management, dated 13 February 2024 to Hugh Chapman, Sydney Metro	Submission to and receipt from DPIE sighted for updated OCCS.		
4	<b>COMPLAINTS MANAGEMENT SYSTEM</b>					
5	<b>COMPLAINTS MANAGEMENT SYSTEM</b>					
6	B2	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.	<ul style="list-style-type: none"> <li>SM-WSA Monthly Complaints Report_December 2023 (All Packages)</li> <li>PLM Complaints-Privacy-Collection-Notice <a href="https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice.pdf">https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice.pdf</a></li> <li>SM Complaints Privacy Collection Notice <a href="https://www.sydneymetro.info/complaints-privacy-collection-notice">https://www.sydneymetro.info/complaints-privacy-collection-notice</a></li> </ul> <p>Sydney Metro Construction Complaints Management System ver.1 dated 15 December 2020 (to be reviewed annually)</p> <p>Email on 30 Oct 2023 from Bernice Kelly, Communications Manager SM West, advising update of CCMS.</p> <p>OCCS Rev3 2022 (3 Aug 2022)</p> <p>OCCS Rev4 2023 (14 Dec 2023)</p>	<p>The Complaints Management System has been established as part of the OCCS, which has been provided to DPE (DPE acknowledged this submission in their letter dated 10 August 2022). All managed under SM complaints system. Calls that come through directed to correct team.</p> <ul style="list-style-type: none"> <li>Construction Complaints Management System</li> <li>Weekly Complaints Register Submissions</li> <li>SM-WSA Monthly Complaints Report_December 2023</li> </ul> <p>Regular reporting to the ER occurs through the fortnightly SSTOM Environment and Approvals Working Group, including updates on complaints and the approvals.</p> <ul style="list-style-type: none"> <li>SSTOM Environment and Approvals Meeting Minutes</li> </ul> <p>An email was provided from the Senior Communications Manager, Sydney Metro to employees at Transport for NSW RE: Construction Complaints Management System update, dated 30 October 2023.</p> <p>Revisions 3 (dated 3 August 2022) and 4 (dated 14 December 2023) of the Overarching Community Communication Strategy (OCCS) were sighted.</p>	Compliant	
	B3	B3 The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction:	<a href="https://parklifemetro.com.au/contact/">https://parklifemetro.com.au/contact/</a>	Site specific communication plans have been developed and are available on Parklife Metro website, however these document do not provide contact details. Sydney Metro or Parklife Metro related enquiries contact details are given under	Compliant	
7						

8	(a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI;		the 'contact' tab of Parklife Metro website.	
9	(b) a postal address to which written complaints and enquires may be sent;			
10	(c) an email address to which electronic complaints and enquiries may be transmitted; and			
11	(d) a mediation system for complaints unable to be resolved.			
12	<i>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</i>		Noted	
B4	B4 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:	Email from Katherine Ryan SM Place Manager sighted, sent 12 February 2024	Section 6 of the Construction Complaints Management System document provides details of how to manage the Complaints Register. The auditor was advised that all complaints are recorded on the SM community engagement database. SM administers the register.	Compliant
13		SM-WSA weekly complaints reports and monthly reports (examples sighted Jan, Aug, Sept, Oct, Nov and Dec 2023)	SSTOM receives weekly update, which was sighted during the audit and includes the information required under this condition.	
14	(a) number of complaints received;			
15	(b) date and time of the complaint;			
16	(c) number of people (in the household) affected in relation to a complaint, if relevant;			
17	(d) method by which the complaint was made;			
18	(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;			
19	(f) issue of the complaint;			
20	(g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and			
21	(h) if no action was taken, the reason(s) why no action was taken.			
B5	B5 Complainants must be advised of the following information before, or as soon as practicable after, providing personal information:	SM Complaints Privacy Collection Notice Parklife Metro Complaints Privacy Collection Notice	Personal information management for complainants is covered in the Privacy Collection Notices.	Compliant
22				
23	(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;			
24	(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies;			
25	(c) the supply of personal information by the complainant is voluntary; and			
26	(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).			
27	<i>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.</i>		Noted. The Privacy Collection Notice is available on Parklife Metro website.	
B6	B6 The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Post Approval submission form submitting weekly complaints report to DPIE	Weekly complaint register reports are provided to DPIE.	Compliant
28	<i>Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.</i>		Noted. Privacy collection notice advices that details of complaints will be available to government agencies as relevant.	
29				
B7	B7 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.	OCCS Rev 4 14 Dec 2023  Audit discussion Letter from Sydney Metro to Negocio, requesting Independent appointed mediator (Negocio Resolutions) meet with the complainant	Table 1, Section 2.7 of OCCS, Roles and Responsibilities, include an independent mediation services engaged when required. Auditor was advised that the mediator has been onboarded for the project (Stephen Lancken) however yet to be required/utilised for SSTOM works.	Compliant
30				



88	B8 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.	Audit discussion Post Approval Form - SSI 10051 B9 SCAW Mediation Summary Mediation – Final Document for the property at 146D Samuel Marsden Road, Orchard Hills (dated 18/12/23) Mediation – Action items for the property at 146D Samuel Marsden Road, Orchard Hills (dated 18/12/23). Complaint Escalation and summary table, dated May 2023 Letter from Hugh Chapman, SM, to Dominic Crinnion, DPE (19 Dec 2023) SSI 10051 B9 SCAW Mediation Summary; Email from Department of Planning and Environment acknowledging receipt of SSI 10051 B9 SCAW Mediation Summary on 19 December 2023. Letter from Sydney Metro to Negocio, requesting Independent appointed mediator (Negocio Resolutions) meet with the complainant (16/12/2023)	As per response to condition B7 the mediator has been onboarded. The role of the mediator is to resolve a complaint as required. No complaints related to SSTOM package works have used the services of the mediator to-date. A community complaints mediator was engaged on 16 June 2023 to mediate between Sydney Metro and a resident of Orchard Hills (Steve Lancken of Negocio Resolutions). The mediation was concluded in December 2023. As per the complaint escalation summary table, the works refer to SBT and SCAW contracts.  <b>Observation:</b> Accreditation details as per National Mediator Accreditation System accreditation details were not available to verify in this audit.	Not triggered	OBS-B-1
31					
32	B9 The Community Complaints Mediator will:	OCCS Rev 4 14 Dec 2023	Role of the Complaints mediator is described in the OCCS Table 1	Compliant	
(a)	(a) review any unresolved disputes, referred by the ER in accordance with the Overarching Community Communication Strategy;				
33	(b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and				
34	(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.				
35					
B10	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.	Construction Complaints Management System, V1, dt 15 Dec 2020	Complaints escalation process and the role of the independent mediator are described in section 5 of the Construction Complaints Management System document sighted.	Compliant	
36					
37	<b>PROVISION OF ELECTRONIC INFORMATION</b>				
B11	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 href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a>  <a href="https://www.sydneymetro.info/westernsydneyair/portline">https://www.sydneymetro.info/westernsydneyair/portline</a>  Audit discussions	Sydney Metro and Parklife Metro maintain separate project websites with contact details. The SM website had been in place during previous contract (SBT and SCAW) and therefore definitely well prior to commencement of the SSTOM package of works.	Compliant	
38	(a) information on the current implementation status of the CSSI;		The SM website provides construction updates and details of the CSSI works, documentation required under Condition A1 including CEMPs, communication strategies and reports, sustainability documents etc.		
39	(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;				
40	(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;		The SSI approval document is available via a link		
41					

(d)	(d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website;	Copy of EPL is available on the website. The auditor is not aware of any other statutory approval, licence of permit applicable to SSTOM works. It is noted that the ER Endorsement of Groundwater Monitoring Program Rev 0.0 of 11 July 2023 referred to discussions on obtaining a Water Access Licence. The auditor was advised that Sydney Metro is assessing if obtaining a WAL is required.
42	(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	Documents required by this approval are accessible via the website including CEMPs, NDVIS, EPL monitoring reports, sustainability documents, community management plans and consultation records, privacy collection notice, various CTMPs etc.
43	(f) a copy of the audit reports required under this approval.	There aren't any audit reports published as this is the first audit under this approval on SSTOM contract.
44	<i>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.</i>	Noted. Date of publishing of information has not been verified in this audit, however the relevant information/document were published on the website at the time of audit.
45	<i>All information required in this condition is to be provided on the website or webpage, and easy to navigate.</i>	Noted. The project website is easy to navigate and find available information.
46		

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**Audit meeting:**

Lead Auditor    Avnish Panikkar  
 Audit Team     Emily Kate Marsh  
 Audit Review    Demelza Scott



**PART C - CONSTRUCTION ENVIRONMENTAL MANAGEMENT**

No	Condition #	Requirement	Evidence Sighted	Independent Audit Findings and Recommendations	Compliance Status	NC unique ID
1		<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b>				
2	C1	C1 Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	1. Construction Environmental Management Plan (CEMP) SSI-10051-PA-259 Rev 01, 19 July 2023 2. Flora and Fauna Management Sub-plan (FFMP) SSI-10051-PA-252 Rev 01, 19 July 2023 3. Noise and Vibration Management Sub-plan (NVMP) SSI-10051-PA-257 Rev 02, 1 August 2023 4. Soil and Water Management Sub-plan (SWMP) SSI-10051-PA-256 Rev 01, 17 July 2023 5. Non-Aboriginal Heritage Management Sub-plan (NAHMP) SSI-10051-PA-253 Rev 01, 17 July 2023 6. Noise and Vibration Monitoring Program (NVMonProg) SSI-10051-PA-257 Rev 01, 19 July 2023 7. Surface Water Monitoring Program (SWMonProg) SSI-10051-PA-256 Rev 01, 17 July 2023 8. Air Quality Monitoring Program (AQMonProg) SSI-10051-PA-260 Rev 01, 20 July 2023 9. Air Quality Management Sub-plan (AQMP) SSI-10051-PA-260 Rev 01, 20 July 2023 10. Groundwater Monitoring Program (GMonProg) SSI-10051-PA-269 Rev 00, 7 July 2023	Copy of CEMP and various subplans are available on Parklife Metro project website. Each subplan has specific section Project Requirements with compliance table, noting how the document addresses the CEMF and other requirements.	Compliant	
3	C2	C2 With the exception of any CEMPs expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMPs must be submitted to the Planning Secretary for approval.	Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i> , signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.	The DPIE approval pertains to CEMP, FFMP, NVMP, SWMP, NAHMP, Noise and Vibration Monitoring Program, Surface Water Monitoring Program and Air Quality Monitoring Program. The Documents submitted for Information - Air Quality Management Sub-plan and Groundwater Monitoring Program have been acknowledged.	Compliant	
4		<i>Note: The Planning Secretary will consider the assessment of the predicted level of environmental risk and potential level of community concern required under Condition A11(e) when deciding whether any CEMP's may be endorsed by the ER.</i>		Noted		

5 C3	<p>C3 The CEMP(s) not requiring the Planning Secretary's approval must be submitted to the ER for endorsement no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage. That CEMP must obtain the endorsement of the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.</p>	<p>ER endorsement of GWMP Rev0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 11 Jul 2023.</p> <p>ER endorsement of AQMP Rev0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 27 Jun 2023.</p> <p>ER endorsement of SWMP Rev0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 26 Jun 2023.</p> <p>ER Endorsement of Surface Water Quality Construction Monitoring Program Rev 0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 28 Jun 2023.</p>	<p>The documents required by CEMF and not requiring DPIE approval - Groundwater Monitoring Program and AQMP have been endorsed by the ER.</p>	Compliant
6 C4	<p>C4 Any CEMP to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.</p>	<p>Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i>, signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.</p> <p>ER endorsement letters:</p> <ul style="list-style-type: none"> <li>•ER Endorsement of GWMP Rev 0.0</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000001.00.S2.00.01_NAHMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000002.00.S2.00.01_FFMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000003.00.S2.00.01_AQMonProg</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000004.00.S2.00.01_AQMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000005.00.S2.00.01_CEMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000006.00.S2.00.01_NVMon.Prog.</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000007.00.S2.00.01_NVMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000008.00.S2.00.01_SWMP</li> <li>•SMWSASSM-HBI-1NL-EN-CER-000009.00.S2.00.01_SWQMMonProg</li> </ul>	<p>ER endorsement of AQMP, SWMP, GWMP, SWQCMP, CEMP, FFMP, NVMP, NAHMP etc sighted.</p>	Compliant

7	C5	C5 Of the CEMP Sub-plans required under Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why.	Flora and Fauna Management Sub-plan (FFMP) Rev 01, 19 July 2023 Noise and Vibration Management Sub-plan (NVMP) Rev 02, 1 August 2023 Soil and Water Management Sub-plan (SWMP) Rev 01, 17 July 2023 Non-Aboriginal Heritage Management Sub-plan (NAHMP) Rev 01, 17 July 2023  Correspondence from Keirron Anderson, Parklife Metro, to Stella Qu at Liverpool City Council on 5 April 2023 requesting feedback on NAHMP FFMP and AQMP  Document transmittal from Keirron Anderson, Parklife Metro, to Stella Qu, Liverpool City Council on 20 March 2023, Liverpool Council requesting feedback on NVMP and SWMP  Document transmittal from Keirron Anderson, Parklife Metro, to Lauren Velljo, Penrith Council on 29 March 2023, requesting feedback on NVMP and SWMP  Document transmittal from Keirron Anderson, Parklife Metro, to Lauren Velljo, Penrith Council on 15 March 2023, requesting feedback on NAHMP FFMP and AQMonP	Table 5 in the CEMP summarises CEMP and all sub-plans and what agency consultation / endorsement / approval are required for each document.  Document transmittal to Liverpool and Penrith City Councils requesting feedback sighted.  NVMP - Table 6 summarises consultation with councils and WaterNSW, dates and discussion and how comments were addressed.  FFMP - Section 3.6 Table 5 provides consultation log, with agency, dates and discussion and how comments were addressed.  SWMP - Section 3.5 Table 5 Consultation log includes agency, dates, discussion and how comments were addressed.  NAHMP - Section 3.4, table 5 provides engagement log, agency, dates, discussion and how comments were addressed.	Compliant															
8		<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>		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			
	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																		
9		<i>Note: CEMP Sub-plan(s) may reflect the construction of the project through geographical activities, temporal activities or activity based staging.</i>		Noted																
10	C6	C6 The CEMP Sub-plans must state how:	1. Flora and Fauna Management Sub-plan (FFMP) Rev 01, 19 July 2023	Each sub-plan contains a section addressing Project Requirements, providing a compliance table that lists the requirements and where in the plan they have been addressed. The sections referenced have been checked in this audit.	Compliant															
11	(a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved;	2. Noise and Vibration Management Sub-plan (NVMP) Rev 02, 1 August 2023																		
12	(b) the mitigation measures identified in the documents listed in Condition A1 will be implemented;	3. Soil and Water Management Sub-plan (SWMP) Rev 01, 17 July 2023																		
13	(c) the relevant terms of this approval will be complied with; and	4. Non-Aboriginal Heritage Management Sub-plan (NAHMP) Rev 01, 17 July 2023																		
14	(d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	5. Surface Water Monitoring Program (SWMonProg) Rev 01, 17 July 2023 6. Air Quality Management Sub-plan (AQMP) Rev 01, 20 July 2023																		
15	C7	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.	Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i> , signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.	The DPIE approval pertains to CEMP, FFMP, NVMP, SWMP, NAHMP, Noise and Vibration Monitoring Program, Surface Water Monitoring Program and Air Quality Monitoring Program. The Documents submitted for Information - Air Quality Management Sub-plan and Groundwater Monitoring Program have been acknowledged.	Compliant															

16	C8	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1. Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	ER endorsement of GWMP Rev0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 11 Jul 2023.  ER endorsement of AQMP Rev0.0 - letter from Brett McLennan, Healthy Buildings International Pty Ltd (ER) dated 27 Jun 2023.	The documents required by CEMF and not requiring DPIE approval - Groundwater Monitoring Program and AQMP have been endorsed by the ER.	Compliant
17	C9	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.	Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i> , signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.	As per the DPIE approval letter, all sub plans and CEMP and the monitoring programs were submitted together in compliance with Condition C9.	Compliant
18	C10	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.	Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i> , signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.	As per sighted information, the timeline for CEMP and sub plans being submitted and approved is: 1 August - notification 4 August - CEMP approval 8 August - construction commenced	Compliant
19	C11	C11 In addition to the relevant requirements of the CEMF, the Flora and Fauna CEMP Sub-plan must include but not be limited to:			Compliant
20		(a) details of how the requirements of Conditions E11 will be met;		Appendix A of FFMP states that condition E11 is not directly relevant to SSTOM as per the Staging Report. However the process to remove hollow-bearing or habitat trees would follow a Nest Box strategy to be developed as required.	
21		(b) details of a dewatering plan of farm dams including:			
22		(i) supervision of dewatering by a suitably qualified ecologist;		Section 3.2 Compliance table confirms that this condition is not applicable to SSTOM package, as farm dams were dewatered by previous contracts (SBT/SCAW).	
23		(ii) a methodology for the transfer of native fauna species known to inhabit and/or use the dam;	Flora and Fauna Management Sub-plan (FFMP) Rev 01, 19 July 2023		
24		(iii) the location and suitability of the proposed relocation sites; and			
25		(iv) any potential impacts of relocating the fauna to the relocation sites;			
26		(c) protocols for incidental finds of threatened species and ecological communities within the construction boundary.		Section 6.6 of FFMP Unexpected Flora and Fauna Finds refers to comprehensive survey undertaken during EIS and the process to record and report any unexpected flora and fauna finds by the project ecologist to Sydney Metro and the ER. Appendices C and D provides more detailed procedures for clearing/grubbing and fauna handling.	

27	C12	C12 In addition to the relevant requirements of the CEMF, the Soil and Water CEMP Sub-Plan must include but not be limited to:			Compliant
28		(a) details how the requirements of Conditions E127, E128 and E129 will be met; and	Soil and Water Management Sub-plan (Rev 01)  Contamination and Asbestos Unexpected Finds Procedure (Rev D) dt 9/6/2023	Appendix A of SWMP provides where in the plan conditions E127-128-129 are addressed. E127: Section 6.5 of SWMP provides processes to follow when works in waterways and temporary waterway crossings would be required. Section 6.7 refers to stockpile management processes and relevant guidelines.  E128: Section 6.1.1 of SWMP provides Erosion and Sediment Control plan processes and the hierarchy of controls. Section 6.1.2 details the ESC Strategy. Section 6.11 further details the management controls to minimise potential water quality impacts and contamination.  E129: SWMP section 6.3 provides Water Treatment and discharge criteria/targets and section 6.12 details surface water monitoring with Surface Water Quality Monitoring Program (endorsed by ER and approved by DPIE) in Appendix B.	
29		(b) the unexpected contaminated finds protocol required by Condition E98.		The procedure has been prepared as required, and included as appendix C in the Soil and Water Management Sub-plan.	
30		<b>CONSTRUCTION MONITORING PROGRAMS</b>			
31	C13	C13 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.	Noise and Vibration Management Sub-plan (NVMP) Rev 02, 1 August 2023  Soil and Water Management Sub-plan (SWMP) Rev 01, 17 July 2023  Groundwater Monitoring Program Rev A dt 11 May 2023 (initial draft)  Letter dated 24 May 2023 to Dominic Crinnion, DPIE submitting Groundwater Monitoring Program for consultation with DPE Water  Correspondence from Keirron Anderson, Parklife Metro, to Stella Qu at Liverpool City Council on 5 April 2023 requesting feedback on NAHMP FFMP and AQMP  Document transmittal from Keirron Anderson.	The required monitoring programs have been prepared. The Noise and Vibration Monitoring Program is contained within Noise and Vibration Management Plan (Appendix B) - ER endorsement is noted as letter dated 28 June 2023 from HBI. Section 3 of the Monitoring Program details agency consultation log including agency, dates, discussion and how comments have been addressed.  Surface Water Quality Monitoring Program is contained within Soil and Water Management Plan (Appendix B) - Section 3 of the Monitoring Program details agency consultation log including agency, dates, discussion and how comments have been addressed.  Air Quality Monitoring Program has been prepared in consultation with Councils.	Compliant

Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program
(a) Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)
(b) Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils
(c) Groundwater	DPIE Water
(d) Air Quality	Relevant Councils

Document transmittal from Keirron Anderson, Parklife Metro, to Stella Qu, Liverpool City Council on 20 March 2023, Liverpool Council requesting feedback on NVMP and SWMP

Document transmittal from Keirron Anderson, Parklife Metro, to Lauren Velljo, Penrith Council on 29 March 2023, requesting feedback on NVMP and SWMP

Document transmittal from Keirron Anderson, Parklife Metro, to Lauren Velljo, Penrith Council on 15 March 2023, requesting feedback on NAHMP FFMP and AQMonP

Groundwater Monitoring Program has been prepared and endorsed by HBI (ER). Evidence of submission to DPE Water for consultation sighted. The early draft sighted in the audit did not yet have the agency consultation responses noted.

ER Endorsement of GWMP on 11 July 2023 referred to a commitment to update this plan within one month of the transfer of this obligation from the Station Box and Tunnelling (SBT) package of works to STTOM to ensure that the ongoing monitoring reflects the most recent monitoring data, and where necessary update the Groundwater Model prepared by SBT under Condition E134, and the GWMP. The auditor was advised that SSTOM will take over the groundwater monitoring component in the following audit period.

33	C14	Each Construction Monitoring Program must provide:	Noise and Vibration Monitoring Program, as Appendix B of Noise and Vibration Management Sub-plan (NVMP) Rev 0	Section 1.3 Conditions of Approval and Table 1 of the NVMonP list how these requirements have been addressed in the document. The referenced sections have been checked in this audit.	Compliant
34		(a) details of baseline data available including the period of baseline monitoring;	Surface Water Quality Monitoring Program as Appendix B of Soil and Water Management Plan Rev 01		
35		(b) details of baseline data to be obtained and when;			
36		(c) details of all monitoring of the project to be undertaken;			
37		(d) the parameters of the project to be monitored;			
38		(e) the frequency of monitoring to be undertaken;	Groundwater Monitoring Program Rev A dt 11 May 2023	Section 1.3.1 Conditions of Approval, and Table 1 of the Groundwater Monitoring Program detail how these conditions have been addressed. The referenced sections have been checked in this audit.	
39		(f) the location of monitoring;			
40		(g) the reporting of monitoring results and analysis results against relevant criteria;	Air Quality Monitoring Program Rev0.0, as Appendix B of Air Quality Management Plan, Rev01	Section 2.2 Project Requirements and Table 1 of the Air Quality Monitoring Program refer how these conditions are met. The referenced sections have been checked in this audit.	
41		(h) details of the methods that will be used to analyse the monitoring data;			
42		(i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts;			
43		(j) a consideration of SMART principles;			
44		(k) any consultation to be undertaken in relation to the monitoring programs; and		Section 1.4 Conditions of Approval, and Table 1 of the Surface Water Quality Monitoring Program list how these conditions have been addressed. The referenced sections have been checked in this audit.	
45		(l) any specific requirements as required by Conditions C15 to C16.			
46	C15	The Noise and Vibration Construction Monitoring Program must include:	Noise and Vibration Monitoring Program, as Appendix B of Noise and Vibration Management Sub-plan (NVMP) Rev 0	Section 1.3 Conditions of Approval and Table 1 of the NVMonP list how these requirements have been addressed in the document. The referenced sections and DNVIS have been checked in this audit. Section 5 of the NVMonP details the noise and vibration monitoring procedures and section 6.3 details Reporting.	Compliant
47		(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;	Detailed Noise and Vibration Impact Statement (DNVIS)		
48		(b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken;			
49		(c) method and frequency for reporting monitoring results; and			
50		(d) a process to undertake real time noise and vibration monitoring.			
51		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.			



52 C16	C16 Groundwater Construction Monitoring Program must include:	Groundwater Monitoring Program Rev A dt 11 May 2023	The Groundwater Monitoring Program has been prepared and has been endorsed by the ER and is included in the SWMP. Section 1.3.1 Conditions of Approval, and Table 1 of the Groundwater Monitoring Program detail how these conditions have been addressed. These references have been checked in this audit.	Compliant
53	(a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1;			
54	(b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality;			
55	(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;			
56	(d) results from existing monitoring bores;			
57	(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;			
58	(f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users;			
59	(g) daily measurement of the amount of water discharged from the water treatment plants;			
60	(h) water quality testing of the water discharged from treatment plants;			
61	(i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems;			
62	(j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source;			
63	(k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and			
64	(l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.			
65 C17	C17 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.	Letter with Subject: <i>Sydney Metro, Western Sydney Airport, SSTOM, Construction Environmental Management Plan, sub-plans and monitoring programs</i> , signed by Dominic Crinnion, Director Infrastructure Management DPIE, on 4 August 2023, addressed to Hugh Chapman, Director Environment Sustainability and Planning Sydney Metro.	All monitoring programs have been submitted to the Planning Secretary for approval.	Compliant
66 C18	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.	Letter ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, dated 28 June 2023, signed by Brett McLennan, HBI  Letter ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0 dated 28 June 2023, signed by Brett McLennan, HBI  Letter ER Endorsement of Ground water Monitoring Program Rev 0.0 dated 11 July 2023, signed by Brett McLennan, HBI	The construction Monitoring Programs requiring ER endorsement have been submitted to ER and obtained endorsement.	Compliant

67 C19	C19 Any of the Construction Monitoring Programs which require Planning Secretary approval must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	Sydney Metro letter dated 11 July 23 submitting ER endorsed GWMP to DPIE  Sydney Metro letter dated 28 June 23 submitting ER endorsed NV monitoring program to DPIE	The letters of submission of monitoring programs to DPIE indicate more than one month gap before construction commencement on 8 August 2023.	Compliant
68 C20	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.	Letter DPIE Approval signed by Dominic Crinnion on 4 Aug 2023  Baseline Noise Measurement Plan ver.A dated 24 Feb 2023  Ground water Monitoring Program Rev A  Air Quality Construction Monitoring Program Rev 0.0  Soil and Water Management Plan, Rev 00	All approvals were obtained as of 4 August 2023 and construction commenced 8 August 2023. Baseline Air quality data is included in the AQMP (section 3 of AQ Monitoring Program) that was approved prior to construction commencement. Baseline Noise data is included in Baseline Noise Measurement Plan ver.A dated 24 February 2023 as per Particular Specification (PS) 06 Clause 6.5.2(c) Baseline groundwater data is included in the GWMP RevA (as sighted) Baseline (historical) surface water quality data is included in Section 4 of the Surface Water Quality Monitoring Program, Appendix B of the Soil and Water Management Plan Rev00.	Compliant
69 C21	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.	EPL monitoring reports are available on Parklife Metro website.  Three monitoring reports were sighted: Biannual Groundwater Monitoring Report (July 2023 to November 2023) Noise and Vibration Monitoring Report (May 2023 - October 2023) Surface Water Monitoring Report (May 2023 - October 2023)	Evidence of implementation, reporting as per each monitoring program's reporting schedule sighted for three out of four of the construction monitoring programs. The air quality report is not yet due.	Compliant
70 C22	C22 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.	Letter to NSW Department of Planning and Environment: SBT Bi-annual Monitoring Report (Groundwater) 29 Jan 2024 Letter to NSW Department of Planning and Environment: SBT 6-Monthly Monitoring Reports (Surface Water and Noise & Vibration) 11 Dec 2023	Evidence of submitting the reports of results of all construction monitoring programs by SBT sighted. The auditor was advised that no monitoring reports were due for submission for SSTOM as at the time of this audit.	Not triggered
71	<i>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</i>		Noted	

**SMC-23-0933 - SM WSA SSI10051 SSTOM Ind. Environmental Audit**

**Audit meeting:**

Lead Auditor    Avnish Panikkar  
 Audit Team     Emily Kate Marsh  
 Audit Review    Demelza Scott



**PART D - OPERATIONAL ENVIRONMENTAL MANAGEMENT**

No	Condition #	Requirement	Evidence Sighted	Independent Audit Findings and Recommendations	Compliance Status	NC unique ID												
1	<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT</b>																	
	2	D1	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.		SSTOM package works are in construction, operational conditions as per Part D have not been triggered.	Not triggered												
	3	D2	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:			Not triggered												
	4	(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;				Not triggered												
	5	(b) issues identified through ongoing risk analysis can be managed; and				Not triggered												
	6	(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 triggered												
	7	D3	Where an OEMP is required, the Proponent must include the following OEMP Sub-plans in the OEMP:			Not triggered												
	8		<table border="1"> <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> <tr> <td>(c)</td> <td>Flood Emergency Management Plan</td> <td>EES Group, DPIE Water, SES and Relevant Council(s)</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	(c)	Flood Emergency Management Plan	EES Group, DPIE Water, SES and Relevant Council(s)			Not triggered
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(b)	Bushfire Management Plan	NSW Rural Fire Service																
(c)	Flood Emergency Management Plan	EES Group, DPIE Water, SES and Relevant Council(s)																

9 D4	D4 Each of the OEMP Sub-plans must include the information set out in Condition D2 of this approval.	Not triggered
10 D5	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 triggered
11 D6	D6 The OEMP Sub-plans must be submitted to the Planning Secretary as part of the OEMP.	Not triggered
12 D7	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 triggered
13 D8	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 triggered

**SMC-23-0933 - SM WSA SSI10051 SSTOM Ind. Environmental Audit**

**Audit meeting:**

Lead Auditor Avanish Panikkar

Audit Team Emily Kate Marsh

Audit Review Demelza Scott



**PART E - KEY ISSUE CONDITIONS**

No	Condition #	Requirement	Evidence Sighted	Independent Audit Findings and Recommendations	Compliance Status	NC unique ID
1		<b>AIR QUALITY</b>				
2	E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	<p>Site observation and photos</p> <p>SSTOM Air Quality Monitoring Program Rev00 dated 27 June 2023 (copy for ER endorsement and DPE approval)</p> <p>SSI-10051 IEA No 4 by Wolfpeak, September 2023</p>	<p>The site was observed to be generally neat without dust and other air pollutant emissions at the time of the audit. The site air quality controls have been implemented by SBT and SCAW contracts prior to handover to SSTOM, as deemed compliant by Wolfpeak (previous audit). The SSTOM AQMP includes proactive and reactive control measures for dust management. Real time particulate matter monitoring have been implemented and visual monitoring undertaken at various construction sites. No AQ monitoring data/reports were verified in this audit.</p>	Compliant	
3		<b>BIODIVERSITY AND TREES</b>				
4		<b>Biodiversity Credits</b>				
5	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.	<p>Audit discussion, site observation</p> <p>SSI-10051 IEA No 4 by Wolfpeak, September 2023</p>	<p>The clearing of trees for the corridor was undertaken by SCAW prior to the SSTOM works commencing. During the clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. As per the Audit4 finding (Wolfpeak), <i>the only clearing conducted on SBT sites during the audit period has been at Orchard Hills to facilitate SSTOM. This has been minimal. The clearing process is consistent with the approved FFMP.</i></p> <p>No clearing or re-use of native vegetation has occurred during the audit period under the SSTOM package.</p>	Not triggered	

6	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.	Audit discussion, site observation  Flora and Fauna Management Plan, Rev00 dated 15 June 2023	No clearing of the plant community types identified have occurred in SSTOM package scope areas during the audit period. Section 6.2 of the FFMP states: <i>Sites will be handed over to Parklife Metro D&amp;C generally cleared and stabilised with all major earthworks completed and for this reason SSTOM Works have limited potential to impact biodiversity. However until detailed design is further progressed, and the full extent of clearing is completed by prior Works contractors, Parklife Metro D&amp;C is unable to confirm if any areas will require clearing as part of SSTOM Works.</i>	Not triggered
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7	E4	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.	Audit discussion, site observation	No clearing of the plant community types identified have occurred in SSTOM package scope areas during the audit period. As per previous audit finding on SBT and SCAW, ecosystem credits have been retired prior to impact during previous construction activities.	Not triggered
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**Table 3: Ecosystem credits**

Plant Community Type (PCT) ID and name	Number of Credits
724: Broad-leaved Ironbark – Grey Box – Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion	246
835: Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	217
849: Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	204
1800: Swamp Oak open forest on riverflats of Cumberland Plain and Hunter Valley	181
<b>TOTAL</b>	<b>848</b>

**Table 4: Species credits required**

Species	Number of Credits
<i>Acacia bynoeana</i> (Bynoe's Wattle)	31
<i>Acacia pubescens</i> (Downy Wattle)	54
<i>Allocasuarina glareicola</i>	47
<i>Cynanchum elegans</i> (White-flowered Wax Plant)	18
<i>Dillwynia tenuifolia</i>	72
<i>Grevillea juniperina</i> subsp. <i>juniperina</i> (Juniper-leaved Grevillea)	153

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<i>Grevillea parviflora</i> subsp. <i>parviflora</i> (Small-flower Grevillea)	32
<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i> (Endangered population <i>Marsdenia viridiflora</i> R. Br. subsp. <i>viridiflora</i> )	137
<i>Micromyrtus minutiflora</i>	47
<i>Pimelia curvilora</i> var. <i>curvilora</i>	18
<i>Pimelia spicata</i> (Spiked Rice-flower)	22
<i>Pultenaea parviflora</i>	31
<i>Meridolum comeovirens</i> Cumberland Plain Land Snail	159
<i>Myotis Macropus</i> (Southern Myotis)	292
<b>TOTAL SPECIES CREDITS</b>	<b>1,113</b>

Note: Credits have been calculated using the Biodiversity Assessment Method.

10	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.	Audit discussion, site observation Flora and Fauna Management Plan, Rev00 dated 15 June 2023	No clearing of the plant community types identified have occurred in SSTOM package scope areas during the audit period. Section 4 of the FFMP refers to BDAR, EIS and Submissions report. The existing environment has been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired.	Not triggered
11	E6	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules 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)	Audit discussion, site observation Flora and Fauna Management Plan, Rev00 dated 15 June 2023	The existing environment has been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired.	Not triggered
12	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.	Audit discussion, site observation Flora and Fauna Management Plan, Rev00 dt 15 Jun 2023	The existing environment has been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired.	Not triggered
13	<b>Key Fish Habitat</b>				
14	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.	PUDCLP - LDN and SMF (Rev 0)_FINAL for IC	The Stage 1 SSTOM Place, Urban Design and Corridor Landscape Plan (PUDCLP) refers to SCAW PUDCLP for requirements and design of fauna crossings which states that fauna crossing proposals will be reviewed with DPIE EES, DPI Fisheries. The requirement to consult with these stakeholders has not been triggered to date under the SSTOM package.	Not triggered
15	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.	PUDCLP - LDN and SMF (Rev 0)_FINAL for IC	As per condition E8 review, this condition has not been triggered for SSTOM during this audit period.	Not triggered
16	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.	PUDCLP - LDN and SMF (Rev 0)_FINAL for IC	As per condition E8 review, this condition has not been triggered for SSTOM during this audit period.	Not triggered

17		<b>Nest Boxes</b>			
18	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.	Site observation	Appendix A of FFMP states that condition E11 is not directly relevant to SSTOM as per the Staging Report. However the process to remove hollow-bearing or habitat tree would follow a Nest Box strategy to be developed as required. Nest boxes were found to have been installed on existing trees near the Orchard Hills Station site. It is noted that this specific site had only recently been handed over to SSTOM. No existing trees with hollows have been required to be removed for SSTOM during audit period.	Not triggered
19		<b>Re-use of Timber</b>			
20	E12	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: (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 (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.	Audit discussion, site observation	There has been no vegetation clearing during the SSTOM package works during the audit period.	Not triggered
21	E13	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.	Audit discussion, site observation Stage 1 PUDCLP ver0, Nov2023	There has been no revegetation required during the SSTOM package works to-date and no tree survey has been undertaken. As per Stage 1 PUDCLP section 1.6, <i>the clearing of trees for the corridor was undertaken by SCAW prior to the SSTOM works commencing.</i> Section 1.5.2 states, <i>The provision of replacement trees is a key outcome of the project. New tree planting is to be at a ratio of 2:1, except trees that are offset under Condition E4 (biodiversity credits). This requirement will be addressed in the Corridor Landscape Master Plan in the future Stage 2 SSTOM PUDCLP.</i>	Not triggered
22		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).			



23		<i>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.</i>		Noted	
24		<b>Watercourse Crossings</b>			
25	E14	The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives:	PUDCLP - LDN and SMF (Rev 0)_FINAL for IC	The Stage 1 SSTOM PUDCLP refers to SCAW PUDCLP for requirements and design of fauna crossings which states that fauna crossing proposals will be reviewed with DPIE EES, DPI Fisheries. The requirement to consult with these stakeholders has not occurred for design, due to commence shortly but date not confirmed. Sections 1.5 and 1.6 of SSTOM Stage 1 PUDCLP states <i>This requirement is not applicable to the scope of this Stage 1 SSTOM PUDCLP as it only applies to the design of the rail corridor, and does not apply to the Luddenham Station building or the Stabling and Maintenance Facility which Stage 1 PUDCLP addressed.</i>	Not triggered
26		(a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures,	Audit discussion (Sydney Metro, Parklife Metro)		
27		(i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function;			
28		(ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest;			
29		(iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and			
30		(iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth;			
31		(b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna,			
32		(i) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna;			
33		(ii) maximise light penetration into the culvert structures;			
34		(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;			
35		(c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and			
36		(d) details of remnant native vegetation including riparian vegetation.			
37		The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition.			
38		<i>Note: These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.</i>		Noted	
39		<b>FLOODING</b>			

40	E15	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.	Flood Modelling Report Design Stage 1 Rev A 6 July 2023  Soil and Water Management Sub-plan SMWSASSM-PLD-1NL-PC-PLN-000020 (Rev 01)	Flooding is considered with regard to this requirement during design and construction. The requirements of this condition relating to design will be addressed in the Design Reports and noted in the approved Soil and Water Management Sub-plan. Example of report showing compliance with flood modelling parameters being met by design has been sighted. As per the flood modelling report, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report.	Compliant																												
41		<p>Table 5: Flood Impact Criteria</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Location</th> <th>Criteria</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Afflux</td> <td rowspan="2">Land zoned as residential, industrial or commercial, and critical infrastructure</td> <td>Maximum 10 mm to buildings that are flood prone in existing conditions</td> </tr> <tr> <td>No new above floor flooding</td> </tr> <tr> <td>Roads</td> <td>Maximum 50 mm where flooding is below floor level</td> </tr> <tr> <td rowspan="2">Roads</td> <td rowspan="2">Land zoned as rural, primary production, environment or public recreation</td> <td>Maximum 50 mm</td> </tr> <tr> <td>Maximum 100 mm</td> </tr> <tr> <td>Velocity</td> <td>All areas</td> <td>Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent.</td> </tr> <tr> <td rowspan="2">Flood hazard</td> <td>Residential and commercial land</td> <td>No increase in the flood hazard or risk to life.</td> </tr> <tr> <td>Roads</td> <td>No increase in the flood hazard or risk to life.</td> </tr> <tr> <td rowspan="3">Flood duration</td> <td>Residential and commercial buildings</td> <td>No increase to duration of above floor flooding.</td> </tr> <tr> <td>Roads</td> <td>No more than one hour increase.</td> </tr> <tr> <td>Crown land, open space, farming, grazing and cropping land</td> <td>No more than one hour increase.</td> </tr> </tbody> </table>	Parameter	Location	Criteria	Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions	No new above floor flooding	Roads	Maximum 50 mm where flooding is below floor level	Roads	Land zoned as rural, primary production, environment or public recreation	Maximum 50 mm	Maximum 100 mm	Velocity	All areas	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent.	Flood hazard	Residential and commercial land	No increase in the flood hazard or risk to life.	Roads	No increase in the flood hazard or risk to life.	Flood duration	Residential and commercial buildings	No increase to duration of above floor flooding.	Roads	No more than one hour increase.	Crown land, open space, farming, grazing and cropping land	No more than one hour increase.			
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42		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.																															
43	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.	Flood Modelling Report Design Stage 1 Rev A 6 July 2023	As per the flood modelling report, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report as design is finalised.	Not triggered																												
44	E17	Where flooding characteristics exceed the levels identified in Condition E15 above the Proponent must undertake the following:	Flood Modelling Report Design Stage 1 Rev A 6 July 2024	This condition has not been triggered to-date for SSTOM package, this is to be revisited in the next revision of the flood modelling assessment.	Not triggered																												
45		(a) consult with affected landowners for properties adversely flood affected as a result of the CSSI regarding appropriate mitigations; and																															
46		(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.																															

47		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.			
48	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.	Audit discussion	This condition has not been triggered as construction is still underway.	Not triggered
49		<b>HERITAGE</b>			
50		<b>Non-Aboriginal Heritage</b>			
51	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.	SM-20-00099497 Unexpected Finds Procedure v4.0.docx Non-Aboriginal Heritage Management Plan, Rev 00 dated 20 June 2023 (for ER endorsement and DPE submission)	Unexpected finds procedure sighted. The methods to follow in the event of any heritage item (identified or unexpected) are detailed in the NAHMP. No heritage item has been impacted and there were no heritage items identified in the current audit period on SSTOM.	Compliant
52	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.	Audit discussion, site observation Non-Aboriginal Heritage Management Plan, Rev 00 dated 20 June 2023 (for ER endorsement and DPE submission)	Currently in process with sub consultant Urbis to develop plan to remove/reassembly of the Jib Crane. Section 6.8.1 of the NAHMP specifically deals with Jib Crane Management.	Not triggered
53	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.	Audit discussion, site observation	The St Marys Goods Shed has not been impacted at the time of this audit.	Not triggered

54	E22	The Archaeological Research Design included in the documents listed in Condition A1 must be implemented during construction.	<p>Audit discussion</p> <p>SM WSA EIS 2020 SM WSA Submissions Report</p> <p>Non-Aboriginal Heritage Management Sub-plan Rev01 dt 17 Jul 2023</p> <p>SSI-10051 IEA No 4 by Wolfpeak, September 2023</p>	<p>There has not been any work regarding archaeological research design implementation during SSTOM contract works in this audit period. The EIS stated that <i>an Archaeological Research Design will be prepared for the project to manage any items of local heritage significance.</i></p> <p>The Submissions Report includes Archaeological Research Design in Appendix K and stated that <i>the crane is not currently in operation.</i></p> <p>As noted in the NAHMP section 6.6 Archaeological Method Statement (AMS), <i>Archaeological Research Design (Artefact 2021) (ARD) identifies that, should construction works impact nominated areas of significant archaeology, impacts should be managed in accordance with an AMS. An activity specific AMS <b>would</b> be prepared for SSTOM works for ground disturbing activities in the area of the St Marys Goods Yard and Shed.</i></p>	Not triggered
55	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.	<ul style="list-style-type: none"> <li>• Letter signed by Rochelle Johnston, Senior Manager Major Projects NSW Heritage, to Sydney Metro on consultation to nominate an Excavation Director in consultation with Heritage NSW, dated 15 August 2023</li> <li>• Letter SM to DPE - Sydney Metro Western Sydney Airport (SMWSA) - Submission of nominated Excavation Director, dated 16 August 2023</li> <li>• DPE Response to nomination of Tony Stening to the role of Excavation Director, dated 05 September 2023</li> </ul>	Documents sighted indicate that the required personnel have been approved and appointed at the start of construction works (8 August 2023) by SSTOM.	Compliant

56	E24	<p>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).</p>	<p>St Marys Railway Station, St Marys: Archival Recording - Final Report by biosis, Rev01 dated 11 January 2022 - including photographs.</p> <p>Sydney Metro internal email from Georgia Wright dated 30 October 2023 confirming submission of archival digital recording reports in the Major Projects portal for Heritage NSW.</p> <p>Non Aboriginal Heritage Management Sub-plan SMWSASSM-PLD-1NL-PC-PLN-000026 (Rev 01)</p> <p>Audit discussion</p>	<p>Archival photographic digital recording has been undertaken by Sydney Metro and/or previous contractors for:</p> <ul style="list-style-type: none"> <li>• St Marys Railway Station (including the jib crane)</li> <li>• Luddenham Road Alignment</li> <li>• McMaster Farm</li> <li>• McGarvie-Smith Farm</li> <li>• Kelvin (the State Heritage listed curtilage)</li> <li>• Bringelly RAAF Base.</li> </ul> <p>Any heritage items that will be affected by the SSTOM Works that has not already undergone an archival recording, will undergo an archival photographic digital recording. No additional archival recordings have been undertaken to date.</p> <p>Noted in section 6.4 of the approved NAHMP.</p>	Compliant
57	E25	<p>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.</p>	<p>Sydney Metro Heritage Working Group Meeting minutes dated 21 February 2024</p> <p>Sydney Metro internal email from Georgia Wright dated 30 October 2023 confirming submission of archival digital recording reports in the Major Projects portal for Heritage NSW.</p> <p>Audit discussion</p>	<p>Archival recording reports were submitted to Heritage NSW via the major projects portal on 22 December 2023. Minutes from the February Heritage Working Group sighted, that indicates the submission of Western Sydney Airport archival recordings for information in accordance with condition E25; Heritage NSW confirming receipt.</p> <p>It is noted that the sighted St Marys station Archival recording final report is dated 11 January 2022, the email confirmation of submission dated 30 October 2023 refers to draft report, not final and the provided meeting minutes is from 21 February 2024 - not within the 12 month timeframe required by this condition.</p> <p>Given the works related to heritage items are ongoing as confirmed by the auditee, this condition is not applicable in this audit.</p>	Not triggered
58	E26	<p>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.</p>	<p>Audit discussion</p>	<p>It is noted this condition will be triggered upon completion of all works.</p>	Not triggered

59	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.	Audit discussion	It is noted this condition will be triggered upon completion of all works.	Not triggered
60	<b>Aboriginal Heritage</b>				
61	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.	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dated August 2021  Construction Environment Management Plan (CEMP) Rev 00 dated 27 June 2023	The ACHMP is a Sydney Metro document, prepared prior to SSTOM contract. Chapter 4 of ACHMP details the processes to protect Aboriginal heritage values. The SSTOM CEMP refers to this plan and the Sydney Metro Unexpected Heritage Finds procedure. However, no objects or places of Aboriginal cultural significance has been discovered during SSTOM works. As per evidence reviewed, no work has been undertaken on SSTOM package of works that impacted Aboriginal objects or places.	Compliant
62	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.	23159-WSA Quarterly RAP update_v2.pdf  Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dated August 2021  Email from Colin Davison on 12 December 2023 to various RAPs	Quarterly Registered Aboriginal Party (RAP) update - December 2023, which is available on the Sydney Metro website. This was emailed to RAPs on 12 December 2023.  ACHMP section 3.1 refers to ongoing consultation protocols regarding RAPs, section 3.2 refers to dissemination of project ACHMP related information.	Compliant
63	E30	The Aboriginal Cultural Heritage Management Plan included in the documents listed in Condition A1 must be updated to include:	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dated August 2021	ACHMP Rev6 sighted (Final redacted version)	Compliant
64		(a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed;		Section 4.2.2 of ACHMP provides the survey methodology	
65		(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;		Sections 4.2.3 and 4.3 of ACHMP provides survey and test excavation methodology	
66		(c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations;		Figures 4-1a to 4-1d of ACHMP provides the maps	
67		(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;		Section 5.8 of ACHMP provides processes to update maps following new discoveries.	
68		(e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and		Section 5.8 of ACHMP provides processes to compare predictions following new discoveries.	

69		(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.		Section 8.5 of ACHMP provides process for periodic review of ACHMP.
70		The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations.	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dated August 2021  <a href="https://www.sydneymetro.info/western-sydney-airport-line/environment-planning">https://www.sydneymetro.info/western-sydney-airport-line/environment-planning</a>  SSI10051 IEA No 4 September 2023, Wolfpeak	Specific evidence of submission to Planning Secretary was not verified in this audit. However, Sydney Metro website for WSA project refers to this condition and states that the ACHMP has been updated and submitted to the Planning Secretary for information prior to works.  The previous audit by Wolfpeak (Audit No 4) stated <i>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)</i>
71		<i>Note: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.</i>		Noted
72	E31	The updated Aboriginal Cultural Heritage Management Plan must be implemented for the duration of salvage activities and construction.	Audit discussion  Sydney Metro SSTOM website	The current version of the ACHMP is on website - Compliant Auditor was advised that the plan is currently in process of being updated.
73	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:	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dated August 2021	Sections 5.7 and 5.8 of ACHMP provides reporting procedures including review by RAPs. No test and salvage excavations have been identified in this audit on SSTOM package of works so the reports have not been required to be prepared. Not triggered
74		(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		
75		(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).		
76		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, Gandangara LALC and Deerubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).		

77	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.	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dt Aug 2021	Sections 4.5 and 4.6 of ACHMP provides procedures to follow. However, no objects or places of Aboriginal cultural significance has been discovered during SSTOM works.	Not triggered
78	<b>Unexpected Finds and Human Remains</b>				
79	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.	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dt Aug 2021  Sydney Metro Unexpected Heritage Finds Procedure v4.1 dt May 2021	Sections 4.5 and 4.6 of ACHMP refers to Unexpected Heritage Finds and Human Remains procedure. The Sydney Metro Unexpected Heritage Finds procedure includes management of human skeletal remains.	Compliant
80	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.	Exhumation Management Procedure v5.1 dt May 2021  <a href="https://www.sydneymetro.info/western-sydney-airport-line/environment-planning">https://www.sydneymetro.info/western-sydney-airport-line/environment-planning</a>  SSI10051 IEA No 4 Sept 2023, Wolfpeak	The Sydney Metro website refers to this condition E35, and states <i>the Unexpected Heritage Finds and Human Remains Procedure has been 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.</i> This occurred prior to SSTOM contract commencement.	Compliant
81	E36	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.	Aboriginal Cultural Heritage Management Plan (ACHMP) Rev6 dt Aug 2021	The procedure is referenced in SSTOM CEMP. However, no objects or places of Aboriginal cultural significance has been discovered during SSTOM works.	Not triggered
82		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.	Sydney Metro Unexpected Heritage Finds Procedure v4.1 dt May 2021  Exhumation Management Procedure v5.1 dt May 2021	There have been no investigations triggered from unexpected archaeological finds as there have been no unexpected finds of Aboriginal cultural significance during SSTOM works.	



83		<i>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.</i>	<a href="https://www.sydneymetro.info/western-sydney-airport-line/environment-planning">https://www.sydneymetro.info/western-sydney-airport-line/environment-planning</a>  SSI10051 IEA No 4 Sept 2023, Wolfpeak	Noted. Section 2.3 and Table 2 of the Unexpected Finds Procedure refers to reporting requirements.	
84		<b>NOISE AND VIBRATION</b>			
85		<b>Land Use Survey</b>			
86	E37	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Detailed Noise and Vibration Impact Statements required under Condition E47.	Land use Survey by VMS Australia dated 15 September 2023 (for SSTOM Construction Noise and Vibration Impact Assessment)  St Marys Temporary Bus Interchange Early Works Detailed Noise and Vibration Impact Statement (DNVIS) 24 November 2021, Acoustic Consultants Australia	Land use survey has been undertaken with regard to CNVIA for the SSTOM scope areas. The survey results are referenced in Section 6 (Sensitive Receivers) of the DNVIS.	Compliant
87		<b>Construction Hours</b>			
88	E38	Work must only be undertaken during the following hours:	St Marys Temporary Bus Interchange Early Works Detailed Noise and Vibration Impact Statement (DNVIS) 24 November 2021, Acoustic Consultants Australia	Section 5 of the DNVIS and Section 5 of the NVMP stipulate construction hours in line with this condition.	Compliant
89		(a) 7:00am to 6:00pm Mondays to Fridays, inclusive;			
90		(b) 8:00am to 1:00pm Saturdays; and	Noise and Vibration Management Sub-plan, Rev 02, 1 August 2023		
91		(c) at no time on Sundays or public holidays.			

92		<b>Highly Noise Intensive Work</b>			
93	E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by Condition E42, highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken:	Sydney Metro Western Sydney Airport Out-of-hours Work Protocol v2.0 dated 8 November 2021  Letter dated 11 November 2021 from Jack Shackleton, Director Infrastructure Management, DPIE to Hugh Chapman Sydney Metro approving Sydney Metro - Western Sydney Airport (SSI-10051) Out of Hours Work Protocol  Detailed Noise and Vibration Impact Statement (DNVIS) 24 November 2021, Acoustic Consultants Australia	There is no specific allowance in the EPL for highly noise intensive work. Section 9 of DNVIS, section 5 of the NVMP and the OOHW protocol have details of the highly noise intensive work management. Sydney Metro advised at the audit that <i>Highly noise intensive works are currently being managed on sites during toolbox talk and SWMS sessions however documentation for these communications should be improved to better capture site discussions. However compliance with respite hours is being achieved by the Project as required under Condition E39. Improvement in formal communication of this requirement has been identified and updates to induction material has been scheduled.</i>	Compliant
94		(a) between the hours of 8:00 am to 6:00 pm Monday to Friday;	Noise and Vibration Management Sub-plan, Rev 02, 1 August 2023	The Standard and Out of Hours Work Toolbox Talk, dated 17 November 2023 gives an example of a toolbox talk for High Noise Impact Works.	
95		(b) between the hours of 8:00 am to 1:00 pm Saturday; and	231120 STM OOH Training - EPL Variation 1 .potx		
96		(c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour.	Audit discussion  <a href="#">The Standard and Out of Hours Work Toolbox Talk, dated 17 November 2023 gives an example of a toolbox talk for High Noise Impact Works.</a>		
97		<i>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.</i>		Noted	
98	E40	This approval does not permit blasting.	Audit discussion	No blasting is undertaken in SSTOM works.	Compliant
99		<b>Variation to Work Hours</b>			
100	E41	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances:	Sydney Metro Western Sydney Airport Out-of-hours Work Protocol v2.0 dt 8 Nov 2021	NVMP, OOHW protocol and OOH training presentation cover the elements of this requirement.	Not triggered
101		(a) Safety and Emergencies, including:		Condition E41-a - deliveries for Safety and Emergencies - has not been triggered.	
102		(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or	Letter dated 11 Nov 2021 from Jack Shackleton, Director Infrastructure Management, DPIE to Hugh Chapman Sydney Metro approving Sydney Metro - Western Sydney Airport (SSI-10051) Out of Hours Work Protocol		
103		(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		In the audit interview, PLM responded that <i>Approval from the EPA via the Environment Protection Licence (EPL) will be obtained for out of hours works (OOHW) in accordance with Condition D41(c). No OOHW that are not subject to an EPL have been identified and the Sydney Metro OOHW Protocol has not been utilised. A DNVIS will be prepared if OOHW exceed the NML (as per Condition E47). Community consultation will be undertaken during the Project to identify appropriate respite periods for OOHW. The</i>	
104		(b) Low impact, including:			
105		(i) construction that causes LAeq(15 minute) noise levels:	E57 Out of Hours Deliveries		
106		• no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and	Consultation report - St Marys - 13 Oct 2023		
107		• no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and	EPL21807		
108		(ii) construction that causes:			

109	<ul style="list-style-type: none"> <li>• continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or</li> </ul>	Noise and Vibration Management Sub-plan, Rev 02, 1 Aug 2023	<p><i>outcomes of the community consultation, the identified respite periods and the scheduling of the likely OOHW will be provided to the ER, EPA and the Planning Secretary prior to the work commencing.</i></p>
110	<ul style="list-style-type: none"> <li>• intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or</li> </ul>	231120 STM OOH Training - EPL Variation 1 .potx Audit discussion	
111	(c) By Approval, including:		
112	(i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or		
113	(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		
114	(iii) negotiated agreements with directly affected residents and sensitive land user(s); or		
115	(d) By Prescribed Activity, including:		
116	(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		
117	(ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or		
118	(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		
119	(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		
120	(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		
121	(vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week.		
122	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.		

123		<i>Notes:</i>		Noted	
124		1. <i>Tunnelling does not include station box excavation.</i>			
125		2. <i>Tunnelling ancillary support activities includes logistics support and material handling and delivery</i>			
126		<b>Out-of-Hours Work Protocol – Work not subject to an EPL</b>			
127	E42	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:	Sydney Metro Western Sydney Airport Out-of-hours Work Protocol v2.0 dt 8 Nov 2021  Letter dated 11 Nov 2021 from Jack Shackleton, Director Infrastructure Management, DPIE to Hugh Chapman Sydney Metro approving <i>Sydney Metro - Western Sydney Airport (SSI-10051) Out of Hours Work Protocol</i>	OOHW protocol has been prepared to address this condition requirements and been approved by DPIE, prior to commencement of SSTOM package works.	Compliant
128		(a) justification for why out-of-hours work need to occur;			
129		(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:	EPL21807		
130		(i) the ER reviews all proposed out-of-hours activities and confirms their risk levels;	Noise and Vibration Management Sub-plan, Rev 02, 1 Aug 2023		
131		(ii) low risk activities that can be approved by the ER; and			
132		(iii) high risk activities that are approved by the Planning Secretary;	231120 STM OOH Training - EPL Variation 1 .potx		
133		(c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;	Audit discussion		
134		(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;			
135		(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			
136		(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.			
137		This condition does not apply if the requirements of Condition E41 are met.			
138		<i>Note: Out-of-hours work is any work that occurs outside the construction hours identified in Condition E38 and E39.</i>		Noted	

139		Construction Noise Management Levels and Vibration Criteria			
140	E43	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria:	Detailed Noise and Vibration Impact Statement Reports - available on Parklife Metro website: St Marys Metro Station October 2023	DNVIS reports sighted include OOHW impact reporting and mitigation measures (standard and additional) implemented, monitoring and noise audits.	Compliant
141		(a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009);	(Standard Hours Oversized Plant Delivery), November 2023 (Concreting works OOHW EPL Variation report by VMS Australia)	Noise management levels and vibration criteria are stated in the DNVIS, NVMP documents sighted in this audit. There has not been exceedances of NML or vibration limits within SSTOM during the audit period.	
142		(b) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);	and Orchard Hills Station December 2023 (Construction and Standard Hours Oversized Plant Deliveries)	Site observations noted that noise mitigation measures as per NVMP were implemented. No explosives are stored and used on SSTOM package works.	
143		(c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure);	EPL reports - September 2023 to January 2024, available on Parklife Metro website		
144		(d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and	Noise and Vibration Management Sub-plan, Rev 02, 1 August 2023		
145		(e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).	Site observation		
146		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.			
147		<i>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.</i>		Noted	
148	E44	All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded:	Noise and Vibration Management Sub-plan, Rev02, 1 Aug 2023	Sections 6.2, 8 and 9 of NVMP address this requirement. There has been a few noise related complaints during SSTOM works as noted in the complaints register related to heavy vehicle movement. Complaints have been addressed and closed .	Compliant
149		(a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and	SMWSA Monthly Complaints Reports		
150		(b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A).			
151		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.			
152	E45	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.	Noise and Vibration Management Sub-plan, Rev02, 1 Aug 2023  SMWSA Monthly Complaints Reports	Section 9.3 of NVMP addresses this requirement. There has been no noise-generating work in the vicinity of sensitive receivers.	Compliant

153		<b>Construction Noise and Vibration Mitigation and Management</b>			
154	E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to:	Noise and Vibration Management Sub-plan, Rev02, 1 August 2023	NVMP Section 9.1 Table 26 addresses the measures and site observation noted that these have been implemented. There has been no complaints from work on SSTOM sites as per complaints register.	Compliant
155		(a) use of regularly serviced low sound power equipment;	Site observation		
156		(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;			
157		(c) use of non-tonal reversing alarms; and			
158		(d) use of alternative construction and demolition techniques.			
159	E47	Detailed Noise and Vibration Impact Statements (DNVIS) must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87. The DNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the DNVIS must be provided to the ER before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the DNVIS.	St Marys Temporary Bus Interchange Early Works Detailed Noise and Vibration Impact Statement (DNVIS) 24 November 2021, Acoustic Consultants Australia	DNVIS is available on Sydney Metro website and identifies sensitive receivers and includes specific mitigation measures in sections 8, 9 and 11. Noise mitigation measures were observed to be implemented during site visit. DNVIS has been prepared by specialist noise consultants.	Compliant
160	E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	Noise and Vibration Management Sub-plan, Rev02, 1 Aug 2023	NVMP sections 7.2.4 and 9.3 detail the processes to be followed in the event this condition is triggered. NVMP has stated this to be low risk due to distance with residential properties where vibration-causing SSTOM works may occur. Section 6.4.4 prescribe minimum working distances.	Not triggered

161	E49	Where sensitive land use(s) are identified in Appendix B as exceeding the highly noise affected criteria during typical case construction, mitigation measures must be implemented with the objective of reducing typical case construction noise below the highly noise affected criteria at each relevant sensitive landuse(s). Activities that would exceed highly noise affected criteria during typical case construction must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary.	Noise and Vibration Sub-plan Rev02 Detailed Noise and Vibration Impact Statement DNVIS Reports on Parklife Metro website	Sections 7.2.1, 8.2 and 9 of NVMP and DNVIS include methods to apply for highly noise affected receivers during typical works. There has not been work undertaken within SSTOM package to trigger this condition	Not triggered
162		<i>Note: Mitigation measures may include path barrier controls such as acoustic sheds and/or noise walls, at-property treatment, or a combination of path and at-property treatment.</i>		Noted	
163	E50	For all construction sites where acoustic sheds are installed, the sheds must be designed, constructed and operated to minimise noise emissions. This would include the following considerations:	Audit discussion, site observation	SSTOM package works have not installed new acoustic sheds.	Not triggered
164		(a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feasible and reasonable;			
165		(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			
166		(c) the doors of acoustic sheds would be kept closed during the night-time period. Where night-time vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.			
167	E51	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.	Audit discussion  Noise and Vibration Sub-plan Rev02  Detailed Noise and Vibration Impact Statement DNVIS Reports on Parklife Metro website	No at property treatment identified for SSTOM works.	Not triggered
168		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.			
169		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.			

170	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.	Noise and Vibration Sub-plan Rev02	Section 8.2 of the NVMP specifies this condition.	Compliant
171		<i>Note: If an offer has been made but is not accepted, this does not preclude the commencement of construction under Condition E49.</i>		Noted	
172	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.	Noise and Vibration Sub-plan Rev02	Section 9.2 of NVMP provides additional noise and vibration management measures	Not triggered
173		<b>Construction Vibration Mitigation – Heritage Items</b>			
174	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.	Noise and Vibration Sub-plan Rev02 Non-Aboriginal Heritage Management Sub-plan SMWSASSM-PLD-1NL-PC-PLN-000026 (Rev 01) St Marys DNVIS on Sydney Metro website 4 Nov 2021 Audit discussion	Vibration testing details are included in section 9 of the DNVIS. No vibration generating activities have occurred with potential to impact heritage items.	Not triggered
175	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.	Non-Aboriginal Heritage Management Sub-plan SMWSASSM-PLD-1NL-PC-PLN-000026 (Rev 01) St Marys DNVIS on Sydney Metro website 4 Nov 2021	Section 6.9 of the NAHMP outlines the process for vibration monitoring in the event vibration criteria are predicted to be exceeded by SSTOM Works. This includes contacting the Project heritage specialist for advice on methods and locations for installing equipment on heritage items if required. The requirement for vibration monitoring on heritage items has not been triggered as of the date of this audit.	Compliant



<b>Utility Coordination and Respite</b>						
176						
177	E56	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must:	SM-WSA CI Meeting Minutes #001 20231019	Cumulative impact meetings (run by Sydney Metro) scheduled with SBT - occurs monthly. Minutes from Oct 2023, Nov 2023 and Jan 2024 sighted. Cumulative impacts from all packages, and any neighbouring projects that have been identified, are discussed at these meetings. The auditor was advised that the outcomes of weekly planning meetings are documented in the OOHW Schedule, which is used to ensure respite is achieved in accordance E57 <b>OBSERVATION:</b> The OOHW schedules are not detailed on the respite or mitigation details. There are activities with 20-30dB noise occurring at night, however, there are no respite or mitigation measures included.	Compliant	OBS-E-1
178	(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	SM-WSA CI Meeting Minutes #002 20231116				
179	(b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and	SM-WSA CI Meeting Minutes #003 20240118				
180	(c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation.	SSTOM OOHW Register 31 January 2024				
181	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.	SSTOM OOHW Register 29 February 2024 Audit discussion				
<b>Out-of-Hours Works – Community Consultation on Respite</b>						
183	E57	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:	Audit discussion OOHW protocol EPL21807 Community and Communication Strategy - Delivery Rev0 dt 3 Nov 2023 (available on Parklife Metro website) Sydney Metro WSA - SSTOM - STM - E57 St Marys Station Consultation Report 14 Dec 2023	Monthly construction updates for each site include details of upcoming OOHW. Examples of monthly consultation sighted: - St Marys Station - Orchard Hills Station - Aerotropolis Core Station A summary of consultation undertaken by Parklife Metro in regards to consultation requirements for OOHW is summarised in each E57 Report. The mitigation measures section of the DNVIS report states that letterbox drops occur on a monthly basis. The consultation reports refer to E57 requirements including three month outlook in consultation timeline. Approval from the EPA via EPL is to be obtained for OOHW in accordance with Condition D41(c). No OOHW that are not subject to an EPL have been identified and the Sydney Metro OOHW Protocol has not been utilised. A DNVIS report is to be prepared if OOHW exceed the NML (as per Condition E47). Community consultation is to be undertaken during the Project to identify appropriate respite periods for OOHW. The	Compliant	
184	(a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work;	E57 Consultation Report – St Marys Metro Station Out-of-hours deliveries 13 Oct 2023				
185	(b) a description of the potential work, location and duration of the out-of-hours work;	Sydney Metro WSA - SSTOM - OHE - E57 Orchard Hills Station Consultation report, 23 Jan 2024				
186	(c) the noise characteristics and likely noise levels of the work; and	Aerotropolis_Construction_Notification_January_2024				
187	(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).					

188		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.		outcomes of the community consultation, the identified respite periods and the scheduling of the likely OOHW will be provided to the ER, EPA and the Planning Secretary prior to the work commencing.
189		<i>Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.</i>		Noted
190		<b>Noise Mitigation - Operational Noise and Vibration Mitigation Measures</b>		
191	E58	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:	Audit discussion	Auditor was advised that ONVR is being prepared Not triggered at the time of the audit and is to be reviewed in the next audit.
192		(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);		
193		(b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately calibrated noise model;		
194		(c) identify sensitive landuses that are predicted to exceed:		
195		(i) noise criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013), Noise Policy for Industry (EPA, 2017); and		
196		(ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006);		
197		(d) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on:		
198		(i) source control and design;		
199		(ii) at the receiver (if relevant); and		
200		(iii) 'best practice' achievable noise and vibration outcome for each activity;		
201		(e) describe how the final suite of mitigation measures will achieve:		
202		(i) the noise criteria outlined in the Rail Infrastructure Noise Guideline (EPA, 2013) and Noise Policy for Industry (EPA, 2017); and		
203		(ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006);		

204		(f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures being offered;			
205		(g) include procedures for operational noise and vibration complaints management, including investigation and monitoring (subject to complainant agreement).			
206		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.			
207		The Proponent must implement the identified noise and vibration control measures and make the ONVR publicly available.			
208		<i>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.</i>		Noted	
209	E59	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.	Audit discussion	ONVR is under preparation. Refer to Condition E58.	Not triggered
210		The report must be submitted to the Planning Secretary within six months of submitting the ONVR.			
211		<i>Note: Not having finalised detailed design is not sufficient justification for not implementing the proposed mitigation measures.</i>		Noted	
212	E60	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:	Project is still in construction phase.	Condition E60 is not triggered as the SSTOM works are still in construction phase.	Not triggered
213		(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;			

214		(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;		
215		(c) a review of the performance of the CSSI against the:		
216		(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);		
217		(ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006);		
218		(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);		
219		(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;		
220		(f) identification of:		
221		(i) additional measures to meet the criteria outlined in the NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017),		
222		(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);		
223		(iii) when these measures are to be implemented; and		
224		(iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA.		
225		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.		
226		<i>Note: Refer to Condition B5 about how personal information will be handled.</i>	Noted	
227		<b>PLACE, URBAN DESIGN AND VISUAL AMENITY</b>		
228		<b>Construction Sites</b>		
229	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.	Site observations	Wayfinding information via hoardings have been installed. Compliant

230	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.	Visual Amenity Management Subplan SMWSASSM-PLD-1NL-PC-PLN-000027 (Rev 00) 27 Jun 23  Monthly Complaints records  Weekly light spill inspection report, 16 Feb 2024 6am, Colm Kennedy  Site observation	Section 6 of VAMP addresses the requirement. Temporary hoarding has been erected, space constraints do not allow landscaping and vegetative screening. Light spill has been reviewed and actions developed. Weekly light spill inspections are undertaken. There has not been light spill related or visual amenity complaints.	Compliant
231	<b>Design Requirements and Strategic Context</b>				
232	E63	The CSSI must be designed with consideration of:	SSTOM Stage 1 PUDCLP Ver.0 Nov 2023		Compliant
233	(a)	the design objectives, principles and guidelines identified in documents listed in Condition A1;		Sections 2 and 3 of PUDCLP refers to design objectives, principles and guidelines as per EIS and Submissions Report	
234	(b)	the principles and objectives of the draft Connecting with Country Framework;		Section 4 of the PUDCLP discusses approaches on Connection to Country	
235	(c)	relevant land use changes, masterplans and initiatives, where this information is known and/or available;		Section 6 of PUDCLP refers to relevant land use changes, masterplans and initiatives.	
236	(d)	existing and proposed future local context and character; and		Sections 5 and 6 of PUDCLP discuss existing and proposed future local context as reviewed for Stage 1 SSTOM works.	
237	(e)	transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined.		Section 2 of the PUDCLP discuss transport and land use integration and system functionality.	
238		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).		PUDCLP includes review and advice by the DRP in Appendix C.	
239		<i>Note: In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.</i>		Noted	
240	<b>Design Guidance and Standards - Lighting and Security</b>				
241	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:	Visual Amenity Management Subplan SMWSASSM-PLD-1NL-PC-PLN-000027 (Rev 00) 27 Jun 23  SSTOM Stage 1 PUDCLP Ver0 Nov2023	Section 6 of VAMP addresses the requirement. Weekly light spill inspections are undertaken. Lighting management via hoarding and other measures was observed during site visit.	Compliant
242	(a)	AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;	Monthly Complaints records	There has been one corrective/preventive action prescribed from light spill inspection on 16 Feb 2024 <i>Directing light away from neighbouring properties, or - the installation of shielding on lights, or - Installation of screens.</i>	
243	(b)	NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports; and	Weekly light spill inspection report, 16 Feb 2024 6am, Colm Kennedy		
244	(c)	NASF Guideline C: Managing the risk of wildlife strikes in the vicinity of airports.	Site observation	Stage 1 PUDCLP sections 5 and 6 (as applicable to Stage 1 SSTOM works) refer to integrating requirements of this condition into design of precinct lighting. It is stated that lighting design is	

245		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.		precinct lighting. It is stated that lighting design is driven by the Particular Specification requirements as per AS1158, including design and management of obtrusive external lighting.	
246		<b>Design Guidance and Standards - Active Transport</b>			
247	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).	Audit discussion  Places, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1 Rev0 Nov 2023	Design is currently in progress and yet to be finalised. PUDCLP section 2 refers to design objectives and standards and section 6 refers to requirements of this condition.	Compliant
248	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.	Audit discussion  Places, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1 Rev0 Nov 2023	PUDCLP section 2 refers to Active transport design guidance and standards, sections 5-7 refer to the design guides and standards required by this condition being incorporated into the design. CPTED is currently addressed in the PUDCLP Stage 1: Luddenham Station building & Stabling and Maintenance Facility. It is noted that further information for other stations and the linewise works will be available in the future Stage 2 SSTOM PUDCLP.  Section 2.5.2 - Community safety and privacy, provides detail of the CPTED principles which have been applied to each station and includes consideration of: direct sightlines, mitigation of concealed spaces, CCTV, precinct activation, lighting design and customer assistance. CPTED also will be further considered in landscape design packages.	Compliant
249		<b>Design Review Panel and Design Review</b>			
250		<b>Panel Membership</b>			
251	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.	The SSI10051 approval is dated 23 July 2021. Letter from Matthew Todd-Jones, A/Director Infrastructure Management DPIE, granting extension of timeframe to form DRP until 23 March 2022.	The DRP is formed project-wide, not specific to SSTOM. DRP meeting history indicates attendee list and timeline for design elements and DRP register indicates Records of Advice and Recommendations Register 2022/2023/2024.	Compliant
252		<i>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.</i>		Noted	
253	E68	The responsibilities of the Design Review Panel include:	Design Review Panel Terms of Reference V1.0 dt 4 March 2022	DRP scope and functions are detailed in the Terms of Reference (ToR). DRP reviewed and provided advice to finalisation of the PUDCLP stage 1. DRP meeting history indicates attendee list and timeline for design elements and DRP	Compliant
254		(a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI			

255		(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		register indicates Records of Advice and Recommendations Register 2022/2023/2024.	
256		(c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines.			
257		The Panel’s advice must be consistent with the CSSI as approved.			
258	E69	The DRP must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, <i>where relevant</i> , by suitably qualified, experienced and independent professional(s) in each of the fields of:	Design Review Panel Terms of Reference V1.0 dt 4 March 2023	DRP ToR section 2 provides Governance, section 3 provides Roles and Responsibilities of constituents. The ToR aligns with the requirements of this condition.	Compliant
259		(a) urban design and place making;			
260		(b) landscape architecture; and			
261		(c) architecture.			
262		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.			
263	E70	Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.	Government Architect NSW letter 9 March 2022 endorsement of Sydney Metro DRP Terms of Reference (ToR) with ToR v 1.0 dated 4 March 2022 attached.	DRP ToR section 2 provides Governance, section 3 provides Roles and Responsibilities of constituents.	Compliant

264		<b>Operation of the Design Review Process</b>		
265	E71	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:	Government Architect NSW letter 9 March 2022 endorsement of Sydney Metro DRP Terms of Reference (ToR) with ToR v 1.0 dated 4 March 2022 attached.	Design Review Panel Terms of Reference sighted as endorsed by Government Architect and submission to DPIE. Section 3 and 4 provide roles and responsibilities and meeting format. Section 5 of ToR provides Cessation Arrangements.
266		(a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5);	Sydney Metro (Ben Armstrong, A/Dir Environment) Letter 15 March 2022 to DPIE submitting the DRP ToR	
267		(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	DPIE Letter (Matthew Todd-Jones, Team Leader Rail, DPIE) dated 24 March 2022, with acknowledgement.	
268		(c) identify cessation arrangements.		



269	E72	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference.	<p>Sydney Metro DRP Terms of Reference (ToR) with ToR v 1.0 dated 4 Mar 2022</p> <p>DPIE Letter dated 13 Jan 2022 approving extension of time for formation of DRP, signed by Matthew Todd-Jones, A/Director Infrastructure Management</p> <p>DRP 37 meeting agenda - 15 Feb 2024</p> <p>DRP 39 prebriefing presentation slides</p> <p>SMWSA DRP history - 7 Mar 2024 (excel)</p> <p>SMWSA DRP 2023 DRP Program</p> <p>WSA TDRP DRP 2022 6 month Program DRP register for IR 210224</p> <p>GANSW Letter RE Design Review Panel – Meeting 24, dated 21 August 2023</p> <p>GANSW Letter RE Design Review Panel – Meeting 34, dated 14 December 2023</p> <p>GANSW Letter RE Design Review Panel – Meeting 35, dated 20 December 2023</p> <p>GANSW Letter RE Design Review Panel – Meeting 38, dated 15 Mar 2024</p> <p>Design Review Panel – Meeting Agenda 38 for 29 February 2024</p> <p>Design Review Panel – Meeting Agenda 39 for 28 March 2024</p> <p>Sydney Metro - Western Sydney Airport Design Review Panel Terms of Reference, as amended 17 January 2024 and endorsed by GANSW</p> <p>Letter from GANSW to DRP RE: Endorsement updated Design Review Panel Terms of Reference, dated 17 January 2024.</p>	<p>Design Review Panel Terms of Reference sighted as endorsed by Government Architect and submission to DPIE. Section 3 and 4 provide roles and responsibilities and meeting format.</p> <p>Evidence sighted on condition E76 generally indicates operation and management of DRP.</p> <p>Provided meeting minutes indicate various DRP Panel roles and who attends the DRP including local councils (Penrith and Liverpool)</p> <p>Version 1.1 of the TOR dated 17 Jan 2024 was sighted (amended) and endorsed by GANSW.</p>	Compliant
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270	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.	Evidence Sighted as per E72 above	<p>Section 3.3 of the DRP ToR refers to Panel Advisor being appointed by GANSW. DRP 6-month Meeting schedule and register of advices/recommendations sighted.</p> <p>Meeting minutes were sighted to confirm attendance details.</p>	Compliant
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271	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.	Evidence Sighted as per E72 above	Meeting minutes were sighted to confirm attendance details.	Compliant
272	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.	PUDCLP - LDN and SMF (Rev 0)_FINAL for IC	PUDCLP Appendix C includes DRP review and advice details.	Compliant
273	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.	DRP 37 meeting agenda - 15 Feb 2024 DRP 39 prebriefing presentation slides SMWSA DRP history - 7 Mar 2024 (excel) SMWSA DRP 2023 DRP Program WSA TDRP DRP 2022 6 month Program DRP register for IR 210224	The DRP meeting history indicates attendee list and timeline for design elements and DRP register indicates Records of Advice and Recommendations Register 2022/2023/2024. DRP register indicates design development schedule.	Compliant
274		<b>Place, Urban Design and Corridor Landscape Plan</b>			
275	E77	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:	Stage 1 SSTOM PUDCLP Rev0 November 2023	PUDCLP Stage 1 Nov 2023 Ver 0 sighted include details of permanent built works and landscape design and maintenance at Luddenham station, stabling and maintenance facility and DRP review details. This Stage 1 SSTOM PUDCLP deals only with the Luddenham Station Building and Stabling and Maintenance Facility components of the SSTOM project. A future Stage 2 SSTOM PUDCLP will be prepared to incorporate the remaining station, precinct and corridor works within the SSTOM package.	Compliant
276		(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);	Stage 1 SSTOM PUDCLP Rev0 November 2023	PUDCLP Stage 1 Ver0 includes, in section 1.4 and Appendix D, details of key personnel whose profiles indicate qualifications and experience. Appendix A includes evidence of consultation with Penrith and Liverpool councils, WPCA, DPE, TfNSW, WSA, Heritage NSW, developers as well as ongoing involvement with various community and working groups. Appendix B includes consultation feedback during preparation of PUDCLP.	

277		(b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP;	Stage 1 SSTOM PUDCLP Rev0 November 2023	PUDCLP Appendix C refers to DRP review and advice details.	
			Letter from GANSW to DRP Chair RE Design Review Panel – Meeting 24, dated 21 August 2023, noting the re-engagement of Helen Lochhead as Independent Reviewer for the upcoming SSTOM and FSM PUDCLPs.	Details of person nominated by the DRP undertaking the review have been provided.	
278		(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	Stage 1 SSTOM PUDCLP Rev0 November 2023	Stage 1 PUDCLP section 1.6 states the final (Stage 2) document will be submitted to DPE prior to construction of permanent built surface works and landscaping. Early works are in progress at LDN and SMF sites - as such this subcondition has not been triggered.	
279		(d) implemented during construction and operation of the CSSI.	Stage 1 SSTOM PUDCLP Rev0 November 2023	Section 8 of PUDCLP includes timing and responsibility for implementation of PUDCLP. Works had not progressed to confirm implementation at the time of the audit.	
280		<i>Note: The PUDCLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</i>		Noted	
281		<b>Place, Urban Design and Corridor Landscape Plan - Documentation</b>			
282	E78	The PUDCLP must document how the following matters have been considered in the design and landscaping of the project:	Stage 1 SSTOM PUDCLP Rev0 November 2023	Section 1.6 of PUDCLP details how the relevant conditions are addressed in the PUDCLP. E63-E65 are noted to be addressed throughout various sections of PUDCLP.	Compliant
283		(a) the requirements of Conditions E63 to E65, and			
284		(b) advice and recommendations from the DRP.		PUDCLP Appendix C includes DRP review and advice details.	
285	E79	The PUDCLP must include descriptions and visualisations (as appropriate) of:	Stage 1 SSTOM PUDCLP Rev0 November 2023		Compliant
286		(a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals;		Section 6 of the Stage 1 PUDCLP includes design and visualisation of Luddenham station building. The SMF design and landscape details are included in section 5.	
287		(b) plans for station precincts including but not limited to		Section 1.6 of PUDCLP states that station precinct areas are not included in Stage 1 PUDCLP but will be in Stage 2 document. Preliminary plans for the station precinct are included in Section 6 of Stage 1 PUDCLP for information and context.	
288		(i) justification of the spatial scope of each station precinct plan;			
289		(ii) provision for public art and heritage interpretation installations;			
290		(iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents;			

291	(iv) interchange access plans developed in consultation with the Traffic and Transport Liaison Group;	
292	(v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures;	
293	(vi) design of commuter car parking elements, where relevant;	
294	(c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences;	Stage 1 PUDCLP section 5 provides design strategies including landscaping and building design, referring to visual impacts and landscape screen to reduce light spill and to deter graffiti.
295	(d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14;	Section 1.6 of Stage 1 PUDCLP states that this condition applies to the design of viaduct and bridges, to be covered in Stage 2 PUDCLP. This sub-clause has not been triggered.
296	(e) landscaping:	Section 1.6 of PUDCLP states that station precinct areas are not included in Stage 1 PUDCLP but will be in Stage 2 document. Preliminary plans for the station precinct are included in Section 7 of Stage 1 PUDCLP for information and context.
297	(i) landscape plan, hard and soft elements, for the corridor and the station precincts;	
298	(ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate;	Section 7 of the Stage 1 PUDCLP details the regional and endangered local vegetation communities and lists the typical planting species including native species. Section 1.5.2 states that the requirements of NASF ( <i>NATIONAL AIRPORTS SAFEGUARDING FRAMEWORK</i> ) Guideline C have been integrated into the design of the planting where applicable.
299	(iii) water sensitive urban design initiatives	Section 7.1.11 provides preliminary information on WSUD and passive irrigation design features. Section 1.6 compliance table indicates further information will be included in Stage 2 PUDCLP.
300	(vii) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;	Monitoring and maintenance procedures for the built elements, incl landscape works, are referred to in section 8 of Stage 1 PUDCLP. As per planned timing provided, more information is to be included in Stage 2 PUDCLP. Maintenance of all landscaped and revegetated works shall be carried out in accordance with TfNSW Specifications.

301	(viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport;	Section 1.6, compliance table, of Stage 1 PUDCLP states that measures to prevent wildlife strike risk have been integrated into the design of the planting where applicable. This is noted as a project biodiversity performance outcome in section 1.5.2 with corridor-length fencing and dedicated fauna culverts etc. The requirements of NASF (NATIONAL AIRPORTS SAFEGUARDING FRAMEWORK) Guideline C have been referenced (managing the risk of wildlife strikes)	
302	(f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant;	Section 7 of the Stage 1 PUDCLP provides details of planting strategies. It is not clear on any other strategies to rehabilitate, regenerate and revegetate areas as required. <b>OBSERVATION:</b> The compliance table in section 1.6 notes that this document is preliminary, with more details to be included in the Stage 2 document.	OBS-E-2
303	(g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;	Section 7 of the Stage 1 PUDCLP refers to landscaping elements and section 8 introduces implementation of the PUDCLP.	
304	(h) operational maintenance standards; and	There are references, in Stage 1 PUDCLP, to operational CEMP, operational specialist sub-plans, operational electricity consumption tool being prepared. Section 5.5 briefly refers to operational plant and equipment maintenance. Section 8 states that the Maintenance of all landscaped and revegetated works shall be carried out in accordance with TfNSW Specifications. <b>OBSERVATION:</b> More details are to be included in Stage 2 PUDCLP.	OBS-E-2
305	(i) the timing and responsibilities for implementation of elements included within the PUDCLP.	Section 8 of the Stage 1 PUDCLP provides high level timing for implementation across the SMF and Luddenham station works <b>OBSERVATION:</b> More details on responsibilities are to be included in Stage 2 PUDCLP.	OBS-E-2

306		<b>Operational Maintenance</b>		
307	E80	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the PUDCLP, required by Condition E79.		This is an operational condition and SSTOM is still Not triggered in construction.
308		The Planning Secretary must be advised prior to the transfer of the asset(s) to the relevant authority.		
309	E81	Should any plant loss occur during the maintenance period the plants must be replaced by the same plant species unless it is determined by a suitably qualified person that a different species is more suitable for that location.	Noted	Not triggered
310		<b>SOCIO-ECONOMIC, LAND USE AND PROPERTY</b>		
311	E82	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with third party property, and that such infrastructure and property is protected during construction.	Parklife Metro D&C STM – Precinct Utility Package – Design Report (Stage 2)	The design report section 3.4 sighted includes third party requirements and agreements with various entities such as Endeavour, Jemena, NBN, Telstra, Sydney Water, Penrith City Council
312	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.	Parklife Metro D&C STM – Precinct Utility Package – Design Report (Stage 2)	etc. Further interactions relevant to these engagements such as recurring meetings are also included in section 4.6. The design report includes, in Appendices, various third party agreements and requirements such as Sydney Water WSC case etc. Third party interfaces are noted as recurring meetings. Construction is in progress.

313		<b>Condition Survey</b>			
314	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>	<p>Dilapidation Surveys register prepared by Parklife, surveys undertaken by LandSurveys</p> <p>SMWSA SSI10051 IEA4 by Wolfpeak Sept 2023</p>	<p>Register of surveys undertaken/planned sighted. Surveys are undertaken by LandSurveys, registered and qualified surveying company with national presence.</p> <p>Survey register indicates Plan/Lot number, planned/actual survey timeframe, report detail etc. Condition surveys are in progress. Available reports include site conditions, defect classifications as identified in the survey. These works were completed during earlier stages/packages of work by SBT and SCAW and assessed as compliant by IEA no 4.</p>	Compliant
315	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>		<p>Condition E85 is relating to post construction condition surveys. Construction is still underway therefore this condition has not been triggered.</p>	Not triggered
316	E86	<p>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).</p>		<p>Condition E86 follows condition E85 and therefore has not been triggered.</p>	Not triggered

317	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.	Detailed Noise and Vibration Impact Statement (DNVIS), Acoustic Consultants Australia	No vibration monitoring requirements identified around ancillary facilities as per DNVIS. No tunneling work are undertaken in SSTOM package of works.	Not triggered
318	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.		SSTOM project does not include tunneling therefore this condition has not been triggered.	Not triggered
319	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.	Audit discussions	SSTOM project does not include tunneling therefore this condition has not been triggered.	Not triggered
320	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.		SSTOM project does not include tunneling therefore this condition has not been triggered.	Not triggered



321		<b>Small Business Owners Engagement Plan(s)</b>			
322	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.	<p>Small Business Owners Engagement Plan - St Marys (Parklife Metro D&amp;C) v.0 dt 10/11/2023</p> <p>Small Business Owners Engagement Plan - St Marys ( SBT - CPB Ghella) v.00 dt 12/5/2022</p> <p>SBOEP Advanced and Enabling Works (AEW) Jul 2021 v.1</p> <p>Post Approval online submission form18/08/2021, noting submission of the plan SBOEP-AEW Jul 2021 for information to DPE</p> <p>DPE auto-response receipt of submission of SBOEP 19 Aug 2021</p>	<p>The SBOEP refers to OCCS and includes contact facilities and information points. Section 5 identifies relevant adjacent businesses, issues mapping and mitigation measures.</p> <p>The SBOEP does not refer to the requirement that it must be submitted to the Planning Secretary for information before commencement of construction at St Marys. No evidence was sighted to confirm date of submission. Sydney Metro advised that the Small Business Owners Engagement Plan was originally prepared by CPBG prior to Project Construction commencement to satisfy this Condition, thus the requirement to submit to the Planning Secretary applies to SBT contract, not SSTOM.</p>	Compliant
323		<b>SOILS AND CONTAMINATION</b>			
324		<b>Contaminated sites</b>			
325	E92	<p>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 Contaminated Land Management Act 1997 (NSW).</p> <p><i>Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.</i></p>	FIW Contamination Register to PLM_201223.xlsx	<p>The DSI reports (undertaken prior to SSTOM takeover) - were prepared by SBT and SCAW contractors, recorded in a document register as handed over to SSTOM. The register provides TeamBinder document ID. No high-risk contaminated sites have been identified relevant to this package of works.</p>	Compliant

326	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 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.	This condition has not been triggered within this audit period for SSTOM. This condition has been assessed as compliant in IEA No 4 on SSI10051 on SBT and SCAW contracts.	Not triggered
327		<i>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.</i>	Noted	Separate RAPs have been prepared.
328	E94	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.	No remediation was required during the reporting period.	Not triggered
329		<i>Note: Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.</i>	Noted	
330	E95	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).	No Validation Reports have been prepared during the reporting period.	Not triggered
331		<i>Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.</i>	Noted	
332	E96	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.	No remediation has been undertaken during the audit period for the SSTOM works.	Not triggered
333		<i>Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.</i>	Noted	

334	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	FIW Contamination Register to PLM_201223.xlsx	The DSI reports (undertaken prior to SSTOM takeover) were prepared by SBT and SCAW contractors, recorded in a document register as handed over to SSTOM. No DSI, RAP, SAR, SAS and Validation report have been prepared for SSTOM works during the audit period.	Not triggered
335	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.	Contamination and Asbestos Unexpected Finds Procedure (Rev D) dt 9/6/2023	The procedure has been prepared as required, and included as appendix C in the Soil and Water Management Sub-plan. The auditor was advised that there had not been any unexpected finds so far in SSTOM contract works to trigger implementation of this procedure.	Compliant
336	E99	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.		The auditor was advised that there had not been any unexpected finds so far in SSTOM contract works to trigger implementation of this procedure.	Not triggered
337		<b>SUSTAINABILITY</b>			
338	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).	Sydney Metro WSA Sustainability Plan, Jan 2022  Letter of submission Ref SM-22-00002922 dated 21 Jan 2022 to Jake Shackleton, Director Infrastructure Management DPIE by Hugh Chapman, Director Environment, Sustainability and Planning, Sydney Metro: CSSI 10051 – Condition of Approval E100 & 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan .  SM WSA Sustainability Plan audit, GHD 2024	The letter of submission of the Sustainability Plan states the plan has been prepared to achieve IS rating of 75+ as required by this condition.	Compliant
339	E101	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.		Date of submission of Sustainability Plan is 21 January 2022. Date of Approval is 23 July 2021. Implementation of Sustainability Plan has undergone a separate compliance audit and implementation thereof confirmed.	Compliant
340		<i>Note: Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.</i>		Noted	

341	E102	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:	Water Reuse Strategy Sydney Metro – Western Sydney Airport SSTOM Rev0, dated 21 July 2023 SMWSASSM-PLD-1NL-SB-PLN- 000001SMWSASSM-PLD-1NL-SB-PLN- 000001	Parklife Metro Water Reuse Strategy has been prepared and is available on the project website.	Compliant
342		(a) evaluation of reuse options;		The Water Reuse Strategy evaluated water reuse options and defined as Water Targets.	
343		(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;		Section 3 of the Strategy details estimated quantities of non-potable water during construction phase and Section 4 refers to Operational water demand based on Sydney Water data, at various locations as relevant. Main sources of water are site-won and surface water. Rainwater harvesting options are also included based on annual rainfall, roof catchment etc. Potable water is sourced from Sydney Water network via metered connection where available, or via road transport, and supplied for potable purposes, domestic cleaning and where non-potable water is not satisfactory.	
344		(c) measures to avoid misuse of recycled water as potable water;		Section 3.2.4 of the Strategy includes public health risks from water recycling, including contamination of potable water with non-potable water, accidental consumption or misuse etc.	
345		(d) consideration of the public health risks from water recycling; and			
346		(e) time frame for the implementation of the preferred reuse option(s).		Section 3.2.3 of the Strategy provides implementation timeframes for each reuse option, such as site establishment, piling and civil site works, services and implementation of water reuse measures such as wheel-wash, settlement basins, water from water treatment plant etc.	
347		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.		This audit notes an <b>OBSERVATION</b> that the Water Reuse Strategy does not include details of consultation or advice from any agencies, or justification for not seeking that advice. The works are in early stages and application of strategy could not be verified during site visit.	OBS-E-3
348		Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail.		Reuse options are included in Water Reuse Strategy. This condition is not applicable.	

349		A copy of the Water Reuse Strategy must be made publicly available.		The Water Reuse Strategy is listed on the project website. <a href="https://parklifemetro.com.au/wp-content/uploads/2023/08/SMWSASSM-PLD-1NL-SB-PLN-000001-Sydney-Metro-WSA-SSTOM-Water-Reuse-Strategy-1.pdf">https://parklifemetro.com.au/wp-content/uploads/2023/08/SMWSASSM-PLD-1NL-SB-PLN-000001-Sydney-Metro-WSA-SSTOM-Water-Reuse-Strategy-1.pdf</a>	
350		<i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</i>		Noted	
351		<b>TRAFFIC AND TRANSPORT</b>			
352	E103	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>Overarching Construction Traffic Management Plan</p> <p>Post approval email confirming receipt of SSTOM OCTMP and OHSMF CTMP on 25 July 2023</p> <p>Cover letter accompanying submission of SSTOM OCTMP and OHSMF CTMP dated 24 July 2023</p> <p>Post approval form for SSTOM OCTMP and OHSMF CTMP</p> <p>Construction Traffic Management Plan – Aerotropolis Station</p> <p>Post approval form Aerotropolis CTMP Construction Traffic Management Plan – Airport Business Park Station</p> <p>Construction Traffic Management Plan – Airport Terminal Station</p> <p>Construction Traffic Management Plan – Luddenham Station</p> <p>Letter confirming receipt of SSTOM Luddenham Station CTMP Version B.</p> <p>Construction Traffic Management Plan – Orchard Hills Station</p> <p>Post approval form for SSTOM Orchard Hills CTMP</p> <p>Cover letter accompanying submission of SSTOM Orchard Hills dated 21 August 2023</p>	<p>The CTMPs are available on the project website and are prepared in accordance with CTMF.</p> <p>Formal date of construction commencement of SSTOM contract works, as per Sydney Metro letter to DPIE dated 1 August 2023, is 8 August 2023 (see condition A35).</p> <p>The overarching CTMP is dated 28 June 2023. Timing of work for each site specific CTMP is included in the specific CTMP.</p> <p>Submission of CTMP to DPIE date verified for the overarching CTMP (but not confirmed for every plan, as some are outstanding).</p>	Compliant
353		<b>Management of Heavy Vehicle Movements</b>			
354	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.	<p>Screenshot of satellite tracking of HV.</p> <p>Track Details extract :XN36RL 2024-02-26 06:50:00 - 2024-02-26 17:00:00</p> <p>Track Details extract:XO20EB 2024-02-26 07:00:00 - 2024-02-26 17:00:00</p>	<p>Satellite tracking is undertaken on heavy vehicles. The dashboard includes route map, vehicle ID, driver name, location, last known speed etc. There had been no request from DPIE and EPA for records to-date.</p>	Compliant

355	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.	Audit discussion	Only local roads approved in the EIS and RtS are proposed to be used.	Not triggered
356	E106	All requests to the Planning Secretary for approval to use local roads under Condition E105 above must include the following:	Audit discussion	Refer to Condition E105.	Not triggered
357		(a) a swept path analysis;			
358		(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;			
359		(c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and			
360		(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			
361		(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.			
362		<b>Road Dilapidation</b>			
363	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.	Pre-Const Road Dilapidation Surveys prepared by LandSurveys, Rev0 dated 1/6/2023- Luddenham Road North, Luddenham Road South, Patons Lane, Putland Street, Reserve Road, Gipps St. Document transmittal for the above surveys dated 13 July 2023.	Road Dilapidation Survey reports have been prepared before commencement of construction for SSTOM contract. Evidence of timely provision of the Road Dilapidation Survey Reports to Road Authorities sighted.	Compliant
364	E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion):	Site visit, Audit discussions	Not triggered. This requirement is included in site specific CTMPs.	Not triggered
365		(a) compensate the Relevant Road Authority for the damage so caused; or			
366		(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.			

367		<b>Construction Parking and Access Management</b>			
368	E109	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to:	Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dt 1/12/2023	The worker car parking strategy includes stakeholder consultation and responsibilities (Parklife Metro, Penrith City Council and TfNSW), manpower requirements over the course of the construction program etc.	Compliant
369		(a) minimise parking on public roads;	Overarching Construction Traffic Management Plan RevB 14/9/2023	Section 5 of the Strategy includes travel arrangements for workers and plans for communication, satellite parking arrangements and travel mode need survey.	
370		(b) minimise idling and queuing on state and regional roads;		Section 4.5.2 of the CTMP details the truck routes and has truck swept paths in Appendix A to manage disruption of public access. Section 5 of the CTMP sets out requirements for traffic impact management.	
371		(c) not carry out marshalling of construction vehicles near sensitive land use(s);	Site specific Construction Traffic Management Plans (see E103)		
372		(d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and			
373		(e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.			
374		<b>Property Access</b>			
375	E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	Site observation and Photos Construction Traffic Management Plans	Utility and property access has been maintained with limited disruption as sighted. The requirements are set out in CTMP. No complaints have been noted about access to utilities and properties.	Compliant
376	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.	Site observation and Photos Construction Traffic Management Plans	Refer to Condition E110.	Compliant
377	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.	Site observation and audit discussions Construction Traffic Management Plans	Refer to Condition E110.	Not triggered
378	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.	Site observation and audit discussions Construction Traffic Management Plans	Refer to Condition E110.	Not triggered

379	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.	<p>Site observation and audit discussions</p> <p>Small business engagement plan</p> <p>Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dt 1/12/2023</p> <p>Overarching Construction Traffic Management Plan RevB 14/9/2023</p> <p>Site specific Construction Traffic Management Plans (see E103)</p>	<p>Pedestrian, cyclist and vehicle access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter.</p>	Compliant
380	<b>Pedestrian and Cyclist Access</b>				
381	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.	<p>Site observation and audit discussions</p> <p>Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dt 1/12/2023</p> <p>Overarching Construction Traffic Management Plan RevB 14/9/2023</p>	<p>Pedestrian, cyclist and vehicle access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter.</p>	Compliant
382	<b>Road Traffic and Safety</b>				
383	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.	<p>TTLG meeting minutes #23-#30 for months of April - November 2023 and summary document in Nov 2023.</p>	<p>TTLG has been established between Sydney Metro, contractors (SBT, SCAW, SSTOM), TfNSW, CDC (Bus Operator), NSW Ambulance, Penrith and Liverpool councils, NSW Fire and Rescue and contractors of other relevant works in the area. Meeting minutes sighted indicate regular meetings are occurring.</p>	Compliant
384	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.	<p>Audit discussion</p>	<p>There have been no requirement from TfNSW or TTLG to undertake supplementary analysis and modelling.</p>	Not triggered



385		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:		
386		(a) in consultation with, and to the reasonable requirements of the relevant Traffic and Transport Liaison Group;		
387		(b) in consideration of existing and future demand, connectivity (in relation to permanent changes), performance and safety requirements;		
388		(c) to minimise and manage local area traffic impacts;		
389		(d) to, where possible and appropriate, retain or reinstate parking in St Marys;		
390		(e) to ensure access is maintained to property and infrastructure		
391		(f) to address relevant design, engineering and safety guidelines, including Austroads, Australian Standards and TfNSW requirements.		
392		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.		
393	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:	TTLG meeting minutes #23-#30 for months of April - November 2023 and summary document in Nov 2023.  Audit discussion	This condition has not been triggered within this audit period for SSTOM. No intersection performance issues have been noted in the audit period.  Not triggered
394		(a) Queen Street/Great Western Highway/Mamre Road in St Marys;		
395		(b) Glossop Street/ Forrester Road in St Marys; and		
396		(c) Glossop Street / Great Western highway in St Marys.		
397		Identified improvements must be implemented prior to the commencement of operation.		
398	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.	Audit discussion	There has been no permanent road work requirements to trigger this condition.  Not triggered

399		<b>UTILITIES MANAGEMENT</b>			
400	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.	Audit discussion	Design is still in progress, utility mapping is being planned; no impact with utilities have been identified in this audit period for SSTOM	Not triggered
401		<b>Warragamba to Prospect Water Supply Pipeline</b>			
402	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.	Audit discussion	Design is still in progress, no interaction with the Warragamba pipeline has occurred during this audit period for SSTOM.	Not triggered
403		<b>WASTE</b>			
404	E122	Waste generated during construction and operation must be dealt with in accordance with the following priorities:	Construction Waste Management Sub Plan Rev 01 dt 28 Jul 2023	Waste priorities as included in CWMP as below. There has not been any major construction waste generation to-date on SSTOM other than general garbage.	Compliant
405		(a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;		Section 5.1 includes Waste Hierarchy, Section 5.2 includes Waste classification and section 5.3 details waste avoidance and minimisation	
406		(b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and		Section 5.3.1 specifically addresses reuse and recycling initiatives.	
407		(c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.		Section 5.5 addresses waste transport and disposal. Wastes that are unable to be reused or recycled or retained will be disposed of offsite to an NSW EPA approved waste management facility following classification in accordance with the POEO Act and the WARR Act.	

408	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.	Audit discussion, Construction Waste Management Sub Plan Rev 01 dated 28 July 2023	Section 5.4 of the Waste Management Plan addresses waste handling and storage. As per audit discussions, no waste material is imported to SSTOM sites.	Not triggered
409	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.	Audit discussion, Construction Waste Management Sub Plan Rev 01 dated 28 July 2023	Section 5.5 of the Waste Management Plan addresses waste transport and disposal. Approved waste sites are included in waste disposal register and materials are disposed only upon the Environment Manager has released the hold point. Section 5.5.2 of the Plan refers to Waste Exemptions and lists applicable exemptions and orders. To-date, only general garbage and recyclables from administration buildings have been disposed off site. Refer to Condition E125.	Compliant
410	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.	2023_11_Office_Djurwa Pty Ltd-Webuild S.P.A.xlsx 2023_11_D&C_Djurwa Pty Ltd-Webuild S.P.A.xlsx	Bingo / Djurwa waste reports for the month of November 2023 sighted which include classification for all waste removed from site.	Compliant
411	<b>WATER</b>				
412	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.	EPL reports on Parklife Metro website <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a>	EPL21807 is in force. Monthly reports are on SSTOM website. Annual reports have not been triggered yet.	Compliant
413	<b>Construction Requirements</b>				
414	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.	Audit discussion Soil and Water Management Sub-plan Rev01	There has not been any work undertaken in riparian corridors or within 40m of a watercourse. Section 6.5 of SWMP provides processes to follow when works in waterways and temporary waterway crossings would be required. Section 6.7 refers to stockpile management processes and relevant guidelines.	Not triggered

415	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).	Site observations, Photos Soil and Water Management Sub-plan Rev01	ESC implemented on site as sighted. Section 6.1.1 of SWMP provides Erosion and Sediment Control plan processes and the hierarchy of controls. Section 6.1.2 details the ESC Strategy. Section 6.11 further details the management controls to minimise potential water quality impacts and contamination.	Compliant
416	E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed:	EPL21087 Soil and Water Management Sub-plan Rev01	An EPL is in force which specifies discharge criteria for the WWTP, therefore this condition is not applicable.	Not triggered
417		(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;			
418		(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			
419		(c) for bioaccumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level.			
420		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.			
421	E130	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.	Audit discussion WPIA - Water Discharge Impact Assessment Rev A02 17 November 2022 prepared by SBT contractor  EPL21807 dated 20 July 2023 variation issued 14 February 2024  Email from Parklife to NSW EPA requesting Licence Variation, dated 12 October 2023 Email from Parklife to NSW EPA requesting Licence Variation with attached letter summarising the Water Discharge Impact Assessment, dated 10 November 2023	Parklife Metro stated that a Water Pollution Impact Assessment (WPIA) has been submitted to the EPA to support the Environmental Protection Licence application and subsequent variations. As agreed with the EPA the submission of the WDIA prepared by the prior work contractors was appropriate for project licencing. The WDIA by SBT noted EPA Comments on Additional Information for WDIA – EPL No. 21672 in section 3.7 Consultation with EPA on EPL21807 WPIA sighted.	Compliant
422		<i>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.</i>		Noted	

423	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.	Audit discussion SSTOM contract works scope	Permanent and temporary watercourse crossings and stream diversions have not been required on SSTOM contract works in the audit period therefore this condition has not been triggered.	Not triggered
424		<b>Operational Requirements</b>			
425	E132	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:		Project is in construction phase, operational requirements have not been triggered.	Not triggered
426		(a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level;			
427		(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			
428		(c) for bioaccumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level.			
429		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.			
430		<b>Groundwater</b>			
431	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.	Biannual Groundwater Monitoring Report July to November 2023 - SBT - Rev B dated 29 January 2024	Six month groundwater quality and quantity reports - Rev B as updated to address Sydney Metro and ER comments. No material decline noted that required make-good provisions to date. During the audit discussion, Sydney Metro clarified that groundwater quality and quantity will continue to be managed by SBT until second half of 2024 therefore no reports have been produced by SSTOM during the reporting period.	Not triggered

432	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:	Audit discussion, site observation	No bulk excavations have been required for SSTOM in this audit period therefore this condition has not been triggered.	Not triggered
433		(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;			
434		(b) predicted incidental groundwater take (dewatering) including cumulative project effects;			
435		(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;			
436		(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;			
437		(e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and			
438		(f) a schematic of the conceptual hydrogeological model.			



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