

2ND INDEPENDENT AUDIT OF PLANNING APPROVAL REQUIREMENTS FOR THE SYDNEY INTERNATIONAL SPEEDWAY SSI PROJECT



Speedway circuit works.

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

Audit Organisation:	QEM Consulting Pty Ltd
Auditor:	Larry Weiss
Registration	Exemplar Global EMS Auditor Accreditation no. 12355
Audit References:	QEM 1803-IEA-026
Site inspection:	7 & 15 th October 2021
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1.0 EXECUTIVE SUMMARY

An Independent Audit was undertaken as required by State Significant Infrastructure (SSI) Project Approval SSI 10048 Condition A29 to obtain an independent and objective assessment of the [environmental performance](#) and [compliance](#) status of the Sydney International Speedway project.

This audit complies with the Department of Planning, Industry and Environment's Independent Audit Post Approval Requirement (PAR) document which specifies auditor competency, audit methodology and audit report format. A similar (initial) audit covered the first 3 months of construction, with this (second) audit focussing on the subsequent 6 months up to mid-October 2021. The audit was confined to Proponent and Principal Contractor design and construct compliance obligations, with pre-operational consent conditions excluded from the audit scope.

General / Overview. In general, construction performance was of a high standard, with few complaints, no reportable incidents or any adverse stakeholder feedback.

However, there were a few design compliance issues including but not limited to design specification, performance outcome confirmation and resulting development impacts. In summary, inadequate records around performance evaluation resulted in audit non-compliances identified against key issue conditions pertaining to local flood mitigation measures as well as proof of inobtrusive lighting and/or nocturnal wildlife light pollution mitigation. As a positive, it is acknowledged that the stormwater design had resulted in 2 large on-site stormwater detention structures and 8 stormwater interceptors to reduce off-site discharge scouring, discharge volume and water quality impacts.

Compliance Status. The SSI project was assessed as non-compliant with the overarching consent condition A1, due to several non-compliances with consent conditions being identified (e.g. urban heat island effects; tree hollow replacement nest boxes; traffic and movement surveillance; and project website maintenance) as well as several planning obligations and/or commitments not being achieved (e.g. increased project footprint / native vegetation clearing and increased Greenhouse Gas emissions during operations).

Notwithstanding, construction compliance was a SSI strength, with the Construction Contractor demonstrating practical knowledge and implementation of consent condition requirements plus exemplary compliance record management. Environment Representative weekly site inspections also evidenced a high standard of construction works compliance.

Environmental Performance. Environmental performance was of commendable high standard as evidenced by compliance records of discharge water quality, sediment control, contamination management, on-site noise monitoring and air quality (dust) monitoring data. However, a non-compliance was raised due to no property noise treatment being provided to mitigate potential construction and operational disturbance. It was also noted that no off-site noise monitoring had been conducted at the noise sensitive receivers, with an operational noise complaint recently received at the time of a Dragway event.

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

2.0 AUDIT BACKGROUND & OBJECTIVES

2.1 Purpose & context

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

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

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

2.2 Project Background

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

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

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

2.3 Audit Objectives

Consistent with the PAR the key audit objectives were to:

- a) assess compliance with the requirements of Project Approval SSI 10048;
- b) assess the project performance of the SSI against the predictions documented in the Environmental Impact Assessment (EIS), including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development;
- c) Verify corrective actions to Audit Findings from the 1st Independent Environmental Audit; and
- d) review the effectiveness of Environmental Management of the SSI.

2.4 Audit Scope

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

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

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

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

2.5 Audit Period

The temporal timeframe subject to assessment during this audit was six (6) months from mid-April to mid-October 2021.

2.6 Terminology & Abbreviations

The following abbreviations and definitions apply throughout this report:

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

3.0 AUDIT METHODOLOGY

3.1 Selection and endorsement of Auditor(s)

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

3.2. Audit Scope development

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

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

3.3. Audit Process and Methodology

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

Audit Scope and Framework were developed (and circulated) based on scope development (above) and Planning Approvals documentation referenced in section 3.4 below. The audit process comprised an off-site desktop review, preparation of an audit information (above), site inspections, and desktop audits with the Proponent and Constructor by MS Teams interview.

The site inspection encompassed the entire project footprint, current works and the so-called Pipeline Park associated with the permanent stockpile. The Environmental Representative virtually attended the first inspection as part of that functions' weekly inspection. A brief offsite verification was also undertaken independently (without project personnel) to observe offsite impacts / controls, plus haulage truck compliance on the public road. The actual audit assessment took place over 2 weeks, comprising the site inspection and 3 audit interview sessions

Some information, feedback and clarifications sessions were undertaken post audit, followed by report drafting and culminating in a closing meeting with the Proponent and Constructor. A peer review of the draft report was also conducted prior to release to the Proponent for accuracy confirmation and commencement of audit action responses.

Lastly, no Auditor requests to observe any area of the project/site were denied nor were there any safety-related risks preventing access.

3.4 Documentation audited

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

Document / Approval	Version
Management Plans & Programs	
Abergeldie Construction Environmental Management Plan	12/01/2021
Abergeldie Construction Traffic Management Sub Plan	Rev F 24/06/2021
Abergeldie Construction Flora & Fauna Management Sub Plan	12/01/2021
Abergeldie Construction Air Quality Management Sub Plan	12/01/2021
Abergeldie Construction Soil & Surface Water Management Sub Plan	12/01/2021
Abergeldie Community Communication Strategy	Rev 3 30/07/2021
Planning Approval documentation	
Environmental impact Statement Volumes 1 and 2	August 2020
Sydney International Speedway Submissions Report	November 2020
Sydney International Speedway Amendment Report	November 2020
EIS Technical Paper 1 - Traffic, Transport and Parking	July 2020
EIS Technical Paper 2 - Noise and vibration	July 2020
EIS Technical Paper 3 - Biodiversity	July 2020
EIS Technical Paper 4 - Air quality	July 2020
EIS Technical Paper 7 - Landscape and Visual	July 2020
EIS Technical Paper 9 - Socio-economic	July 2020

3.5 Auditees and Participation

Audit Attendance Register of Annexure 4 reflects construction contractor's personnel interviewed on site during the audit, including Kelie Pittaway and Brandon Johnston, Abergeldie SIS Environment Manager and Co-ordinator respectively. In addition, the following project personnel were also interviewed:

Name	Organisation	Position
Matthew Marrinan	Sydney Metro	Senior Environment Manager
Lorraine Chirawu	Sydney Metro	Senior Project Manager
Chris Wu	Sydney Metro	Construction Manager
Fee Chemke-Dreyfus	Sydney Metro	Community Place Manager

Lastly, brief discussions were also held with the following stakeholders:

- Priyanka Lakshmaiah, Utilities Manager, Sydney Metro West
- Justine Clarke, Catchment and Asset Protection Adviser, WaterNSW.
- Richard Campbell, Manager Access and Transport Management, Blacktown City Council.
- Judith Portelli, Manager Development Assessment, Blacktown City Council.

3.6 Compliance status descriptors

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

Compliance Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

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

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

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

3.7 Audit disclaimer

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

4.0 AUDIT FINDINGS

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

4.1 Previous audit outcomes

Proponent actions to the initial **IEA recommendations** are summarised below in detailed in the relevant Appendices. Note that Proponent responses (independently report to DPIE required by the PAR) whilst considered did not form part of this audit verification activities.

Condition	ID / Audit Finding and Recommended Action	Target completion	Status or Outcome
A30	NC-01: Independent Auditor not approved prior to commencement → future onboarding process to be improved and communicated to DPIE.	Implemented on new projects	Sydney Metro refuted finding SSI Project Non-compliant
A32	NC-02: Independent Audit report not completed within 2-month deadline → Sydney Metro to commit to / facilitate future Audit Planning process.	2 nd Independent Audit	Process implemented, and deadline achieved
A35	NC-03: Non-compliances not notified to the Planning Secretary within 7-days of detection → ensure stakeholders are aware of notification obligations	Implement ongoingly as required	Issue observed to continue Sydney Metro differs in interpretation of condition Remains SSI Non-compliant
B6 (e) & (f)	NC-04: Required documents not published on the project website → practical process to trigger and report on website to be implemented.	Implement ongoingly as required	Issue observed to continue Remains SSI Non-compliant
C7	NC-05: F&F Management Plan required hollow replacement nest boxes not implemented → provide nest boxes in 3 for 1 replacement ratio	July 2021	30 nest boxes provided early October 2021 COMPLETE / COMPLIANT
E15	NC-06: Stormwater design information did not demonstrate that flooding performance objectives would be achieved during operations → conduct modelling, computation or equivalent to confirm as-built performance capability	Prior to works completion	Sydney Metro maintained the design complied, but was still unable to prove it quantitatively SSI Project Non-compliant
E35	NC-07: Initial stockpile design did not adequately address stability or potential soil and drainage issues → provide a compliant final design	Prior to handover / operation	3-D model updated and construction incl. compaction testing and survey being implemented PROGRESSING
A50	NC-08: No formal design and construction assurance plan for the Permanent Stockpile to address surface water run-off to the Warragamba Pipeline → provide and implement a compliant final design	Prior to handover / operation	As above, incl. construction and landscaping plans and testing being implemented. PROGRESSING
TTP4 (REMM)	NC-09: Scheduling of additional spoil haulage trucking to minimise peak period impacts had not been addressed → implement a protocol to manage Spoil Haulage movements	Implement ongoingly as required	Peak movement ramp-up and close-down protocol implemented and evidenced COMPLETE / COMPLIANT

4.2 Compliance performance summary

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

Consent Condition	STATUS		
	Total	Not triggered	Non-Compliant
Part A Administrative Conditions	37	16	3
Part B Community Information and Reporting	6	1	1
Part C Construction Environmental Management	13	0	1
Part D Operational Environmental Management	15	15	N/A
Part E Key Issue Conditions	51	10	4
Revised Environmental Mitigation Measures²	52	5	3

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

Note 2: Totals applicable to commitments assessed only, not the entire suite of 58 documented REMMs.

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

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

4.3 Summary of non-compliances

Key Audit Findings identified during this audit and classified as non-compliances are summarised below, with additional details found further in Recommendations section 5.1 and relevant Appendices:

NC-10 A number of Terms of Approval, plus EIS obligations and commitments had not been achieved, this based on as-built outcomes or project records - Consent condition A1

NC-13 There was limited evidence of standards and guidelines for unobtrusive lighting and nocturnal wildlife lighting pollution protection being adequately considered in the lighting design input, and/or proof of SSI performance outcomes being achievable - Consent condition E42

NC-14 The design (and built development) did not minimise Urban Heat Island effects, instead substantially increased impervious surfaces. Shade trees or low heat absorbing surfaces were also not provided in car parks - Condition E44

4.4 Development Impacts (actual / potential v predicted)

An assessment of **compliance** between **actual** and **predicted impacts** documented in the EIS documents reference in condition A1 was undertaken, and as required by the PAR, this included a comparison with the approved boundary and an assessment of potential off-site impacts. A summary of this assessment is reported below, firstly from a design perspective (resulting in several as built impacts) and secondly of impacts resulting from construction works not directly related to the design.

4.4.1 Design & development impacts

Whilst operational impacts of the development will only manifest during infrastructure operations and motorsport events in 2022 and beyond, it was assessed that the design and as built has, and will, lead to more impactful or adverse outcomes than that predicted, as summarised below:

Development footprint

- Approximately 12% larger than the EIS stated "footprint of about 21 hectares" at 235,000 m² (23.5 ha) - Evidenced cited in Appendix A, Condition A1.

Urban heat island effects

- Urban heat island effects would be exacerbated due to:
 - Sealing of over 130,000 m² of previously pervious area as asphalted car parks – evidenced in Appendix E, Condition E44
 - Approximately 45% fewer "replacement" trees than "over 1,000" stated in the Submissions Report
 - No shade trees (or turf) was utilised in carparks as stated in the EIS, noting no proof of consideration of this or low heat absorbing surfaces as required by REMM LV2 (Appendix F)

Green House Gases / Sustainable energy usage

- It was noted although somewhat irrelevant to the sustainability commitment above, that a project Consistency Assessment computed that the EIS had significantly over-estimated the total power required for carpark lighting, with the greenhouse gas inventory recalculated as being 92% lower at 5,255 MWh or around 4,700 tCO₂ e over a 50-year operational timeframe
- Unless renewal energy arrangements were employed by motorsport operators, there would be increased GHG impacts for carpark lighting over that predicted, given:
 - 100% solar powered carpark lighting was no longer provided, this reduced to around 10% (582 MWh or around 560 tCO₂ e over the 50-year lifetime)
 - No battery storage/backup arrangements were provided
- Given the above, it was noted that stated EIS commitments of avoiding potential emissions of about 60,000 tCO₂ e over the life of the project and reducing GHG emissions by 63% over 50 years operation was inaccurate and misleading
- Overall, reduced solar carpark lighting plus Speedway Garage solar array was claimed to offset 7,475 tCO₂-e or approximately 21% of the estimated total greenhouse gas emissions generated over the life of the project.

Light pollution

- There is potential for neighbouring residents plus nocturnal bird and bats known to utilise Prospect Nature Reserve and Forest Woodland adjoining the SSI to be impacted, especially given repurposed carparks and operational areas, for example:
 - Fewer, brighter carpark lights predominantly perimeter-located as opposed to evenly spread within the parking area
 - Higher light poles (some of 8 and 10m height) to achieve required illuminance and/or address safety concerns at furthest reach could create increased night glare impacts on closest residences and light spill impacts on nocturnal fauna
 - Specified luminaires, some exceeding 500W LED Power and 63,000 lumens, did not appear to comply with National Light Pollution Guidelines for Wildlife (Commonwealth of Australia 2020) given short wavelength blue light emissions, which scatter more readily than long wavelength light, contributing more to sky glow and also being more detrimental to animal circadian rhythm
 - Similarly the Light Pollution Guideline best practice principals with that of low light poles – noting high poles to be used by the SSI as above.

Visual amenity impacts

- Soft landscaping and tree planting particularly in the Speedway precinct had the potential to mitigate visual impacts once species had grown to maturity.
- Additional native vegetation clearing associated with stormwater batter chutes evidenced in Appendix G, photograph 3, would impact visual amenity for some years. The Sydney Metro Consistency Assessment claimed no visual impacts, with amenity observed from Viewpoint 4". The IEA noted this oblique viewing perspective as non-representative.
- Dragway carparking areas would continue to be visually impactful when viewed from Ferrers Road and the main entrance to Sydney Motorsport Park and Sydney Dragway (EIS Viewpoint 2) not utilising dense endemic vegetation to hide a 500m section of terralink walls on the north and western sides of Carparks D1 and D2, noting EIS s5.5.2 Table 5.4 claimed Project Consistency with the Western Sydney Parklands Urban Design Manual, version 2, 2018 below:

Planting and landscape

- The use of endemic Cumberland Plain species would be the predominant planting palette across the Parklands
- Generally, tree canopy planting to carparks is to be mixed Cumberland Plain species and should provide a visual buffer to expansive areas of carparking
- Planting shall be provided along the perimeter of asphalt areas and in generously sized planting islands
- Carparking areas would be surrounded with endemic vegetation planting as part of the project landscape design, selected from the list of endemic species within the Western Sydney Parklands Design Manual
- Where possible the carparking spaces and spectator seating would have turf and permeable surfaces as an alternative to hardstand and dark surfaces.

Operational impacts

- There is potential for neighbouring residents and stakeholders to be impacted by increased occurrences of noise and light pollution over that predicted given:
 - Carparks had been repurposed to facilitate other motorsport related events, which appears contrary to EIS and Submission / Amendment Report statements of “dedicated parking” and “available for use by other motorsport operators by agreement”
 - A change of operational curfew to 11pm was planned and being assessed.

4.4.2 Construction impacts

In summary, SSI project predictions around construction air / water / noise / sediment impacts described in the various chapters of the Environmental Impact Statement was assessed as being similar to actuality, but with a few exceptions indicated further:

Native Vegetation clearing (endangered ecological communities)

Native vegetation clearing additional to that predicted was motivated through a Consistency Assessment citing safety issues relating to stormwater batter chute construction, this reflected in the initial IEA Report dated 30-06-21, with actual clearance surveys noting additional impacts as follows:

- 1,299 m² of additional Plant Community Type 849 and 850 vegetation clearing, totalling 4,342 m² and representing an approximate 15% increase in clearing of Threatened Ecological Community (TEC) Cumberland Plain Woodland over predictions in the revised Biodiversity Assessment Report associated with the SIS Amendment Report,
- Impact on Southern Myotis (threatened species) with 157 m² foraging habitat cleared

Offsite traffic impacts (spoil haulage/removal)

With respect to spoil generation, the EIS indicated that some 100,000 m³ of excess cut material would either be used on site for fill, the remainder becoming an approved permanent landscaped stockpile, with 1-way movement on public Ferrers Road limited to around 500m distance. Unsuitability as engineering fill and required permanent stockpile volume limitations resulted in increased haulage over that predicted however, details summarised as follows:

- Recalculations of the predicted earthworks volumes were that approximately 25,000m³ more spoil would be generated than predicted in the EIS, and 109,000m³ greater than estimated in the SIS Amendment Report
- A revised Construction Traffic Management Plan indicated 13.920 Truck & Trailer movements (up to 300 per day) as opposed to the SIS Amendment Report count of 95 vehicles,
- Over 816 outward bound earthworks movements were recorded over a peak 2-month period amounting to over a 10-fold increase on Amendment Report totals and at least a 40% increase on EIS predictions of 592 vehicles in total.
- Assuming a 40km round trip to Erskine Park, there would be over 3.200km of additional traffic, road and/or community impacts over that predicted.

Air Quality / dust impacts

- Construction air quality/dust impacts evidenced reasonable compliance with adopted and/or EIS performance predictions with Quarterly Air Quality Monitoring Reports evidencing:
 - Particulates such as PM_{2.5} trending between 2 - 14 $\mu\text{g}/\text{m}^3$ and PM₁₀ between 2 - 17 $\mu\text{g}/\text{m}^3$
 - There were only a few exceedances of adopted level triggers, with one event in July resulting in a complaint.
 - Deposited dust levels of between 4.9 and 6.8 $\text{g}/\text{m}^2/\text{month}$ were slightly above expected levels of 4.0 $\text{g}/\text{m}^2/\text{month}$
 - No dust data was collected and/or available beyond the project boundary given low predicted offsite impacts.

Water Quality impacts

- Water Quality data was comparable to baseline data collected immediately prior to construction commencement

Noise impacts

- Whilst there were no construction related was complaints during the audit, there had not been much noise monitoring (IEA **observation** further)

4.5. Environmental Management Performance

4.5.1 Regulatory notices, penalties or prosecutions

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

4.5.2 Stakeholder feedback, complaints, and incidents

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

With respect to [Stakeholder Consultation](#) required by the PAR, there were five (5) responses to solicited requests for input into the audit process.

DPIE indicated an interest in actual versus predicted project impacts, as well as previous Independent Environment Audit Report findings and recommendations relating to biodiversity and native vegetation clearing, detailed design assurance, spoil haulage and road network performance, and monitoring program outcomes.

WaterNSW reiterated their prior PAR response regarding submissions made during the EIS consultation period and informing the subsequent SIS Amendment Report. Additionally, unavailability of the initial Independent Environment Audit Report on the website was questioned. WSPT did not have any specifics, but also questioned the unavailability of the initial Independent Environment Audit Report on the website.

Blacktown City Council indicated interest with general compliance to the Protection of the Environment Operations Act. Brief discussions with senior management indicated satisfaction with traffic-related aspects to date, concern with potential operational car parking limitations, potential flood hotspots and a frustration with the quantum of infrastructure development requiring attention by limited internal resources. Sydney Water indicated interest in compliance with their drainage system standards (Condition E49) but in subsequent discussions this materialised as not being applicable to this development.

And finally, with respect to lagging indicators of project performance, there had been no significant [incidents](#) and only 2 reported [complaints](#) during the temporal audit timeframe defined in section 2.5 previously, with this audit not detecting any information to the contrary. Complaints concerned silt tracking on the public road (EPA/anonymous) and a single dust issue (Dragway Operator). Both were seen to be promptly and ongoingly actioned and managed respectively.

4.5.3 Document adequacy & implementation

The initial Independent Environment Audit Report assessed documentation adequacy; these documents mostly unchanged in the last six months.

These Management Plans were assessed as continuing to be implemented around dust mitigation, surface water and ERSed management, asbestos / contamination issues and environmental management system requirements.

4.5.4 Key Strengths

The project continued to be resourced by experienced environment practitioners, who, like the Environment Representative and Site Superintendent were very practical and hands-on. Inevitable glitches and control / mitigation measures requiring maintenance or enhancement were sighted to be promptly and formally acted upon.

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

- Real-time "Site Hive" IT solution used for dust particulate and noise monitoring
- Performance outcomes regarding erosion and sediments controls, discharge water, noise and air quality (dust) compliance
- Waste / Resource recovery performance
- Construction Contractor compliance record management
- Effort, resourcing and implementing required practices for ongoing asbestos finds, as well as emerging contamination being monitored and quantified
- Proponent engagement with numerous stakeholders including council and motorsport operatives and administrators

4.5.5 Improvement Opportunities

Whilst several Improvement Opportunities were identified during the audit, these are not documented given the proponent and contractors previous inaction and responses to improvement opportunities identified in the Initial Independent Environment Audit Report.

Refer to section 5.4 further regarding Remaining Improvement Opportunities for the record.

4.6 Site inspection

The project works, development footprint and selected perimeter components were physically inspected during site walks accompanied by the contractor's Environment Manager, Environmental Coordinator and Site Superintendent. Two (2) separate inspections were conducted on differing days given Covid-19 protocols at the time. Additionally, an off-site inspection was conducted at the end of the first verification, being independently undertaken (without project personnel) to observe offsite impacts / controls, plus haulage truck compliance on the public road.

Whilst Carpark C had been asphalted, Dragway car parks were nearing final levels, with activity at the time concerning contamination segregation and haulage truck loading. The Speedway track, grandstand and associated infrastructure was being built.

In summary, the site presented very well on both days, the first somewhat windy and the second day quite muddy after a significant rain downpour the prior day. Resulting potential for dust and off-site sediment discharge respectively were observed to be controlled and negligible.

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

- Dust suppression achieved through use of water carts based onsite, REMM AQ1;
- Street sweeping of public Ferrer Road;
- Signage and bunting around tree and vegetation protection zones, REMM LV5;
- Concrete waste sumps, REMM SSW8 and Waste Segregation REMM WM3;
- On-site parking for construction personnel, REMM TTP5;
- Non-tonal reverse quackers used on movable plant and equipment;
- Active supervision and assessment and segregation of asbestos-containing material by a specialist service provider, Photograph 8;
- Good water quality clarity of a nearby (off-site) pond sourcing from SSI site catchment, Photograph 4;
- Haulage trucking utilising covered loads, proceeding south along Ferrers Road, and not shortcutting to M7 at the Chandos Street roundabout;
- Construction traffic-related signage on Ferrers Road;
- Project signage along selected fences and at entry / exit gates;

Two Traffic Management Plan breaches were observed leaving Gate 4, refer to Non-compliance (NC-11) section 5.1 further plus Photographs 1 and 2.

Otherwise and further to the above, photographic evidence of selected observations are found in [Appendix G further](#), and where applicable, added to compliance notes in the Appended Audit Findings tables.

5.0 RECOMMENDATIONS

As required by the PAR, Audit Findings and/or Recommendations to the identified Non-compliances (below) are to be addressed in a separate documented Proponent Audit Action Plan to be tabled by Sydney Metro with the Planning Secretary.

5.1 Non-compliances

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
			NON-COMPLIANCES WITHIN CURRENT AUDIT PERIOD:	
NC-10	A1	Terms of Approval: The Proponent must carry out the SSI in accordance with the terms of this approval and generally in accordance with the Environmental Impact Statement, Submissions Report and Amendment Report	<p>Several consent conditions, obligations and commitments had not been achieved or demonstrated, the quantum hereof collectively deemed to constitute a SSI non-compliance based on built and formal evidence / records (or the absence hereof).</p> <p><i>Substantiating evidence cited in the body of <u>this</u> report includes but is not limited to the following:</i></p> <p><u>Terms of approval (non-compliances)</u></p> <ul style="list-style-type: none"> Consent condition non-compliances relating to traffic & transport (C7), property noise treatments (E30), heat island effects (E42), wildlife light pollution guidelines (E44), nest box implementation strategy (C7), flooding performance compliance evidence (E15) and website maintenance (B6) <p><u>EIS / Amendment Report</u></p> <ul style="list-style-type: none"> Increased construction project footprint, increased native vegetation clearing and increased off-site spoil movements. Significant change to 100% solar car park lighting and 1,000+ tree planting commitments Carparks had been designed to be repurposed for additional but alternative uses (event staging) Potential change to the 10pm operational curfew were being progressed. 	<p>It is recommended that Sydney Metro conduct a Post Completion Lessons Learnt workshop to identify and improve EIS, design management and delivery process weakness and failings.</p> <p>Furthermore it is suggested that workshop outcomes including lessons learnt and corrective actions are captured and managed through the Sydney Metro 3rd Party Certified Management System.</p>

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC-04	B6 (e) & B6 (f)	Information: A current copy of each document required under the terms of this approval to be published on the SSI project website within one week of its approval, or before commencement of any work to which they relate or before their implementation.	<p>Previous Non-compliance (issue) observed to continue:</p> <p>Sydney Metro action and response to Audit Finding of the initial IEA Report of 30-06-21 had proven be ineffective, the non-compliance continuing and remaining, this time including:</p> <ul style="list-style-type: none"> The initial SIS Independent Environment Audit Report was 13 weeks late, requiring prompting from external stakeholders before uploading. Quarterly Environmental Monitoring Reports took some weeks to upload post internal finalisation 	Refer to NC-04 recommendation in the OPEN Non-compliances section further
NC-11	C7	The CEMP and Sub-plans (Traffic Management Plan) including any amendments approved by the ER must be implemented for the duration of construction.	<p>There were limited compliance records to demonstrate the (300+ page) Construction Traffic Management Plan was routinely implemented as documented, including but not limited to specified daily observations; weekly and night-time inspections; internal and external audits; plus reporting of monthly monitoring results.</p> <p><i>Also, contravention of Vehicle Movement Plan requirements for no right turning when exiting site through the southern gate into busy Ferrers Road was observed during the IEA site inspection – the contractor promptly initiated administrative and physical measures (sighted later during this audit) to prevent recurrence.</i></p>	<ol style="list-style-type: none"> 1) Implement regular and routine compliance inspections as required by the CTMP. 2) Conduct a targeted risk-based audit (not document review) in the next month before project completion 3) Routinely provide results of monitoring to the Environment & Approvals weekly meeting.
NC-12	E30	Operational noise mitigation measures must be implemented within three (3) months of the commencement of construction to minimise construction noise impacts to impacted receivers identified in the SSI Noise and Vibration Impact Statement.	<p>Whilst enabling steps had been completed, at-property treatment had not been completed within 6 months of the approval deadline, noting also that the project was nearing completion with motorsport events scheduled in anticipation hereof.</p> <p><i>The Independent Auditor continues to maintain that Condition E30 has a binary either achieved or not outcome, irrespective of related but stand-alone administrative requirements around justifications for alternatives.</i></p> <p>Refer to Observation section 5.2 further, noting: <i>It was also observed that no sensitive receiver property noise monitoring records were provided to demonstrate claimed low-impact construction activities, this also a recent recommendation by the noise specialist consultant.</i></p>	It is recommended that Sydney Metro conduct a Post Completion Lessons Learnt workshop to identify processes to improve mobilisation processes in delivering timely and tangible community impact mitigation measures and obligations.

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC-13	E42	<p>The SSI must be constructed and operated with the objective of minimising light spill to surrounding properties and effects on foraging behaviour or flight paths of nocturnal bird and bats known to utilise Prospect Nature Reserve.</p> <p>All lighting associated with the construction and operation of the SSI must:</p> <ul style="list-style-type: none"> be consistent with the requirements of: AS/NZS 4282:2019 - Control of the obtrusive effects of outdoor lighting give consideration to the National Light Pollution Guidelines for Wildlife (Commonwealth of Australia 2020). <p>Additionally, the Proponent must mitigate residual night lighting impacts to protect existing or approved properties adjacent to the SSI and must consult with affected landowners.</p>	<p>There was limited evidence to demonstrate that lighting designs achieved required outcomes and performance in terms of minimising impacts in the context of environmentally sensitive areas, specifically</p> <p>Consistency with AS/NZS 4282:2019 (obtrusive effects)</p> <ul style="list-style-type: none"> Electrical Designer Certifications were confined to safety related AS 3000:2018 Electrical Installation (Wiring Rules) and Outdoor Car Parks Lighting Subcategories of AS 1158.3.1:2020 No evidence could be provided of any AS/NZS 4282 requirements being specified as design inputs, including: <ul style="list-style-type: none"> Section 3.2: Limits for Light Technical Parameters Section 3.3: Assessment of Conformance Design, Installation, Operation & Maintenance (Appendix A) Design performance data was confined to confirmation of Environmental Zone A3 - Medium District Brightness (suburban) limits ULR (UWLR) ≤ 0.02 Determination of Illuminance, Intensity and Luminance was limited, and when provided, output calculations did not reference acceptance criteria, also noting that "discomfort glare had not been assessed for the luminaires" Acceptability of predicted light contours values in sensitive ecological areas in context of the Guideline below had not been recorded as a compliance record The Electrical Designers Certifications did not include AS/NZS 4282 <p>Consideration of Commonwealth Light Pollution Guidelines for Wildlife</p> <ul style="list-style-type: none"> No audit participant was aware or had any knowledge of the Light Pollution Guidelines for Wildlife No evidence could be provided of the Light Pollution Guidelines for Wildlife best practice principles being a design input No review evidence was provided of consideration and selected best practice principles (or otherwise) such as reduced light pole height and avoiding blue light spectrum detrimental to animal circadian rhythm. <p>Consult with affected landowners to minimise night lighting impacts</p> <ul style="list-style-type: none"> No evidence was provided of consultation with landowners potentially impacted by residual night lighting. <p>Refer also to commentary in section 4.4.1 on Light Pollution, and Appendix E (E42) for more details</p>	<p>It is suggested that Sydney Metro Delivery conduct a Post Completion Lessons Learnt workshop to identify and improve the design management process including evidentiary failings.</p> <p>Furthermore it is recommended that:</p> <ol style="list-style-type: none"> 1) A Compliance Evaluation Report be compiled for project approval compliance close-out, correlating the various lighting system designs and as built infrastructure with AS/NZS 4282 specifics 2) A Compliance Review Report be compiled for project approval compliance close-out, demonstrating consideration of best practices, compliance herewith and/or formal justifications for not adopting National Light Pollution Guidelines for Wildlife 3) In the absence of consultation having been undertaken, compile an official project approval closeout record as defensible evidence against potential future complaints and claims by existing or future property owners.

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC-14	E44	<p>Urban Heat Island Effects and Sustainability.</p> <p>The Proponent must ensure that the SSI design:</p> <ul style="list-style-type: none"> minimises the increase in impervious surfaces, maximises shade to avoid heat island effects; and minimises impacts to visual amenity. 	<p>Urban Heat Island effects will be exacerbated by the design and SSI development once completed and operational, specifically including but not limited to the following:</p> <p>Increasing impervious surfaces - to be minimised</p> <ul style="list-style-type: none"> Over 130,000 m² of previously permeable areas had been maximised into asphalted car parks Other than some turf in the public / competitor Speedway precinct, no soft treatments had been incorporated into the above-mentioned car parks <p>Shade provision - to be maximised</p> <ul style="list-style-type: none"> Approximately 45% fewer “replacement” trees than the “over 1,000 trees” stated in the Submissions Report No shade trees provided within above-mentioned asphalted car parks Canopy trees mostly replaced like-for-like shaded areas, with limited new shading provided <p>Visual amenity - impacts minimisation</p> <ul style="list-style-type: none"> Reduction in use of trees and vegetation as alluded to above will increase, not minimise, visual impacts Dragway carparking areas would continue to be visually impactful when viewed from Ferrers Road and the main entrance to Sydney Motorsport Park, not utilising dense endemic vegetation to hide some 500m of terralink walls on the north and western sides of Carparks D1 and D2, being an EIS commitment to address Western Sydney Park/lands Urban Design principles Refer also to commentary in section 4.4.1 on Visual amenity impacts 	<p>It is recommended that Sydney Metro conduct a Post Completion Lessons Learnt workshop to identify and improve EIS, design management and delivery process weakness and failings.</p> <p>Furthermore it is suggested that workshop outcomes including lessons learnt and corrective actions are captured and managed through the Sydney Metro 3rd Party Certified Management System.</p>
NC-15	LV1	<p>Opportunities to minimise the area of vegetation clearance and for the retention and protection of existing street trees and trees within the project site would be identified</p>	<p>No evidence (proof) was provided of any construction planning process or workshops to demonstrate vegetation clearance options being considered, noting:</p> <ul style="list-style-type: none"> Section 4.4.1 of this report reflects more native vegetation clearing and that protected. 	<p>Recommendation as above.</p>

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
		during detailed construction planning.	<ul style="list-style-type: none"> As a positive, some stormwater design routing had been changed in reality to divert around protected areas. 	
NC-16	LV2	Opportunities for the incorporation of trees and low heat absorbing ground surface finishes in carparking areas using that would be identified and implemented where feasible and reasonable.	<p>No heat absorbing ground surfaces were provided in any of the car parking areas, neither were trees incorporated - refer also to E44 above).</p> <ul style="list-style-type: none"> As alluded to in NC-11 above (Consent condition A1) above, one of the contributing factors appeared to be due to carparks being repurposed to accommodate alternative operational / commercial uses (event staging) 	Recommendation as above.
NC-17	B1	Opportunities to minimise the amount of vegetation clearance within the project site would be considered as part of further design development where feasible and reasonable.	<p>No evidence (proof) was provided of any design development reviews or workshops to demonstrate vegetation clearance options being considered, noting:</p> <ul style="list-style-type: none"> Some stormwater design routing had been changed to divert around protected areas Section 4.4.1 of this report reflects more native vegetation clearing and that protected. 	Recommendation as above.
			NON-COMPLIANT SINCE 1ST INDEPENDENT AUDIT:	
NC-01	A30	SUBMISSIONS & APPROVALS: Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<p>(Project) non-compliant:</p> <p>To meet PAR audit frequency requirements, <u>this</u> Independent Audit was obligated to commence whilst Sydney Metro were still awaiting formal Planning Secretary endorsement of the nominated independent auditor.</p> <p>It should be noted that the Independent Auditor was endorsed by DPIE for the Sydney Metro City & South West SSI project, however.</p>	It is recommended that Sydney Metro adopt at least a three-month timeframe for onboarding future Independent Auditors. To facilitate closure of <u>this</u> Audit Finding it is suggested that Sydney Metro provides the Planning Secretary with an assurance that the SIS learning would be applied to future Sydney Metro projects.
NC-03	A35	The Planning Secretary must be notified in writing via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance.	<p>Non-compliant (issue) continued:</p> <p>Sydney Metro continue to maintain alternative interpretations to non-compliances and consequently these are not being formally notified to the Planning Secretary. <i>As example, the Independent Auditor continues to maintain that Condition E30 required "at-property noise treatments" not being provided within 3 months of construction commencement (or subsequently) is non-compliant.</i></p>	Ensure that project stakeholders are aware of non-compliance notification obligations (as is the case for incidents).

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC-04	B6 (e)	INFORMATION: A current copy of each document required under the terms of this approval to be published on the SSI project website within one week of its approval, or before commencement of any work to which they relate or before their implementation.	Non-compliant (issue) continued: <i>Sydney Metro action and response to Audit Finding of the initial IEA Report of 30-06-21 have proven be ineffective, the non-compliance continuing and remaining, this time including:</i> <ul style="list-style-type: none"> <i>The initial SIS Independent Environment Audit Report was 13 weeks late, requiring prompting from external stakeholders before uploading.</i> <i>Quarterly Environmental Monitoring Reports took some weeks to upload post internal finalisation</i> <u>Audit Finding of the initial IEA Report of 30-06-21:</u> Condition E27-required Construction Noise & Vibration Impact Statement dated December 2020 was not published on the Sydney International Speedway project website before commencement of work. Whilst a single omission, this was undetected and non-compliant for some months, noting also that there were other Planning Approval required Compliance Reports and the Air Quality Monitoring Report requiring imminent publishing post-audit.	Sydney Metro and the Construction Contractor implement a practical and visible process to: <ul style="list-style-type: none"> Trigger the need for document updates, and Report on upload dates and compliance with B6 in its entirety.
NC-06	E15.	FLOODING ISSUE: Detailed design of the SSI to maintain or improve flood characteristics i.e. <ol style="list-style-type: none"> maximum increase in inundation levels upstream of the SSI of 50 mm in a 1% AEP rainfall event; no increase in flood inundation levels in the Warragamba Pipelines corridor; a maximum increase in inundation time of one hour in a 1% AEP rainfall event. 	(Project) non-compliant: No detailed project design performance data could be provided to evidence that flood mitigation measures satisfied flood performance objectives and outcomes during the operation of the Speedway i.e. would be achieved. <i>As context it should be noted that the SIS Amendment Report indicated the amended design would have potential to increase flood levels for short periods upstream of the culvert underneath Ferrers Road between Carpark C and D during the 1% AEP flood event.</i> Refer to Appendix E (E15) for more details	Sydney Metro to provide a detailed and verifiable project design that specifies "off-site" stormwater arrangements to be constructed to mitigate flooding impacts, including that of Ferrers Road and the Warragamba Pipelines corridor. Modelling, computations or equivalent to unequivocally demonstrate consent condition performance requirements should also be undertaken and retained as project compliance records.

5.2 Observations

- 1) It was noted that the replacement Community Place Manager was unable to utilise Consultation Manager which compromised information capture and retrieval, and that this person was leaving the project before completion of this report. ConMan skill set (or absence thereof) and/or replacement person was unknown.
- 2) No attended noise monitoring records at Chandos Road sensitive receivers were provided to demonstrate claimed low-impactful construction activities, the SLR Noise assessment report of May 2021 recommending this be undertaken especially of high intensity works.

5.3 Proponent response to draft Independent Audit Report

As permitted by PAR section 4.3.1, the Proponent provided a response to the draft Independent Audit Report prior to finalisation. Readers of this report should note that this feedback is different to the separate Proponent Audit Action Plan to be tabled by Sydney Metro with the Planning Secretary being required by PAR 4.3.2.

Whilst the review and feedback was appreciated, the auditor noted the response mostly provided commentary with no new or additional information, or evidence, or error of fact.

Again, as required by the PAR 4.3.1**, the following provides a record of the Auditor's view in relation to the response provided by the Sydney Metro Delivery Director.

Reference	PROPONENT commentary	AUDITOR's View **
	<u>Regarding compliance with consent conditions, EIS and SIS Amendment Report:</u>	
A1	<i>All were subject to consistency assessments, determined as consistent with the EIS.</i>	Audit finding remains - Consistency Assessment evidence was cited (covered in A2) and deemed to be generally compliant. <u>This</u> A1 audit finding relates to the total number of non-compliances raised (17) plus several (material) EIS / Amendment Report commitments which were not achieved.
	<u>Regarding consent condition to minimise light spill effects on nocturnal bird and bats:</u>	
E42	<i>Change "no evidence" of Commonwealth 2020 National Light Pollution Guidelines for Wildlife" certification to "limited"</i>	Wording clarified, but audit finding remains - evidence cited / provided only demonstrate Lighting Design Certifications to AS/NZ 1158 which human safety related, not wildlife focussed.
	<u>Regarding consent condition to minimise impervious surfaces (to avoid heat island effects:</u>	
E44	<i>Parking areas are consistent with the EIS and are appropriate to the size of the Speedway and Dragway venues. Hard-stand parking is necessary to meet parking demand from capacity and durability perspectives. The parking design concentrates parking in appropriate areas, retaining the valuable Cumberland Woodland unaffected.</i>	Noted, but audit finding remains – Sydney Metro EIS and resulting commitments to stakeholders enacted through consent conditions require minimisation of heat island effects specifically those of impervious surfaces. The IEA noted at the audit debriefing that commercially available permeable treatments might have been specified if and where car parking areas were used for car parking not other purposes.

Reference	PROPONENT commentary	AUDITOR's View **
	Regarding IEA statement around (no) evidence of detailed construction planning concerning opportunities to minimise the area of vegetation clearance	
REMM LV1	Change 'no' to 'limited evidence', noting additional clearance for batter shoots was assessed as consistent with the Approved EIS.	Audit statement remains – the Consistency Assessment only spoke to a fraction of the clearing, with no construction details tabled as proof. Refer to Appendix F - LV1 for more details
	Regarding IEA statement about limited shade provided (to avoid heat island effects):	
E44 & REMM LV2	Noting the Speedway and Dragway events take place predominantly at dusk and night, shading is not required.	Audit finding remains With respect, the concept of built infrastructure heat island effects is clearly not understood.
	Regarding initial Audit Finding Non-compliance about flooding impacts:	
E15 b	Re no increase in flood inundation levels in the Warragamba Pipelines corridor - Analysis was undertaken for the permanent stockpiles in the design and within the consistency assessment and can be provided, again I think the use of 'insufficient evidence' would be more appropriate	Audit finding and statement remains - no analysis was provided and/or verified by the Proponent as misinterpreted or missing or different to that cited as "Collected Evidence".
E15 c	Re maximum increase in inundation time of one hour in a 1% AEP rainfall event - Onsite detention addresses inundation time, again I think the use of 'insufficient evidence' would be more appropriate	Audit finding and statement remains - provision of onsite detention infrastructure without performance calculations and/or inundation duration time predictions confirming required outcomes is meaningless. As indicated in s5.1 earlier, the SIS Amendment Report indicated there would be an increase to existing flood levels for short periods upstream of the culvert underneath Ferrers Road between Carpark C and D. The design does not answer to specified flood depth and durations.

Note – response received only related to Audit Finding Appendices, not the body of the report sections from Executive Summary to Recommendations.

Other commentary including suggested minor word changes received were reviewed, and apart from acknowledging Covid-19 related delays, most were considered to offer no new or additional information, or evidence, or error of fact to the content and/or evidence cited (or absence thereof). Consequently, these have not been replicated in the table above, nor Proponent comments incorporated on prior audit findings (other than above) with respect to initial audit non-compliance wording extracted from the initial Independent Audit Report finalised six months prior.

Given the above, and experience with some Proponent functions during both audits, it is the opinion of the Auditor that some Sydney Metro functions:

- Do not understand the concept of documented proof of compliance. *Unqualified documents, verbal statements and/or commentary were often proffered.*
- Were unaware of certain sustainability and conservation principles.

Consequently it is **recommended** that project delivery and designer training be provided moving forward to facilitate proactive implementation of, and compliance with, EIS and Planning Approval obligations and commitments to the Community and other Stakeholders including those representing the natural environment.

5.4 Remaining Improvement Opportunities (initial audit)

Only 3 of the ten (10) identified Improvement Opportunities / Observations had been satisfactorily addressed i.e.

- IO-1 re Final Post Vegetation Clearance survey
- OBS-2 re ER Monthly Reports
- OBS-2 re GHG performance prediction

Others below were not addressed and/or satisfactorily progressed:

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
IO-2	CoA C1	Environmental Audits. The Construction Environmental Management Plan (CEMP) to ensure that performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 are implemented and achieved during construction.	Observation / Improvement: Environmental Audits required by CEMP s5.4 had not been conducted by the Contractor, neither was a Project Audit Schedule developed. This's	Improvement Required: Implement. Update October 2021 – document reviews undertaken, but not any audits per se
IO-3	CoA C9	Monitoring Plan. Construction Monitoring Programs must provide: a) details of baseline data available; b) details of baseline data to be obtained and when.	Observation / Improvement: The Monitoring Plan component of the Construction Soil & Surface Water Management Sub Plan did not clearly detail how a representative <u>baseline</u> would be established beyond the single site selection and a single water quality sample undertaken just prior to construction commencement.	Improvement Required: Address and implement.
IO-4	CoA C9 (g) CoA A1 EIS	AQ Monitoring Plan Reporting The Proponent must carry out the SSI (generally) in accordance with the Sydney International Speedway Environmental Impact Statement.	Observation / Improvement: Construction Air Quality Management Sub Plan Tables 6 and 7 Air Quality Indicator values differ to that predicted in the EIS tables 9.4 to 9.7.	Improvement Required: It is suggested that AQ indicators and predicted outcomes are more clearly defined in the CAQMP Sub plan and/or comparisons between elected and predicted values evidenced in Quarterly Air Quality Monitoring Reports stated to be publishable on the project website.

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
IO-5	CoA E51	<p>Water issue: Should damage to the Warragamba pipeline corridor or associated bulk water supply infrastructure occur as a result of the construction of the SSI, the Proponent must either (at the landowner's discretion):</p> <ul style="list-style-type: none"> (a) compensate the landowner for damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-construction. 	<p>Observation / Improvement:</p> <p>Whilst the Construction Contractor was aware of Condition E51, and this responsibility was identified in a Compliance Obligations Spreadsheet, the executed version of Schedule 20 to the Sydney Metro contract appeared to have missed this obligation.</p>	<p>Improvement Required:</p> <p>Confirm that accountability obligations for identified WaterNSW infrastructure damage have been contractually formalised with the Contractor, including a liabilities period.</p>
IO-6	REMM SSW5	<p>Onsite surface water monitoring</p> <p>An <u>onsite</u> surface water monitoring program to be implemented to observe any changes in the quality of runoff from the project site prior to discharge.</p>	<p>Observation / Improvement:</p> <p>The Construction Soil & Surface Water Management Sub Plan did not provide detail of an onsite surface water monitoring program in the Monitoring Plan component of the CSSWMP, only a commitment that visual observations would be conducted during rain events at off-site locations identified in figure 5.</p>	<p>Improvement Required:</p> <p>Implement and collect records from identified off-site locations during rainfall events.</p>
IO-7	N/A	<p>Compliance records</p> <p><i>No specific consent requirement -audit observation related to compliance assurance facilitation and business efficiency.</i></p>	<p>Observation:</p> <p>Compliance record retrievability and/or Sydney Metro awareness of evidenced-based compliance record keeping was observed to be a project weakness. Also, stakeholder communications and/or consultation evidence was often dependent on individual emails, rather than a formal project filing system.</p>	<p>Improvement Required:</p> <p>Implement Speedway Compliance Monitoring & Reporting Program requirements for "Evidence Based Record Keeping".</p>

APPENDIX A: Audit Findings (Administrative Conditions)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A1	<p>The Proponent must carry out the SSI in accordance with the terms of this approval and generally in accordance with the:</p> <ol style="list-style-type: none"> Sydney International Speedway- Environmental Impact Statement Volume 1 & 2 (the EIS) (dated August 2020) Sydney International Speedway - Submissions Report (the Submissions Report, dated November 2020); and Sydney International Speedway-Amendment Report (the AR, dated November 2020). 	<p>Various evidence cited throughout <u>this</u> report, but also including:</p> <ol style="list-style-type: none"> Sections 4.1, 5.1 and related conditions assessed in Appendices to <u>this</u> report Section 4.4.1 Site Footprint Area estimate dated 21-10-29 Pacific Surveys SIS Boundary Plot 21-03-19 Section 4.4.1 and Appendix F Section 4.4.1 Office of Sport Precinct Control Group meeting minutes dated 19 August and 16 September 2021 	<p>Several consent conditions, obligations and commitments had not been achieved or demonstrated, the quantum hereof collectively deemed to constitute a consent condition non-compliance based on the built development and formal evidence / records (or the absence hereof).</p> <p>Refer to evidence (column left alongside) plus that cited in <u>this</u> report for audit findings relating to:</p> <p><u>Terms of approval (non-compliances)</u></p> <ol style="list-style-type: none"> Consent condition non-compliances including but not limited to traffic & transport (C7), property noise treatments (E30), heat island effects (E42), wildlife light pollution guidelines (E44), nest box implementation strategy (C7), flooding performance compliance evidence (E15) and website maintenance (B6) <p><u>EIS / Amendment Report</u></p> <ol style="list-style-type: none"> Increased construction project footprint, increased native vegetation clearing and increased off-site spoil movements. Significant change to 100% solar car park lighting and 1,000+ tree planting commitments Carparks had been designed to be repurposed for additional but alternative uses (event staging) Potential change to the 10pm operational curfew were being progressed, with Office of Sport PCG meeting minutes indicating changing operations to extend the curfew to 11pm, with actions including commissioning of a new Noise Report to support a Consistency Assessment 	Non-compliant	NC-10
A2	<p>The SSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in in accordance with the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.</p>	<ul style="list-style-type: none"> Evidence reflected throughout this report, plus <u>Consistency Assessments</u>: SIS 01 Retaining Wall Drainage, approved 20/01/21. SIS 02 Drainage Design Footprint, approved 25/02/21. SIS 03 Spoil Reuse, approved 08/03/21 	<p>Other than above, and non-compliances reported elsewhere in this report, there appeared to be no other material differences regarding adherence to procedures, commitments, performance criteria and mitigation measures and documents listed in Condition A1 of this approval.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		<ul style="list-style-type: none"> SIS 04 Solar Array and Carpark Lighting, approved 30/06/21 SIS 05 Two-way southern access road, approved 01/09/21 <p><u>Environmental Reviews:</u></p> <ul style="list-style-type: none"> SIS ER01 Stormwater Road Crossing, endorsed 08/03/21. > SIS ER01 Additional Construction Area, 23/03/21 	<p>Since the initial IEA, two (2) additional Consistency Assessments were produced covering GHG / Car park lighting and changed operational arrangements for competitor and emergency vehicle turning arrangements exiting the so-called Competitor Car park area (Southern Gate).</p> <p>Observations regarding these CA's can be found in section 4.4, condition A1 above and Appendix E / F further</p> <p><u>Initial IEA Report dated 30-06-21 noted:</u></p> <p><i>Observed Consistency Assessments were mostly reliant on identified status quo mitigation measures however, with no additional process to confirm (as is the case with specific consent conditions and/or REMMS) that impacts assessed as being "consistent" were indeed so either during construction, pre-operation or beyond.</i></p>		
A3	<p>In the event of an inconsistency between:</p> <p>a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and</p> <p>b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>	As above	Other than above, no other material inconsistencies were observed or reported by Sydney Metro	Not triggered	
A4	In the event that there are differing interpretations of the terms of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.		No material information noted or provided to trigger this condition.	Not triggered	
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:	<ul style="list-style-type: none"> No correspondence, documentation or information provided or apparent 	Auditees indicated no formal directives from DPIE, with no information to the contrary observed during the Independent Audit.	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	a) the environmental performance of the SSI; b) any document or correspondence in relation to the SSI; c) any notification given to the Planning Secretary under the terms of this approval; d) any audit of the construction or operation of the SSI; e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); f) the carrying out of any additional monitoring or mitigation measures; and g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.		Addressed in the above.	As above	
A6	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include:	<ul style="list-style-type: none"> Refer to Appendix C 	Evidenced through Condition C3 consultation requirements, given that C9 Monitoring Programs were incorporated in associated Sub Plans.	Compliant	
	a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; b) a log of the dates of engagement or attempted engagement with the identified party and a summary of the issues raised by them; c) documentation of the follow-up with the identified party(s) where feedback has not been provided to confirm that they have none or have failed to provide feedback after repeated requests; d) outline of the issues raised by the identified party and how they have been addressed; and e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.			As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
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.		The development was underway in accordance with Notification of Commencement Condition A27 further.	Not triggered	
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, standards or policies in the form they were at date of approval.		No situations noted or provided to trigger this requirement	Not triggered	
A9	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This does not apply to the immediate written notification required in respect of an incident under Condition A34 .		No agreed deviations to submission timeframes noted - refer to Condition A32 further though.	Not triggered	
A10-A14	Staging (staged construction and operation) <i>Non triggered consent Infrastructure Approval requirements are not articulated here (this report) for brevity purposes.</i>	<ul style="list-style-type: none"> No documentation or discrete construction staging evidenced. 	Construction was not planned in discrete stages, with sequential work phases being undertaken in accordance with the relatively short timeline.	Not triggered	
A15-A17	Ancillary Facilities. <i>Non-triggered consent Infrastructure Approval requirements are not articulated here (this report)</i>	<ul style="list-style-type: none"> No additional facilities or related evidence sighted and/or observed 	Only one construction compound and site office was in use at any one time, this required under the SSI terms of Condition A1 to build the project.	Not triggered	
A18	Boundary screening must be erected around the construction boundary and all ancillary facilities that are adjacent to sensitive receivers for the duration of construction of the SSI unless otherwise agreed with relevant Council, and affected residents, business operators or landowners.	<ul style="list-style-type: none"> Refer to Initial IEA Report dated 30-06-21 	Boundary screening remained unchanged to that sighted during initial site inspection, these at open, visible and/or exits / gateways	Compliant	
A19	Work must not commence until an Environmental Representative (ER) has been approved by the Planning Secretary and engaged by the Proponent.	<ul style="list-style-type: none"> DPIE (undated) letter 	Initial IEA Report dated 30-06-21 noted <i>Planning Secretary had endorsed an ER from HBI, the individual named in section 3.5 of this report. Quoted submission date of 24 December 2020 by DPIE confirmed this was before construction commenced (as opposed to low impact works), the latter date evidenced in Condition A27 further.</i>	Compliant	
A20	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in Condition A1 and is independent from the design and construction personnel for the SSI and those involved in the delivery of it.	<ul style="list-style-type: none"> JR's Curriculum Vitae 	Initial IEA Report dated 30-06-21 noted <i>In addition to CV, abovementioned letter indicates DPIE assessment of skills, experience and qualifications, as well as confirmation by JR she did not assist in writing the EIS or Response to Submissions and was independent of personnel involved in the delivery of the project.</i>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A21	<p>The Proponent may engage more than one ER for the SSI, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the SSI.</p> <p>The ER must meet the requirements of the Environmental Representative Protocol (Department of Planning and Environment, October 2018).</p> <p>The appointment of the ER must have regard to the Department's guideline Seeking approval from the Department for the appointment of independent experts (OPIE, 2020).</p>	<ul style="list-style-type: none"> DPIE letter dated 23 March 2021 Lead Auditor Environmental, SAI Global dated 2007 Quarterly DPIE~ER Forum, dated 31/3/2021 	<p>Initial IEA Report dated 30-06-21 noted <i>Planning Secretary endorsed alternative ER being Brett M. (Name withheld from <u>this</u> report for privacy reasons)</i></p> <p><i>ER Protocol requirements were being met including:</i></p> <ul style="list-style-type: none"> <i>Auditing experience and training</i> <i>Seeking feedback from the Department regarding ER responsibilities and performance</i> <i>Inspections (refer A22 below)</i> 	Compliant	
A22	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must:	<ul style="list-style-type: none"> Refer to evidence below 	Initial IEA Report dated 30-06-21 noted <i>ER activities were assessed as undertaken as below</i>	Compliant	
	a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the SSI;	<ul style="list-style-type: none"> Email communication trail with DPIE from 12/1 to 19/3/21 regarding "construction commencement" et al 	Various emails demonstrated communications	As above	
	b) consider and inform the Planning Secretary on matters specified in the terms of this approval;	<ul style="list-style-type: none"> Telecon log of 19/3/2021 	Various communications including targeted telecons around approvals compliance management etc.	As above	
	c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;	<ul style="list-style-type: none"> Sydney Metro Environment & Approvals fortnightly meetings of 28/08/21, 30/09/21 et al 	Sighted ER recommendations when appropriate, documented in Sydney Metro Environment & Approvals meeting minutes	As above	
	d) approve documents and any updates to documents identified in Conditions A10, C1, C3 and C8 and any other documents that are identified by the Planning Secretary, after verifying all relevant matters set out in this approval pertaining to those documents have been met, and make a written statement to the Planning Secretary to this effect;	<ul style="list-style-type: none"> ER>SM letter dated 26 June 2021 re CTMP rev F approval ER email to DPIE re document approvals (below) sent @ 17:05 on 12/01/2021. <u>Letters</u> as follows, all dated 12/01/21: HBI Cover letter to Planning Secretary HBI Condition specific Approval Letters ER email notification to DPIE re (above) ER approvals sent 17:05 on 12/01/2021. ER (HBI) Document Review Compliance Tracking spreadsheet CSWMP dated 12/01/21 	<p>ER continued to approve Management Plans, noting few had changed. Otherwise, the initial IEA Report dated 30-06-21 noted</p> <p><i>Approval Letters relating to the following Management Plans and related Planning Conditions:</i></p> <ul style="list-style-type: none"> <i>CEMP - in accordance with Condition C1, C2 and C7.</i> <i>CTMP accordance with Condition C3(a)</i> <i>CFFMP accordance with Condition C3(</i> <i>CAQMP in accordance with Condition C3(d) and C8(a)</i> <i>CSWP in accordance with Condition C3(e) and C8(b)</i> 	As above	
	e) regularly monitor the implementation of the documents listed in Conditions A10, C1, C3 and C8 to ensure implementation is being carried out in accordance with the document and the terms of this approval;	<ul style="list-style-type: none"> Weekly ER inspections no's 1 - 38, the latter dated 04/11/2021. Monthly ER Reports, below 	Routine weekly inspections covered mitigation measures required by sub plans including soil and water controls, flora protection, noise, air quality (dust), and related issues and activities such as asbestos management and gas well monitoring.	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	f) as may be requested by the Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A29 of this approval; g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; h) consider the impacts of minor ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A17 of this approval; and		Not applicable and/or triggered at the time	As above	
	i) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports."	<ul style="list-style-type: none"> Monthly ER Reports from May to September 2021 	Followed the ER Protocol including reporting on: <ul style="list-style-type: none"> Upcoming activities and construction works. ER activities during the period Site inspections undertaken Approved documents Consultation and complaints 	As above	
	j) The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the SSI, or as otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Reports as above DPIE>HBI portal acknowledgement email dated 07/11/21 	ER reports such as SSI-10048-PA-28 continued to be submitted within the 7-day period required e.g. 3 May 2021, 5 May 2021.	As above	
A23	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A22 (including preparation of the ER monthly report), as well as: <ol style="list-style-type: none"> the complaints register (to be provided on a weekly basis or as requested); and 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). 	<ul style="list-style-type: none"> Consultation Manager database Sydney Metro weekly Environment & Approval meetings as above 	The ER indicated that Sydney Metro was providing all information necessary, with no information to the contrary observed during this audit. <ol style="list-style-type: none"> Complaints were discussed during the fortnightly E&A meetings. Email communications around Consistency Assessments indicated ER involvement before commencement of work/activities. 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A24	The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under Condition A22. The Proponent must: a) facilitate and assist the Planning Secretary in any such audit; and b) make it a term of their engagement of an ER that the ER facilitate and assist the Planning Secretary in any such audit.		Auditees indicated no formal directives from DPIE, with no information to the contrary detected during this Independent Audit.	Not triggered	
A25	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).		No Sydney Metro construction phase compliance reporting obligations were obligated.	Not triggered	
A26	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.		Operational phase - not applicable to construction.	Not triggered	
A27	The Department must be notified in writing of the dates of commencement of construction and operation at least two (2) weeks before those dates.	<ul style="list-style-type: none"> SM > DPIE email entitled "construction commencement" dated 14/12/20. Construction Program (Speedway Project) by Abergeldie dated 13/01/21 	Based on Auditee responses, objective evidence (alongside) and other records sighted during this audit, construction did not commence before 12 January 2021 - refer also to Conditions A22 e) and A27	Compliant	
A28	If the construction or operation of the SSI to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	<ul style="list-style-type: none"> Construction Program (Speedway Project) by Abergeldie dated 13/01/21 	Whilst the Construction Program and some Management Plans such as the CTMP reflected project "stages", these were contiguous, with no discrete packages stating and/or finishing.	Compliant	
A29	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	<ul style="list-style-type: none"> <u>This</u> Audit Report 	The Independent Audit PAR document dated May 2020 was adhered to in planning, conduct and reporting of this and the initial audit. Condition deemed complaint, unless otherwise advised by DPIE.	Compliant	
A30	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> DPIE Approval dated 9/4/2021. (Annexure A) 	<u>Non-compliance raised in Initial IEA Report dated 30-06-21:</u> <i>The initial Independent Audit was obligated to commence whilst Sydney Metro were still awaiting formal Planning Secretary endorsement of the nominated independent auditor, given PAR requirements to be conducted within 12 weeks of construction commencement.</i>	Non-complaint	NC-01

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A31	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020) upon giving at least four weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.			Not triggered	
A32	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> QEM>Sydney Metro email of 6/12/21 Sydney Metro>DPIE portal evidence TBA 	This report is intended to be submitted to Sydney Metro on 6/12/21 to enable submission by/on the 2-month target timeframe.	Complaint	
A33	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.		Operational phase - not applicable to construction.	Not triggered	
A34	The Planning Secretary must be notified in writing via the Major Projects Website immediately after the Proponent becomes aware of an incident. The notification must identify the SSI (including the application number and the name of the SSI if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix A	<ul style="list-style-type: none"> Contractor Incident Case Reports 19363 - 19370 and 196468 	<p>Nine (9) incidents were recorded, those classified as minimal (5), minor (3) and moderate (1). None constituted material harm and related regulatory notification.</p> <p>Incidents included asbestos fragment finds, minor hydrocarbon leaks and a small rain-related dirty water off-site release.</p>	Not triggered	
A35	The Planning Secretary must be notified in writing via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance.	<ul style="list-style-type: none"> Refer ER Monthly Reports, above Refer E30, further SM > DPIE email entitled "Condition E31 Operational Noise Mitigation Measures" dated 12 April 2021 Formal SM > DPIE letter entitled "Operational Noise & Vibration Mitigation Measures" dated 17 June 2021. 	Further to NC-03 raised in Initial IEA Report of 30-06-21: At-property noise treatments were not provided within 3 months of construction commencement as required by Condition E30 (Appendix E further), which in the opinion of the IEA should have triggered a A35 non-compliance notification to the Planning Secretary around mid-April. This did not occur.	Non-complaint	NC-03

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
			<p>Similar to the non-compliance against condition (A35) raised in the 1st IEA Report, Sydney Metro again profited a differing position and/or interpretation of Consent Conditions.</p> <p>Consequently, NC-03 remains (issue observed to continue), as indicated in s4.1 of <u>this</u> IEA Report.</p> <p>Otherwise, no other non-compliances were detected during this audit including ER reports sighted and/or identified by Sydney Metro / Construction Contractor.</p>		
A36	<p>A non-compliance notification must identify the SSI and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be undertaken to address the non-compliance.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	<ul style="list-style-type: none"> Above-mentioned letter and Attachment A: Contractor At-Property Treatment Progress Report of 11/06/2021 	<p>If the formal Metro letter above constituted a defacto A35 notification, this was observed to identify SSI, reference Condition E31, indicate reasons and next steps, the latter in attached report including appointment of a builder to undertake the works.</p>	Compliant	
A37	<p>The SSI name, application number, telephone number, postal address and email address required under Condition B3 of this approval must be available on the site boundary fencing / hoarding at each ancillary facility subject to Conditions A15, A16 and A18 before the commencement of construction. This information must also be provided on the website required under Condition B6.</p>	<ul style="list-style-type: none"> Site inspection, section 4.6 Refer Condition B6 	<p>Noted as displayed on main project site boundaries.</p> <p>Information provided on the website – refer Condition B6 further.</p>	Complaint	

APPENDIX B: Audit Findings (Community Information & Reporting)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
B1	The Overarching Community Communications Strategy as provided in the documents listed Condition A1 must be implemented until the project is handed over to the Western Sydney Parklands Trust.	<ul style="list-style-type: none"> Community Communication Strategy rev 3 dated 30th July 2021 Sydney Metro OCCS rev 2.1 dated 28/10/2020 	The Construction Contractor "Communication Community Strategy" had been reviewed since the last audit, with minor changes noted.	Compliant	
As above		<p><u>Consultation Manager</u> database, including specific categories of records such as:</p> <ul style="list-style-type: none"> Community Notifications April to October '21 Office of Sport Precinct Control Group meeting minutes May, July, August & September 2021 Site Project Control Group meeting minutes of March, April, September and October 2021 Engagement information and communication re-noise and noise treatments – requested reports from February to 7 July 2021 <p><u>Other CCS required records</u> including:</p> <ul style="list-style-type: none"> Abergeldie Monthly Reports Property Assessment offer letters of February and March 2021 	<p>The Contractor CCS continued to be implemented, sighting specific, discrete and general consultation and engagement records (Evidence Collected column left / alongside of <u>this</u> report).</p> <p>It was noted that the replacement Community Place Manager was unable to utilise Consultation Manager which could compromise information capture and retrieval</p>	As above	OBS-1
B2	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the SSI.	<ul style="list-style-type: none"> <u>Consultation Manager</u> database, including searchable query of "SIS complaints" 	Subject to competency of Community Place Manager, the established Consultation Manager / CMS was available to capture complaints when raised.	Compliant	
B3	The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction: a) a 24- hour telephone number for the registration of complaints and enquiries about the SSI;	<ul style="list-style-type: none"> Various records (right alongside) 	Website, notifications, emails and signage sighted furnished contact information required by Condition B3	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	b) a postal address to which written complaints and enquires may be sent; c) an email address to which electronic complaints and enquiries may be transmitted; and d) a process for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.				
B4	A Complaints Register must be maintained recording information on all complaints received about the SSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: a) number of complaints received; b) number of people in the household affected in relation to a complaint; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; and d) means by which the complaint was addressed and whether resolution was reached, with or without mediation.	<ul style="list-style-type: none"> • Consultation Manager database, "complaint" report extract dated 30/9/2021 • Sydney Metro Environment & Approval meeting #25 minutes from 11/11/2021 	Two (2) complaints had been registered: <ul style="list-style-type: none"> • Anonymous complaint received by the EPA on 29 June 2021 alleging that there are no methods in place to remove mud and rocks (Soil & Water issue) from vehicles leaving the site, which were tracking dirt into Ferrers Road • Sydney Dragway of 26 June 2021 regarding dust on their track (Air Quality issue) Complaint received beyond IEA timeframe but whilst this report was being finalised, recorded as: <i>"Received a complaint from property treatment house (drag way was operating). Windows and doors were open during the time the person experienced the noise issue. All resolved - date of complaint: Monday 8/11, resolved: Tuesday 9/11"</i>	Compliant	
B5	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. Personal details of complainants must be provided where this is consistent with the Proponent's privacy statement, notice or policy. Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.		It did not appear that DPIE had requested information on complaints during the temporal timeframe of this audit	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
B6	<p>A website or webpage providing information in relation to the SSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 12 months following the completion of all stages of construction.</p> <p>Up-to-date information (excluding confidential, private and/or commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including:</p>	<p>Contractor website: https://abergeldie.com.au/projects/bridges-roads/sydney-international-speedway/</p> <p>Sydney Metro websites: https://www.sydneymetro.info/station/sydney-international-speedway and https://www.sydneymetro.info/west/environment-planning</p>	<p>Websites (alongside) were established and maintained; with information mostly* published before relevant work had commenced, as evidenced further below.</p> <p>* NON-COMPLIANCE against B6 (e) however, this has been a continual issue for the SSI</p>	<p>Compliant</p> <p>Refer below</p>	
As above	a) information on the current implementation status of the SSI;	<ul style="list-style-type: none"> Community Notifications April to October 2021 	Website content was being refreshed	Compliant	
As above	b) a copy of the documents listed in Condition A1 and Condition A2 of this approval, and any documentation relating to any modifications made to the SSI or the terms of this approval;	<ul style="list-style-type: none"> Sydney Metro website 	<p>No Condition A1 document copy per se, however the Construction section indicates the Planning Approval and provides link to relevant section of DPIE Major Projects portal webpage.</p> <p>The Speedway Virtual Information Room also provides links to Condition A1 documentation.</p>	Compliant	
As above	c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available;	<ul style="list-style-type: none"> 	As above	Compliant	
As above	d) a copy of each statutory approval, licence or permit required and obtained in relation to the SSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website;	<ul style="list-style-type: none"> 	As above, no known apparent licences / permits, and no Environment Protection Licence required, not being a scheduled activity	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
B6	e) a current copy of each document required under the terms of this approval, which must be published within one week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and	<p>Proponent and Contractor website related info</p> <ul style="list-style-type: none"> Email SM (Comms) > WaterNSW dated 12/10/2021 <p>Contractor website metadata screenshots of :</p> <ul style="list-style-type: none"> Monitoring Report uploads of 11 October 2021 <p>Contractor website:</p> <ul style="list-style-type: none"> Screenshot of 17/11/21 and 6/12/21 (no further update evidenced) 	<p>Further to Non-compliance NC-04 raised in the Initial IEA Report of 30-06-21:</p> <p>Again, as observed during the initial SIS Independent Environment Audit, documentation was still not being published and/or provided on the website within the 1-week timeframe i.e.</p> <ul style="list-style-type: none"> The Initial IEA Report of 30-06-21 was 13 weeks late Construction Monitoring Program results: <ul style="list-style-type: none"> Quarterly Environmental Monitoring Report Q1 Jan - March 2021 (14 July 2021 revision), 12 weeks late Quarterly Environmental Monitoring Report Q2 April - June 2021 (26 July 2021 revision), 10 weeks late Quarterly Environmental Monitoring Report Q3 July-Sep 2021 (14 October 2021 revision), 7 weeks late at the conclusion of <u>this</u> report 	Non-compliant	NC-04
As above	Continued, as above	<p>Contractor website metadata:</p> <ul style="list-style-type: none"> CCS rev3 upload of 8-08-2021 CTMP rev F upload of 25-06-2021 	Other required documentation uploads had complied with specified Planning Approvals	As above	
B6	f) a copy of the compliance and audit reports required under Condition A25, and Conditions A29 and A31 of this approval.	<ul style="list-style-type: none"> Refer B6 (e) above 	<p>SIS IEA Report dated 30 June 2021 required by A29 / A31 was published late - indicated in B6 (e) above.</p> <p>Noted: Compliance Reporting Post Approval Requirements (2020) cited in A25 do not require any pre-construction or construction compliance reporting</p>	Non-compliant	NC-04 as above

APPENDIX C: Audit Findings (Construction Environment Management)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	<ul style="list-style-type: none"> CEMP dated 11 January 2021. 	Initial IEA Report dated 30-06-21 noted: <i>Alignment with CEMF addressed through Compliance Matrix, Annexure A, incorporated to the extent applicable in the CEMP or subplans. Similarly, CEMF tables in sub plans - refer Condition C4 further - evidenced compliance.</i>	Compliant	
C2	The CEMP must be prepared and submitted to the ER for approval no later than one (1) month before the commencement of construction, unless otherwise agreed by the ER. Where construction is staged, submission must be no later than one (1) month before the commencement of that stage, unless otherwise agreed by the ER	<ul style="list-style-type: none"> ER email dated 10/12/2020 to Proponent and Contractor 	Given construction reportedly as commencing 12/01/2021 - ER correspondence indicated her requirement for review and approval prior to construction commencing, stating "final versions to be provided no less than 5 days prior". No staged construction, as described earlier in this report.	Compliant	
C3	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan:	<ul style="list-style-type: none"> Evidence in attachment to Sub plans below: 	Initial IEA Report dated 30-06-21 noted: <ul style="list-style-type: none"> Workshops held 14/10/2020 with various agencies and precinct stakeholders around dust. Sub plans below evidenced consultation with specified stakeholders and agencies as attachments and response tables within the document. 	Compliant	
	(a) Traffic & Transport - Relevant Road Authorities, WSPT	<ul style="list-style-type: none"> CTMP rev D dated 05/01/2021 CTMP rev E dated 03/05/2021 CTMP Construction Traffic Management Plan rev F dated 24 June 2021, plus Appendices to the CTMP including: <ul style="list-style-type: none"> Appendix H.0 - Planning Conditions Compliance Matrix (20210105) Appendix H.1 - Blacktown Council Consultation Appendix H.7 - CTMP Rev F Blacktown City Council Consultation 	<ul style="list-style-type: none"> CTMP rev D, Annexure H Stakeholder Correspondence reflected feedback from Blacktown City Council, TfNSW and WSPT, plus return replies by Sydney Metro 2 nd IEA update (<u>this</u> report): <ul style="list-style-type: none"> CTMP Construction Traffic Management Plan rev E had been updated to rev F to include utilisation of Gate 4 to enter site 		

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	(b) Flora & Fauna - EESG, WSPT, and Council	<ul style="list-style-type: none"> CFFMP dated 12/01/21 	<ul style="list-style-type: none"> Annexure B Stakeholder Consultation Feedback Tables reflected when documents were sent for review, date comments received from WaterNSW, EESG and Blacktown City Council and how these had been addressed in the Sub-plan. 		
	(d) Air Quality (including dust) - WSPT, WaterNSW, and Council	<ul style="list-style-type: none"> CAWMP dated 12/01/21 	<ul style="list-style-type: none"> s2.0 Annexure B Stakeholder Consultation Feedback tables reflected when documents were sent for review, date comments received from WaterNSW, WSPT and Blacktown City Council and how these had been addressed in the Sub-plan. S2.1 reflected email correspondence. 		
	(e) Soil & Surface Water - EESG, WSPT, Sydney Water, WaterNSW and Council	<ul style="list-style-type: none"> CSWMP dated 12/01/21 	<ul style="list-style-type: none"> Annexure E Consultation Records tables reflected when documents were sent for review, date comments received from WaterNSW, WSPT and Blacktown City Council and how these had been addressed in the Sub-plan. 		
C4	The CEMP Sub-plans must be prepared in accordance with the CEMF.	<ul style="list-style-type: none"> Sub plans, above 	Initial IEA Report dated 30-06-21 noted: CEMF alignment addressed through Compliance Matrices, or CEMF tables in sub plans, typically in s4.4 of the Flora & Fauna Sub Plan and Soil & Surface Water Management Sub Plan	Compliant	
C5	Details of all issues raised by an agency relevant to development of a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-Plan.	<ul style="list-style-type: none"> Sub plans, above 	Initial IEA Report dated 30-06-21 noted: Correspondence attached to the various sub plans provided agency commentary and/or concerns such as: CTMP - no issues noted by BCC et al. CFFMP - no obvious issues are raised by stakeholders identified in C3 above, only extensive guidance by EESG. CAWMP- no obvious issues but concerns by WaterNSW noted as covered in the Sub plan or the Planning Approval. BCC (like WaterNSW) expressed concerns about dust trigger levels. CSWMP - no obvious issues, but concerns by WaterNSW noted as covered as above	Compliant	
C6	Any of the CEMP Sub-plans may be submitted to the ER along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction, unless as otherwise agreed by the ER.	Refer below	Refer to ER Conditions in Appendix A above	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C7	Commencement subject to approval Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the ER.	<ul style="list-style-type: none"> Refer Condition A22 (e) Refer Condition A27 SM > DPIE email entitled "construction commencement" dated 14/12/20 	<p>Initial IEA Report dated 30-06-21 noted:</p> <ul style="list-style-type: none"> ER approved CEMP and Sub-plans on 12/01/2021. Based on Auditee responses, evidence (alongside / left) and other records sighted during this audit construction did not commence before 12 January 2021 	Refer below	
C7 Cont'd	The CEMP and CEMP Sub-plans, as approved by the ER, including any amendments approved by the ER must be implemented for the duration of construction.	<ul style="list-style-type: none"> CEMP dated 11 January 2021. Environment Inspection (checklist) reports e.g. 11, 21 and 25 June 2021. Abergeldie Close evidence (photo's) to ER inspection #38 Inspection compliance photographs incl. <ul style="list-style-type: none"> Street Sweeper 2/07, 1/10 Water Cart 13/09 Workplace Inspections 20210705 & 20210913 Pre-Start 20210629 and 20210707 Project Audit Schedule Document Audit Reviews, incl. SWMP (21/7), CEMP (20/9), FFMP (23/7) and CTMP (24/9) Environment Control Maps, updates incl. Carpark D2 rev7. Project Induction Register (1318 entries at the time) Enviro-refresher material of 29/6/21 Plant & Equipment Register to 30/09 	<p>In general, key components of the CEMP not otherwise covered in Sub Plans below were mostly evidenced as implemented – refer "Evidence Collected" column left / alongside of <u>this</u> report.</p> <p>Noted, the scheduled FFMP, CTMP et al audits were actually only desktop document reviews, not implemented audits.</p>	Refer below	
	Sub-Plan implementation:	FLORA & FAUNA PLAN			
C7 Cont'd	F&F Subplan must be implemented (continued)	<ul style="list-style-type: none"> Nest Box Installation Report by Narla Environmental v1.0, dated 15-10-21 Tree Clearing Quantity & Type Survey by Pacific Survey) dated 25 October 2021 Vegetation Take-off (by Pacific Survey) dated 6 November 2020 	<p>The initial IEA Report dated 30-06-21 assessed the Flora & Fauna Plan as implemented for the initial high-risk phase of the works when clearing and tree protection was most relevant. Otherwise, remaining implementation and/or compliance records included that of:</p> <ul style="list-style-type: none"> 30 nest boxes provided early October 2021 to address Non-compliance NC-05 Project Clearing Surveys indicating: <ul style="list-style-type: none"> 157 m² Southern Myotis (threatened species) foraging habitat cleared 	Refer below	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
			<ul style="list-style-type: none"> 1,299 m² of additional Plant Community Type 849 and 850 vegetation clearing, totalling 4,342 m² and representing an approximate 15% increase in clearing of Threatened Ecological Community (TEC) Cumberland Plain Woodland over predictions in the revised Biodiversity Assessment Report associated with the SIS Amendment Report 		
	Sub-Plan implementation:	TRAFFIC & TRANSPORT			
C7 Cont'd	T&T Subplan must be implemented (continued)	<ul style="list-style-type: none"> Construction Traffic Management Plan rev F Vehicle Movement Plans, latest being 24/5/21 Traffic Management Plans (but no updates since April 2021) Road Occupancy Licenses, latest being 1703632 expiring 30/10/21 Traffic Control (Inspection) Checklist records of 29/06/21 Document "Audit" Review of CTMP dated 24/09 TMP document review tables (undated) N235 Monthly Reports - June, July & August 2021 	<p>Construction Traffic Management Plan arrangements such as use of Traffic Controllers (observed to be introspectively focused though), signage, site parking and active ROL's were in place, however there were minimal compliance records demonstrating routine implementation, for example:</p> <ul style="list-style-type: none"> Only 1 Traffic Control (Inspection) record provided to the IEA beyond January 2021 – noting TMP section 22.1 specifies daily observations, weekly inspections and night time inspections at least every 2 months No internal or external audits of TMP s22.4 had been conducted in the first 9 months of construction (only a desktop document review claimed to be an audit) No monitoring results reported - summary in the monthly report specified by TMP s22.2 only reported incident statistics and documentation development. There was no proof of haulage route monitoring / observations relating to compliance with prescribed route and traffic impacts, in the opinion of the IEA a reasonable due diligence activity. 	Non-compliant	NC-11
C7 Cont'd	T&T Subplan must be implemented (continued)	<ul style="list-style-type: none"> Refer Inspection section 4.6 of this report, plus Appendix G Photograph 1 and 2 Vehicle Movement Plans, latest being 24/5/21 Gate 4 Incident Report 0238 of 7/10/21 	<p>Further to the above, and as evidence of limited compliance monitoring, a contravention of Vehicle Movement Plan requirements for no right turning when exiting site through the southern gate into busy Ferrers Road was observed during the <u>IEA site inspection</u> as follows"</p> <p><i>On 7/10/21 at around 11am, two vehicles (white Ute and truck & dog) were seen taking a right hand turn when leaving carpark B out of gate 4. The correct procedure (as per the VMP and sign posting) is to take a left hand turn when leaving site and making a U-turn at the Chandos Road round-about.</i></p>	As above	NC-11

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C7 Cont'd	Staging subject to approval. Where construction of the SSI is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the ER.		Refer to Condition A10 Not triggered - but Condition overall assumes a non-complaint status based on Audit Finding above	As above	
C8	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of the SSI against the performance predicted in the documents listed in Condition A1 or in the CEMP: a) Dust – WSPT, WaterNSW, and Council to be consulted. b) Soil and Water - WSPT, Sydney Water, and Council to be consulted.	<ul style="list-style-type: none"> Air Quality Management Sub Plan dated 12/01/21. Soil & Surface Water Management Sub Plan dated 12/01/21. 	Construction Monitoring Programs were incorporated (and consultation evidence) in the above-mentioned subplans, as follows: a) CAWMP (dust) – s7.2 Monitoring Requirements. b) CSWMP (Soil & Water) – s9.3 Monitoring & Inspections	Compliant	
C9	Each Construction Monitoring Program must provide:	<ul style="list-style-type: none"> Sub plans, above 		Compliant	
C9 Cont'd	a) details of baseline data available; b) details of baseline data to be obtained and when;	<ul style="list-style-type: none"> CAWMP (dust), above 	<ul style="list-style-type: none"> Baseline data, s 7.2.1 reflected EIS Air Quality impact Assessment data, with Table 6 reflecting Adopted Background Air Quality Conditions for the project. 	As above	
C9 Cont'd	C9 (b) baseline data, as above	<ul style="list-style-type: none"> CSWMP (Soil & Water), above 	<ul style="list-style-type: none"> s 5.2.2 discusses Blacktown City Council's "Waterway Health Report" 2018-2019 results and the difficulty in obtaining representative data. s 9.3.1 indicates adoption of physical analytes recommended by the contractors ERSED specialist (SEEC) and Table 6 depicted location and presentation of a small creek leading into Eastern Creek west of Pipeline Park, defining sampling as first week of the month or following a rain event, however: Initial IEA Report dated 30-06-21 noted as IO-3: <i>A single sampling exercise was undertaken following rain event on 7 January 2021 there were no further details on how a representative baseline would be established prior to potential construction impacts</i> 	As above	
C9 Cont'd	c) details of all monitoring of the project to be undertaken; d) parameters of the project to be monitored; e) frequency of monitoring to be undertaken; f) location of monitoring;	<ul style="list-style-type: none"> Sub Plans, as above 	Both subplans generally cover requirements (alongside)	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C9 Cont'd	g) the reporting of monitoring results;	<ul style="list-style-type: none"> Sub Plans, as above 	Reporting of Monitoring results were described in the above-mentioned subplans, as follows: <ul style="list-style-type: none"> CAWMP (dust) – s 8.4 Compliance & Reporting indicating an “Air Quality Monitoring report will be made publicly available on a quarterly basis on the project website”. CSWMP (Soil & Water) – s 9.7 Reporting indicating quarterly reporting. Initial IEA Report dated 30-06-21 noted as IO-4: 	As above	
C9 Cont'd	h) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; i) any consultation to be undertaken in relation to the monitoring programs; and j) details of all information requested by an agency including copies of all correspondence from those agencies.	<ul style="list-style-type: none"> Sub Plans, as above 	Both subplans generally cover requirements (alongside) <i>Tables 6 and 7 Air Quality Indicator values differ to that predicted in the EIS tables 9.4 to 9.7.(section 4.6 of <u>this</u> report). Also, did not clearly address Speedway dust trigger level reporting requirements raised in WSPT submission and Speedway Delivery Agreement attached to the subplan.</i>	As above	
C10	The Construction Monitoring Programs must be submitted to the ER for approval at least one (1) month before the commencement of construction, unless otherwise agreed by the ER.	<ul style="list-style-type: none"> As above 	Refer C8 and C2 above	Compliant	
C11	Construction must not commence until the ER has approved all of the required Construction Monitoring Programs, and all relevant baseline data for the specific construction activity has been collected, unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> As above 	Refer C2 above	Compliant	
C12	MONITORING PROGRAM IMPLEMENTATION Construction Monitoring Programs, as approved by the ER must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	DUST Monitoring Program implementation <ul style="list-style-type: none"> Environment Inspection (checklist) reports as above. Quarterly Environmental Monitoring: <ul style="list-style-type: none"> Q1 Jan -March 2021 dated 14 July 2021 Q2 April - June 2021 dated 26 July 2021 Q3 July-Sep 2021 dated 14 October 2021 Eurofins DDG CoA Reports of 25 June, 9 July and 20 August 2021. 	DUST Monitoring Program implementation Specified monitoring requirements of s 7.2 were evidenced including: <ul style="list-style-type: none"> Weekly site inspections Item 5 Air Quality assessing dust suppression practices, truckloads being covered and smoke emissions from plant/vehicles (also a REMM AQ2 requirement) “Site Hive” real-time IT solution monitoring system used to monitor dust particulate levels and trends and alert triggers. 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		<ul style="list-style-type: none"> • “Site Hive” real-time PM dust monitoring system and Dashboard sighted on 11/10/21 • Site inspection observations from <u>this</u> audit incl. photographs of Appendix G. • Site Plant and Equipment Register to 30/09 	<ul style="list-style-type: none"> • Monthly Reports on DDG data from monitoring stations / gauges (REMM AQ3) and comparison to EPA Prospect data • Quarterly Environmental Monitoring reports evidencing monthly “Site Hive” data trends • External laboratory analysis of dust deposition • Site Plant and Equipment Register - servicing data 		
C12 Cont'd	Program implementation, as above	<p>WATER Monitoring Program implementation</p> <ul style="list-style-type: none"> • Eurofins WQ CoA Reports of 8/06, 8/07 and 25/08/21 <p><u>Dewatering Inspection Notification & Checklist reports</u>, incl.</p> <ul style="list-style-type: none"> • 2021-05-12 OSD Excavation • 2021-05-13 D1 / D2 verge at terralink wall exc. • 2021-05-22 Circuit Area • 2021-05-27 Stormwater in front of D2 • 2021-06-02 Settlement tank near OSD Tank • 2021-06-04 Stormwater in front of D2 • OSD Tank of 30/06, 02/07, 07/07 and 9/07/21 	<p>WATER Monitoring Program implementation</p> <p>Specified monitoring requirements of s 9.3 were evidenced including:</p> <ul style="list-style-type: none"> • Off-site River Water Quality Laboratory Analysis reports • Contractor Dewatering Water Quality testing checklist / reports from varied locations. <p>Abovementioned discharge water was treated with chemical prior to discharge as required by REMM SW4</p>	Complaint	
C 13	<p>The results of Construction Monitoring Programs must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</p> <p>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</p>	<ul style="list-style-type: none"> • Quarter 2 Environmental Monitoring Report from April - June 2021 dated 14 July 2021 • Quarter 3 Environmental Monitoring Report Q3 from July-Sep 2021 dated 14 October 2021 • Sydney Metro dashboard to DPIE Major Projects portal (screenshot of 22 October 2021) • SM>QEM (IEA) email re C13 of 27 October 2021. 	<p>The Construction Monitoring Program Reporting section of the following Sub-plans indicated frequency as follows:</p> <ul style="list-style-type: none"> ○ CAQMP - section 4.2 Table 1, Conditions of Approval indicates quarterly reporting to DPIE via Sydney Metro ○ CSWMP (above) section 9.7 Table 11, Reporting, indicates quarterly reporting <p>Submissions by Sydney Metro were sighted as being:</p> <ul style="list-style-type: none"> • Q1 Environmental Monitoring Report - promptly lodged on 16 July October 2021 • Q2 Environmental Monitoring Report of 26 July 2021 had not been lodged as @ 22 October 2021. (Metro provided evidence on 27 October 2021 that this had been submitted into the major project's online portal) • Q3 Environmental Monitoring Report - lodged on 2 November 2021 	Compliant	

APPENDIX D: OPERATIONAL Environmental Management

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

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APPENDIX E: Audit Findings (Key Issue Conditions)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Traffic and Transport impacts				
E1	All requests to Council for approval to use local roads, which are not identified for use in the documents listed in Condition A1, must include a traffic and pedestrian impact assessment, and a swept path analysis if requested. The findings of the traffic and pedestrian impact assessment must inform the Traffic and Transport CEMP Sub-plan (Condition C3), and:	<ul style="list-style-type: none"> Refer to initial SIS Independent Environment Audit Report dated 30th June 2021 	No apparent new local roads used since initial SIS Independent Environment Audit, confirmed by Sydney Metro who did not table any further evidence.	Compliant	
As above	a) demonstrate that the use of local roads will not compromise the safety of the public and have no more than minimal amenity impacts; b) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; and c) describe the measures that will be implemented to avoid where practicable, the use of local roads past schools, aged care facilities and childcare facilities during peak times for operation.	<ul style="list-style-type: none"> As above 		As above	
E2	Before use of Ferrers Road or any local road by a heavy vehicle for construction of the SSI, a Road Dilapidation Report must be prepared for the relevant road. A copy of the Road Dilapidation Report must be provided to the relevant Council within three weeks of completion of the survey and at least two weeks before the road is used by heavy vehicles associated with the construction of the SSI.	<ul style="list-style-type: none"> Refer to initial SIS Independent Environment Audit Report dated 30th June 2021 		Compliant	
E3	Road damage. <i>Requirements for rectification and/or compensation within 3 months after the completion of construction had not been articulated in <u>this</u> report for brevity purposes.</i>		Construction completion scheduled for around December 2021 or January 2022.	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E4	During construction, all reasonably practicable measures must be implemented to maintain pedestrian and vehicular access to, and parking in the vicinity of, businesses and affected properties within the Eastern Creek Motor Sports Precinct 5 as identified in the Western Sydney Parklands Plan of Management 2030. Disruptions must be avoided, and where avoidance is not possible, minimised. Where disruption cannot be minimised, alternative pedestrian and vehicular access, and parking arrangements must be developed in consultation with affected businesses and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.	<ul style="list-style-type: none"> Refer to initial SIS Independent Environment Audit Report dated 30th June 2021 		Compliant	
E5	The SSI (including new or modified local roads, parking, pedestrian and cycle infrastructure) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management.	<ul style="list-style-type: none"> Design Memo Ferrers Rd (Competitor exit) Intersection dated 25/5/20 by Turnbull Engineering 	<p>Unchanged since to initial SIS Independent Environment Audit Report dated 30th June 2021.</p> <p>Relevant guidelines such as AS1742.3, Austroads GRD and RMS supplements was claimed by Turnbull Engineering as being considered in the design of Southern Competitor exit into Ferrers Road.</p>	Compliant	
E6	An independent Road Safety Audit of detailed design plans of new or modified local road, parking, pedestrian and cycle infrastructure provided as part of the SSI must be undertaken by an appropriately qualified and experienced person before construction to ensure that they meet the requirements of relevant design, engineering and safety guidelines, including Austroads Guide to Traffic Management. Audit findings and recommendations must be actioned before construction of the relevant infrastructure and must be made available to the Planning Secretary on request.	<ul style="list-style-type: none"> Consistency Assessment for SIS 05 Two-way southern access road, approved 01/09/21 Attachment to above – Traffic Assessment Report by ARC Traffic & Transport dated 30/08/21 Turnbull Detailed Design Stage 3 RSA Audit Report rev B dated 13/08/20 	<p>Consistency Assessment for amended competitor arrangements indicated “no impact on general access, safety or the operation of the Site intersections and broader road network”. Otherwise</p> <p>Initial IEA Report dated 30-06-21 noted:</p> <p><i>Turnbull Engineering RS audit of 6/7/2020 utilised two Level 3 Road Safety Auditors RSA-0200165 and 0200469), with information such as 2.3 RSA Referenced Materials cited Austroads Guides to Road Safety and Road Design plus AS1742.1 Manual for uniform traffic control devices. The Austroads Guide to Traffic Management was not mentioned per se. Designer Response of August 2020 was incorporated into Table 4.1 of the Audit Findings section of the report, reflecting coverage and/or incorporation into the design and IFC drawings.</i></p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Event Management				
E7	Scheduling of events (both minor, major and concurrent) must be managed to reduce noise, traffic and dust impacts.			Not triggered	
E8	No concurrent events at the Sydney International Speedway and the Western Sydney International Dragway are permitted to occur until a Major Events Operations Plan) has been prepared to address traffic management, parking, noise and dust management.			Not triggered	
	Air Quality impacts				
E9	In addition to the commitments to develop performance outcomes and mitigation measures for air quality specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the construction and operation of the SSI.	<ul style="list-style-type: none"> Varied evidence cited in this report, including site, ER, and IEA (section 4.6) inspections, plus: Weather Station Data monthly output spreadsheet, April to September 2021 "SiteHive" Events Dashboard - none open at 15 October 2021 Concrete cutting wet-down photograph GRT-Haul-Loc (dust suppression(Safety Data Sheet) dated Oct-2019 and contractor photograph of 16 July 2021 	Practices noted in Initial IEA Report dated 30-06-21 continued including use of water cart, wetting down of rock breaking and concrete-cutting activities, use of weather station etc. Also, extensive use of dust suppression polymer on exposed and/or trafficable areas, sighted during the site inspection and reflected in weekly ER inspection reports	Compliant	
E10	Commitments to develop performance outcomes and mitigation measures for air quality specified in the documents listed in Condition A1 must be implemented during construction and operation of the SSI to ensure the operational safety of the Western Sydney International Dragway.	<ul style="list-style-type: none"> CAQMP implementation and monitoring records above and previously cited. 	As above, plus Construction Contractor was formally engaging with Dragway Operator pre-events, with measures including partial or complete site shut downs. Event planning was noting in Dragway participated meetings evidenced in Appendix B	Compliant	
E11	Operational air quality mitigation measures as identified in the documents listed in Condition A1 that will not be physically affected by work, must be established as soon as practicable during construction.	<ul style="list-style-type: none"> Refer Appendix G – Photo 12 Premium Hortshade Medium Product Profile Rev.6 9/18 Dust Shield Fence Structure specification and design by Central Industries, dated 26/3/2021. SIS Operational AQ Management Plan by Ramboll, dated 24/2/21 Sydney Speedway Dust Screen Design Review by Ramboll, dated 23/12/20 	Dust screen post supports had been installed and Industrial Gale Pacific Premium Hortshade Medium Black (AS 2001.2.3.12001) determined as suitable for the mesh screens, with Maximum Force Warp (Mean) of 480 N/50mm Initial IEA Report dated 30-06-21 noted: <i>The Speedway design includes a stormwater detention tank (drawings referenced elsewhere in this report) with a pump to allow the Speedway operator to continually water the track and mitigate the risk of dust generation.</i>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Biodiversity impacts				
E12	The clearing of native vegetation must be minimised with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	<ul style="list-style-type: none"> Tree Clearing Quantity & Type Survey by Pacific Survey) dated 25 October 2021 Ecologist Post-Clearing Survey (previously referenced) Consistency Assessment (previously referenced) 	<ul style="list-style-type: none"> Whilst efforts had been undertaken to minimise clearing e.g. specific drainage work for carparks (evidencing work-around for specific trees), construction safety concerns around batter chutes had resulted in 15% more EEC clearing than predicted - refer section 4.4.2 of <u>this</u> report. A Consistency Assessment deemed this to be generally in accordance with consent conditions. The Independent Environmental Auditor and author of <u>this</u> report acknowledges above (with this condition potentially "complaint") although non-compliances were raised instead against REMMs LV1 and B1, given that no robust and proactive decision-making process was evidenced. 	Compliant	
E13	Before any vegetation clearing or tree removal that must be offset, the Proponent must purchase and retire Biodiversity credits specified in Table 1 below. The retirement of credits must be carried out in accordance with the offset rules of the Biodiversity Conservation Act 2016 (BC Act). This can be achieved by: <ol style="list-style-type: none"> Biodiversity Stewardship Agreement under the BC Act; or making payments into an offset fund that has been established by the NSW Government; or providing suitable supplementary measures. [Refer to Instrument of Approval for Table 7] 	<ul style="list-style-type: none"> Biodiversity Conservation Trust Certificate BCF170 dated 28-1-2021 	Initial IEA Report dated 30-06-21 noted: <i>Biodiversity Conservation Act 2016 section 6.33 confirmation of \$158.6k payment for 6 credits, 1 more than Table 7</i>	Compliant	
E14	The Proponent must submit evidence of the retirement of credits required by Condition E13 to the Planning Secretary for information within one month of receiving the evidence of the retirement of credits and/or a certificate confirming payment under section 63 of the BC Act 2016 before any vegetation clearing or tree removal that must be offset.	<ul style="list-style-type: none"> Metro>DPIE email entitled "biodiversity offsets" of 28-1-2021. DPIE>Metro email of 2-2-2021 Narla Post Clearing Report issued 12-2-2021 (survey undertaken 3-5 February 2021) 	Initial IEA Report dated 30-06-21 noted: <ul style="list-style-type: none"> Email sent the same day as Trust Certificate (E13 above) DPIE email indicated "the Department acknowledges your submission of evidence of the retirement of credits required by Condition E13(b) and A1 (through the Amendment and Submissions Report for the project) and also acknowledges the NSW Biodiversity Trust's statement confirming payment into the Biodiversity Conservation Fund for the required credits and that this payment satisfies the Biodiversity credit retirement obligations under Conditions of Approval for SSI 10048. 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Flooding impacts				
E15	Measures identified in the documents listed in Condition A1 to maintain or improve flood characteristics must be incorporated into the detailed design of the SSI. For the purposes of this condition, "maintain" means:	<ul style="list-style-type: none"> Section 4.6 and Appendix G photographs incl no.11 Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21 Turnbull Stormwater Water Quality & Drainage design MEMO 0111 dated 15/01/2021. Stormwater Management General Arrangement Plan drawings 0013/11814 Issue 6 dated 5/2/21 E48 evidence further 	<p>Whilst flood mitigation infrastructure cited below and in E48 further were sighted during the inspection as incorporated in the works, there continued to be no quantitative proof of performance.</p> <p>Initial IEA Report dated 30-06-21 noted: <i>The design incorporated IES and SIS Amendment Report stormwater management measures such as batter chutes and vegetated swales (mitigating run-off from Carpark A, C and D), two (2) large onsite detention tank(s) or OSD's located in the Speedway itself and adjoining competitor Carpark B, these noted in the GA drawings as being of 1,200 m³ and 1,500 m³ capacities. However:</i> <ul style="list-style-type: none"> Specific current (not EIS) design information could not be provided to unequivocally demonstrate that flooding performance objectives (refer subclauses a to c below) during Speedway operation would be achieved. No TUFLOW or equivalent flood modelling had been conducted as was the case with the Amended EIS concept design, nor were any flood level - dissipation time computations undertaken. </p>	Non-compliant	NC-06
As above	a) a maximum increase in inundation levels upstream of the SSI of 50 mm in a 1% AEP rainfall event;	<ul style="list-style-type: none"> No formal project performance evidence provided 	<p>No documented proof (evidence) tabled.</p> <p>Sydney Metro solicited response from their designer <i>"The SSI is located at the upper extremity of the minor overland catchment draining to Eastern Creek. Therefore, there is no change to levels upstream of the SSI of 50 mm in a 1% AEP rainfall event (or otherwise)"</i></p>	Non-compliant	
As above	b) no increase in flood inundation levels in the Warragamba Pipelines corridor	<ul style="list-style-type: none"> No formal design performance evidence No drainage designs provided for southern site exit and permanent stockpile area 	<p>Compliance performance evidence (proof) such as models, calculations, drainage designs or compliance certification to demonstrate Planning Approval compliance were not provided, noting</p> <ul style="list-style-type: none"> The Speedway Amendment Report stated: <i>"Appropriate drainage would be provided in the southern area of the project site, so that safe access to the Warragamba Pipelines corridor for WaterNSW is maintained"</i>. 	Non-compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
			<ul style="list-style-type: none"> Sydney Metro Designer responded: <i>"Catchment area draining to Warragamba Pipelines Corridor is unchanged. Therefore, there is to be no increase in flood inundation levels in the Warragamba Pipelines Corridor"</i> 		
As above	c) a maximum increase in inundation time of one hour in a 1% AEP rainfall event;	<ul style="list-style-type: none"> Turnbull information and design, above, plus Stormwater General Arrangement Catchment Area Sheets SM-0101 to 0108, Issue 6 dated 27/04/21 Speedway channel flow spreadsheet, modified 16/04/21 Stormwater Detention Tank DET-TANK-690-1A and 2A drawings dated 16/4/21 OSD A8-4 Combined Drawings 21022-S01 et al dated 20/4/21 21022 OSD Tank A4-1 Combined Drawings 21022-S11 dated 2/6/21 	<ul style="list-style-type: none"> Stormwater detention infrastructure such as OSDs and Stormflows had been provided in accordance with the design and EIS, however <ul style="list-style-type: none"> Performance calculations and predictions such as TUFLOW or equivalent flood modelling and flood level dissipation time computations were not available to confirm extent of predicted flooding per SIS Amendment Report s4.7.3 – refer text below The design did not reduce the diameter of the inlet pipe which directs water through the culvert underneath Ferrers Road between Carpark C and D per SIS Amendment Report s4.7.3 	Non-compliant	
EIS	SIS Amendment Report	<ul style="list-style-type: none"> As above 	<p>Potential amended flooding & hydrology impacts SIS Amendment Report 4.7.3 noted:</p> <ul style="list-style-type: none"> As a result of the proposed amendments, there would be a potential increase in flood levels for short periods upstream of the culvert underneath Ferrers Road between Carpark C and D during the 1% AEP flood event. Potential impact during the 1% AEP critical median storm, compared to existing conditions includes: <ul style="list-style-type: none"> Minor increase on flood extent upstream of the culvert. Increase in flood depths by up to 1.1 metres, and a potential minor increase in the duration of inundation by about 12 minutes compared to existing conditions critical median storm event (25-minute duration) 		
As above	d) no impact on emergency management; and e) no impact on essential services and infrastructure.	<ul style="list-style-type: none"> No definitive evidence provided 	Information sighted through other Planning Approval verifications <u>herein</u> appeared to address subclauses d) and e)	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E16	Condition E15(a) does not apply in relation to detention of water between Carpark C and Carpark D as identified in the documents listed in Condition A1 as a result of drainage changes to prevent overtopping of Ferrers Road in the 1% AEP event.	<ul style="list-style-type: none"> As above plus General Arrangement Plan Sheets SM-0103, 0302 3- 7 Issue 6 dated 5/2/21 	Designer Memo indicated <i>"The stormwater detention provided in this location was indicated as addressing Blacktown City Councils requirements for permissible site discharge (PSD). The PSD is achieved for the 1% AEP without Ferrers Road overtopping".</i>	Compliant	
E17	Flood information developed during detailed design , such as flood reports, models and geographic information system outputs, and work as executed information from a registered surveyor certifying finished ground levels, the dimensions and finished levels of all structures constructed as part of the SSI within flood prone land, must be provided to the council, EESG and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the SSI. The Council, EESG and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction. Information requested by the Council, EESG or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the council, EESG and the SES.		<p>Sydney Metro confirmed their intention to submit all stormwater drainage work as executed drawings as soon as completed and provide required notification of completion as per condition E17.</p> <p>Also Sydney Metro indicated that as the subject lot is not subject to local flooding or mainstream flooding per Blacktown Council's online portal for flood information (below), a flood assessment was not required as part of the Detailed Design. http://maps.blacktown.nsw.gov.au/</p>	Not triggered	
	Heritage				
E18	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	<ul style="list-style-type: none"> Sydney Metro Unexpected Heritage Finds Procedure v3.3v dated June 2020 	Initial IEA Report dated 30-06-21 noted: <i>The adopted Unexpected Heritage Finds Procedure had been previously prepared for the City & South-west Sydney Metro project in accordance with required heritage guidelines and standards.</i>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E19	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist and submitted to the Planning Secretary for information no later than two weeks before the commencement of construction	<ul style="list-style-type: none"> As above Metro>DPIE email entitled "Construction Commencement date and Heritage Finds Procedure" of 14-12-2020. 	Initial IEA Report dated 30-06-21 noted: <i>The Procedure had been prepared by the Senior Heritage Advisor employed by Sydney Metro for the City & South-west Sydney Metro project, deemed compliant for that project. Notification to DPIE was by email which intimated intention to commence construction on 18 December 2020 (i.e. not within the 2 weeks), however this was prior to the Planning Approval, and construction commenced later around 12 January 2021.</i>	Compliant	
E20	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.			Not triggered	
E21	If any unexpected heritage finds are identified during the work described in the documents listed in Condition A1, details of any archival recording must be documented in accordance with any guidelines and standards required by the Heritage <i>Further "non triggered" SSI consent conditions are not articulated here (in this report) for brevity purposes</i>	<ul style="list-style-type: none"> 		Not triggered	
Noise and Vibration impacts					
E22	A detailed land use survey must be undertaken to confirm sensitive land uses (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration, construction ground-borne noise and operational noise. The results of the survey must be included in the Noise and Vibration Impact Statement required by Condition E27	<ul style="list-style-type: none"> CNVIS (E27 below) 	Initial IEA Report dated 30-06-21 reported: <i>CNVIS s2.1 Table 2: Noise Catchment Areas & Surrounding Land Uses identified 7 Noise Catchment Areas or NCAs including residential, commercial and industrial uses. Given usage and that most receivers were more than 700 m distant, no receivers were identified as sensitive, nor were any operating theatres or laboratories identified.</i>	Compliant	
E23	Work must only be undertaken during the following construction hours:	<ul style="list-style-type: none"> Daily Site Diaries e.g. <ul style="list-style-type: none"> September 29, 20, 18, 16, 13, 9, 4 	Other than low impact works of (E24) below, most work during the IEA assessment were within standard construction hours. Sighted subcontractor documentation	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	a) 7:00am to 6:00pm Mondays to Fridays, inclusive; b) 8:00am to 6:00pm Saturdays; and c) at no time on Sundays or public holidays.		indicating start times between 06:30 and 07:00, finishing around 17:00 weekdays and 13:30 Saturday		
E24	Notwithstanding Condition E23 work may be undertaken outside the hours specified in the following circumstances:		Most works were being undertaken during the day. Refer E24 (b) further	Compliant	
As above	(a) Emergencies , including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or loss of life, to avoid damage or loss of property or to prevent environmental harm. <i>Further "non triggered" SSI consent conditions are not articulated here (in this report) for brevity purposes.</i>	•	Not triggered - no emergencies were reported during the IEA period.	As above	
As above	(b) Low impact , including: (i) construction that causes LAeq (15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), or • no more than the 'Noise affected' noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or (ii) construction that causes LAfmax (1s minute) noise levels no more than 15 dB(A) above the rating background level at any residence; or (iii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006);	<ul style="list-style-type: none"> • "Site Hive" real-time LAeq noise monitoring system data trends and Dashboard sighted on 11/10/21 • "Site Hive" real-time LAeq noise monitoring data trend screenshot from night works of 12/10/21 • N235 Monthly Reports - June, July & August 2021 • Noise & Vibration Monitoring Record (completed form) of 14/4/21 • Contractor At-Property Treatment Progress Report of 11/06/2021 incl. SLR report 	<p>Site Hive" real-time LAeq noise data appeared to confirm that daily works and a few OOHWS / deliveries were of relatively low impact. On the day for example LAmax noise data for the Eastern Drag Track Monitor evidenced an uptick over background noise of 60dBA around 06:30 to around 70dBA, with one spike of 76dBA noted at 13:46</p> <p>No attended noise monitoring records were provided for the IEA timeframe, noting especially for Chandos Road sensitive receivers to demonstrate claimed low-impactful construction activities. Also, the SLR Noise assessment report of May 2021 recommended this be undertaken especially of high intensity works. It was noted that there had been no noise complaints during the IEA period – refer Condition B4</p>	As above	OBS-2

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	(c) By Agreement , including: (i) negotiated agreements with directly affected residents and sensitive land uses.		No negotiated agreements were reported during the IEA period.	As above	
E25	Where a negotiated agreement is proposed in order to undertake out-of-hours work, the Proponent must identify appropriate respite periods for the out-of-hours work in consultation with the community at each affected location on a regular basis. <i>Further "non triggered" SSI consent conditions are not articulated here (in this report) for brevity purposes.</i>		As above	Not triggered	
E26	Highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: a) between 8:00 am to 6:00 pm Monday to Friday; b) between 8:00 am to 6:00 pm Saturday; and c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour <i>Further "non triggered" SSI consent conditions are not articulated here (in this report) for brevity purposes.</i>			Not triggered	
E27	A detailed Noise and Vibration Impact Statement must be prepared based on realistic construction scenarios, plant and equipment, and site layout and include:	<ul style="list-style-type: none"> Construction Noise & Vibration Impact Statement v2.0 dated 23 December 2020 	Initial IEA Report dated 30-06-21 reported: Construction Noise and Vibration Impact Statement prepared by SLR Consulting was prepared.	Compliant	
As above	a) rating background levels identified from background noise monitoring; b) noise management levels for each sensitive receiver; c) mitigation measures incorporated, including shielding effects of ancillary infrastructure or topography, and justification for selection where multiple options are available;	<ul style="list-style-type: none"> As above 	Initial IEA Report dated 30-06-21 noted the following: a) Ss2.1 Table 4 b) Table 9 NMLs for the 7 NCAs c) Tables 20 & 21 (Standard and Additional Mitigation Measures)	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	d) comparison of impacts against the NMLs identified in (c); e) the extent of exceedances; f) the likelihood of sleep disturbance or impact to ecological processes (such as foraging or other activities of nocturnal species known to be present in Prospect Nature Reserve); g) the duration of work outside of standard construction hours; h) noise mitigation to be adopted and implemented.	<ul style="list-style-type: none"> Desktop Ecological Noise Impact Assessment by Narla Environmental dated 8/02/2021 	d) Tables 16 & 17, worst case predicted NMLs at Residential and Commercial Receivers respectively e) Table 19, Predicted Number of NML Exceedances, indicated as being 9 in total, these < 10dBA above and "typically marginal to minor" f) CNVIS Table 1 states this to be addressed by Construction Contractors Ecologist ** g) s4.1.1.2 covers work outside of standard construction hours for the duration of project h) s7 Mitigation and above-mentioned Tables 20, 21 et al. ** Ecologist report determined that "it is deemed unlikely that the proposed works would result in a significant disruption to the ecological processes of the nocturnal fauna present within the Prospect Nature Reserve."		
As above	The detailed Noise and Vibration Impact Statement must be prepared in consultation with the relevant council and submitted to the ER one month prior to the commencement of construction, unless otherwise agreed by ER.	<ul style="list-style-type: none"> BCC>Metro>WSPT email entitled "SIS CNVIS" of 24-12-2020. 	Initial IEA Report dated 30-06-21 noted: BCC confirmation of having "no concerns with the CNVIS"	As above	
E28	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); and c) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions".	Varying records cited in <u>this</u> report.	Relevant noise mitigation measures (e.g. mandatory non-tonal reverse "quackers" of vehicles and movable equipment) were implemented as appropriate and necessary, as evidenced in varying records cited in <u>this</u> report. Vibration impacts did not appear to be an issue to manage,	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	Any work identified as exceeding the noise management levels and/or vibration criteria must be managed in accordance with the Noise & Vibration Impact Statement. Note: The Interim Construction Noise Guideline identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.		Not triggered	As above	
E29	At-property treatment must be provided to the properties identified in Table 38 of the Noise and Vibration Technical Paper (dated July 2020), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Assessment Offer Letters dated 1/02/2021 plus reminders of 17/02/2021 and 3/03/2021 <u>Dwelling Reports / Noise Treatment Agreements:</u> <ul style="list-style-type: none"> Chandos Road id4, v1 dated 1 April 2021 Chandos Road id6, v1 dated 1 April 2021 Chandos Road id12, v1 dated 1 April 2021 Chandos Road id13, v2 dated 5 May 2021 Contract with Master Building Solutions Pty Ltd, executed 22 June 2021 	<p>Sydney Metro Community team had approached 15 property owners identified in Table 38 of the Noise and Vibration Technical Paper, with only four (4) owners reported to have accepted at-property noise treatments.</p> <p>Dwelling assessments were conducted from 5 - 25 February 2021 by project noise consultant (SLR Consulting) together with a Building Contractor who had been lined up to quote on the works, comprising new windows (6.5mm hush glazing) plus ventilation systems.</p> <p>Whilst substantially progressed, property treatments were not provided at the time of audit but being progressed – this condition deemed complaint due to evidence sighted with due consideration of E30 and E31 below.</p>	Compliant	
E30	Operational noise mitigation measures as identified in the documents listed in Condition A1 that will not be physically affected by work, must be implemented within three (3) months of the commencement of construction in the vicinity of the impacted receiver to minimise construction noise impacts, and detailed in the Noise and Vibration Impact Statement for the SSI.	<ul style="list-style-type: none"> Not implemented withing IEA timeframe - consequently no evidence. Contract with Master Building Solutions Pty Ltd, executed 22 June 2021 	<p>The 3-month deadline (completion by 12 April 2021) was not achieved, therefore determined to be non-compliant.</p> <p>Whilst substantially enabled, property treatments were not provided in the 9 months to date, the project nearing completion - refer A31 below. It should be noted that:</p> <ul style="list-style-type: none"> No works either of the SSI project or otherwise were being undertaken to physically affect at-property installation Covid 19 related Health Orders only affected works some 2 months past the deadline E30 has been interpreted by the IEA to be a standalone consent condition with compliance outcome either achieved or not, irrespective of related obligations below 	Non-compliant	NC-12

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E31	<p>Where implementation of operational noise mitigation measures is not proposed in accordance with Condition E30, the Proponent must submit to the Planning Secretary a report providing justification as to why they will not be implemented, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures identified in the documents listed in Condition A1 are implemented.</p> <p>The report must be submitted to the Planning Secretary before the commencement of construction that would affect the identified sensitive receivers.</p>	<ul style="list-style-type: none"> SM > DPIE email entitled "Condition E31 Operational Noise Mitigation Measures" dated 12 April 2021 Formal SM > DPIE letter entitled "Operational Noise & Vibration Mitigation Measures" reference SMWSPC-SMD-SPY-PL-COM-000152-IN-01 dated 17 June 2021. SIS "At-Property Treatment Progress Report" by Abergeldie Contractors dated 11 June 2021 (attached to above-mentioned) 	<p>Sydney Metro had corresponded both informally and formally during April and June respectively.</p> <ul style="list-style-type: none"> Providing justification – it was stated as being not feasible within a 3-month period Temporary measures - none stated, although noise consultant (SLR Consulting) had undertaken a review of actual site data versus predicted indicating it unlikely that construction noise would affect properties even without operational acoustic treatments being completed. <p>Noted:</p> <ul style="list-style-type: none"> SLR recommended that attended noise surveys along Chandos Street be conducted during intensive construction activities - refer E24 Observation 02 above 	Compliant	
E32	Operational Noise Compliance Report <i>Requirements not articulated in <u>this</u> report for brevity purposes.</i>			Not triggered	
Socio-Economic, Land use and Property					
E33	The Proponent must identify the utilities and services (hereafter "services") potentially affected by Construction to determine requirements for adjustment, relocation, diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from the construction of the SSI are avoided and advised to customers.	<ul style="list-style-type: none"> IFC Utility Drawings UT-0011 and 0101 – 0108 dated 20/11/2020. Turnbull Detailed Design MEMO 0037 dated 04/09/2020. 	<p>Initial IEA Report dated 30-06-21 reported:</p> <p><i>Utility drawings pack showed existing and proposed utilities, with the Combined Utilities Pothole Plan, Appendix C to the Detailed Design Project scope of works reflected Endeavour Energy, NBN and Jemena (Dial Before You Dig) DBYD searches, as per REMM HR1 Survey drawings were also available for Sydney Water as-built assets, plus consultation with the Sydney Water coordinator for protection of asset scope of works had been undertaken.</i></p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Soil				
E34	All reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise water pollution. When implementing such controls, any relevant guidance in the Managing Urban Stormwater series must be considered.	<ul style="list-style-type: none"> Varied evidence cited in <u>this</u> report, including Contractor, ER, and IEA (section 4.6) inspections, plus: Appendix G Photographs further in <u>this</u> report Contractor image library of: <ul style="list-style-type: none"> Concrete wash-out Bunded top of stockpile Wheel Wash, Rumble grid, stabilised entry 	The construction contractor continued to utilise the services of specialist soil conservationist (SEEC), who together with experienced team were ongoingly implementing, improving and maintaining ERSED controls. These appeared to be in accordance with the "Blue Book" for the audit period.	Compliant	
E35	The permanent stockpile to be located on Lot 1 DP 1077822 must be designed and treated to ensure a stable landform and that existing drainage paths from the Warragamba pipeline corridor are not impeded.	<ul style="list-style-type: none"> Refer Appendix G – photos 1, 9 & 10 Ferrers Rd Stockpile 12D model screenshots of 15/10/21 General Arrangement Plan drawing CS-0301 Issue 6 dated 01/07/21 Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21. Landscape GA drawing L-209, IFC rev 2, dated 16-11-20 	<p><u>Non-compliance NC-07 raised in Initial IEA Report dated 30-06-21 was due to the initial stockpile design not adequately addressing stability and/or potential soil and drainage issues As @ October 2021 considered CLOSED based on evidence collected below.</u></p> <p>12d software and 3-D models had been created, demonstrating profile and 1V:2H batter slopes, with Engineering Designer's memo showing existing and proposed flow path overlays of ground contours not impeding drainage parts, particularly the small gully leading from Ferrers Road to the existing culvert entering the Warragamba pipeline.</p> <p>Landscaping treatment (turf) and construction methodology including compaction testing were defined and/or implemented, the latter in E50 further.</p> <p>NOTED: There were no plans to install additional drainage as alluded to in the response to EIS submissions (7.9.1 page 109) - this did not appear to be warranted based on observations and information cited during <u>this</u> audit.</p>	Compliant	
	Contaminated sites				
E36	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and must be followed should unexpected, contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	<ul style="list-style-type: none"> Unexpected Finds Soil Contamination and Asbestos Procedure dated December 2020 	<p>Unexpected Finds Soil Contamination and Asbestos Procedure was available as Annexure D of the Construction Soil & Surface Water Management Sub Plan.</p> <p>Procedure was followed during asbestos finds throughout construction, plus recent other contamination issues per E37 below</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E37	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	<ul style="list-style-type: none"> Asbestos Management Plan by Hibbs, v5 dated 0207/2021. ADE Onsite Visual Asbestos Clearance certificates dated 19/5, 13/9, & 7/10/2021 Initial IEA Report dated 30-06-21 evidenced formal Asbestos Material Clearance Inspection Reports from ADE 	Hibbs & Associates and ADE Consulting Group had been engaged as required by the Unexpected Finds Soil Contamination and Asbestos Procedure (as well as REMM C3). ADE was actively involved given ongoing asbestos discoveries, with a 3 rd contamination cell being established onsite. Implementation records included verification and clearance records et al.	Compliant	
E38	The Proponent must engage an NSW EPA accredited Site Auditor to ensure that any work required in relation to soil, groundwater, or ground gas contamination is appropriately managed	Consultancy Agreement #5 with: <ul style="list-style-type: none"> Zoic Environmental dated 01/06/2021 Professional Services Agreement N235/006 with: <ul style="list-style-type: none"> ADE Consulting Group dated 24/09/2021 	The Construction Contractor had engaged specialists as follows: <ul style="list-style-type: none"> Kylie Lloyd, NSW EPA Auditor accreditation 0302 of Geosyntec Consultants (formerly Zoic Ltd) to provide EPA Site Auditor services ADE for the assessment of soil materials, groundwater and hazardous ground gases 	Compliant	
E39	The Proponent must obtain a Section A1 Site Audit Statement - or a Section A2 Site Audit Statement accompanied by an Environment Management Plan from the Site Auditor and submit it to the Environmental Representative and Planning Secretary before the commencement of operation. The Site Audit Statement must certify the site is suitable for the proposed use.	<ul style="list-style-type: none"> Environment Management Plan, Southern Containment Cell (Carpark B) v1f of 04/08/21 Interim Advice notes: <ul style="list-style-type: none"> 21037 IA1 of 10 Aug 21 21037 IA2 of 10 Aug 21 21037 IA3 of 16 Aug 21 21037 IA4, undated table of Site Auditor review of ADE's IA3 responses ADE Proposed Sample Location Plan dated 22/07/21 	The NSW EPA accredited Site Auditor was also noted as actively advising Abergeldie and ADE with respect to asbestos cap and cover remedial works plus hydrocarbon gas flow resultant from Speedway OSD and carpark works. In preparation for Site Audit Statement certification, the first Environment Management Plan had been developed, with additional soil plus groundwater and gas monitoring sites / wells being assessed in accordance with the ADE Proposed Sampling Analysis Quality Plan (results in progress, not sighted)	Compliant	
Utilities Management					
E40	Nothing in this approval permits the carrying out of any utility work that is not described in the documents listed in Condition A			Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Urban Design, Visual Amenity Sustainability				
E41	<p>The SSI must be designed and built, in consultation with the Western Sydney Parklands Trust and Council, having regards to the:</p> <ol style="list-style-type: none"> Western Sydney Parklands SEPP; Western Sydney Parklands Urban Design Manual (2020), including sustainability considerations; Good design outcomes in Better Placed (NSW Government Architect, 2017); and Principles of green infrastructure and outcomes in draft Greener Places (NSW Government Architect, 2020). 	<ul style="list-style-type: none"> Landscape designs, elsewhere in this report Metro>WSPT email entitled "Landscaping plant species" of 21-07-2020. Designers Memo for Landscape Design 	<p>Initial IEA Report dated 30-06-21 noted the following: <i>Correspondence with WSPT evidenced consultation with WSPT regarding landscaping plant species, and lengthy leads times for orders. Design memo is 3.9 Landscape Design showed adherence to WSPT Master Plan including selection from WSPT endemic species list etc.</i></p> <p>Evidence alongside and referenced elsewhere in <u>this</u> report seem to indicate general compliance / consideration of WSPT and other consent documentation.</p> <p>Note - carpark perimeter vegetation was not entirely in accordance with the Design Manual however – refer section 4.4.1 of this report relating to Visual Amenity/</p>	Compliant	
E42	<p>Lighting & Security</p> <p>The Proponent must construct and operate the SSI with the objective of minimising light spill to surrounding properties and effects on foraging behaviour or flight paths of nocturnal bird and bats known to utilise Prospect Nature Reserve.</p> <p>All lighting associated with the construction and operation of the SSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting ,relevant Australian Standards in the series AS/NZ 1158 - Lighting for Roads and Public Spaces and give consideration to the National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds (Commonwealth of Australia 2020).</p> <p>Additionally, the Proponent must mitigate residual night lighting impacts to protect existing or approved (as at the date of this approval) properties adjacent to the SSI and must consult with affected landowners.</p>	<p>Evidence collected below relates to car park lighting design information:</p> <p>Lighting Design Certifications by Webb Consulting Engineers dated 23/06/2021 of Western Sydney Parklands Design Manual and:</p> <ul style="list-style-type: none"> Competitor Carpark B Lighting Layout drawings P480D-ES-02, revision A Speedway Carpark A Solar Lighting Layout drawings P480C-ES-02, revision A Dragway Carpark C D1 and D2 Lighting Layout drawings P480B-ES-04 & 05, revision D <p>Lighting designs, included but was not limited to:</p> <ul style="list-style-type: none"> Carpark B lighting layout drawing P480D-ES-02, preliminary issue, rev A dated 10-05-21 Apex Lighting Carpark B Lighting Calculations dated 11-05-21 (Webb) Carpark A lighting layout drawing P480B-ES-02, preliminary issue, rev C dated 17-03-21 DNS Lighting Carpark B Lighting Calculations dated 09-03-21 Apex Lighting Carpark C lighting layout drawing P480B-ES-03, for approval, rev D, 30-03-21 	<p>Evidence reviewed focussed on carparks, not other areas, given proximity to known wildlife areas.</p> <p>Lighting Design Certifications were limited to only one (1) of the required consent condition references (AS/NZ 1158) as compliant but did not include certification of.</p> <ul style="list-style-type: none"> AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting * Commonwealth of Australia 2020 National Light Pollution Guidelines for Wildlife <p>Lighting design, performance</p> <p>There was limited evidence to demonstrate that lighting designs achieved required outcomes and performance in terms of minimising impacts in the context of environmentally sensitive areas e.g.</p> <ul style="list-style-type: none"> AS 4282 "Zone" was confirmed, but calculations were limited to a Glare computation i.e. single table categorisation confirmation and one (1) computation, this from ta 48-page Australian Standard specification Drawing and specifications reviewed and assessed showed that car park light posts and luminaires would be taller and brighter than expected given perimeter location 	Non-compliant	NC-13

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		<ul style="list-style-type: none"> Apex Lighting Carpark C Lighting Calculations dated 06-05-21 <p>Luminaire specifications</p> <ul style="list-style-type: none"> Product Technical Specification - Phillips ClearFlood large, LED module, 75000 lumens (SMWSPC-ACI-DRFI-000516-00-11) Product specification - Phillips GreenVision Exceed Gen 2, LED, 36 lumens <p>Consult with affected landowners</p> <ul style="list-style-type: none"> No evidence collected 	<p>rather than decentralised distribution given carpark repurposing due to alternative operational / commercial uses (event staging).</p> <p>Luminaire specifications</p> <ul style="list-style-type: none"> High intensity white LEDs were specified which are predominantly of short wavelength blue spectrum, detrimental to wildlife. Given perimeter locations, luminous intensity contours and light spill might have some impact on retained vegetation associated with identified nocturnal species. <p>Consult with affected landowners to minimise night lighting impacts</p> <ul style="list-style-type: none"> No evidence was provided of consultation with landowners potentially impacted by residual night lighting. 		
E43	Operational maintenance and transfer of assets. <i>Requirements not articulated in <u>this</u> report for brevity purposes</i>			Not Triggered	
E44	Urban Heat Island Effects and Sustainability The Proponent must ensure that the SSI design minimises impacts to visual amenity, the increase in impervious surfaces and maximises shade to avoid heat island effects.	<ul style="list-style-type: none"> 	The design and landscaping once implemented reflected a significant reduction in predicted numbers of new tree plantings. This, together with a significant increase in infrastructure impervious surfaces especially large car park areas did not satisfy obligations regarding Heat Island Effect minimisation, including provision of shade trees and the minimisation of Visual Amenity impacts as detailed below:	Non-compliant	NC-14
As above	Impact minimisation (impervious surfaces), as above	<ul style="list-style-type: none"> Survey plots from Pacific Survey dated 18 March 2021: <ul style="list-style-type: none"> Pavement Areas Car Parks D1 D2 Pavement Areas Car Park C Pavement Areas Speedway, incl. Carparks A & B Vegetation Take-off by Pacific Survey dated 6 November 2020 	<p>Increase in impervious surfaces not minimised:</p> <p>The original 230,000 m² site was predominantly undeveloped pre-SSI with most surfaces either pervious soil or vegetation, existing roads excluded. However, the design captured by the project surveyor confirmed as-built infrastructure to be:</p> <ul style="list-style-type: none"> Predominantly asphalt and similar hard surfaces typically in operational areas and large car parks, changing previously pervious areas and increasing impervious area by over 130,000 m² As a positive, landscaping treatments including turf inside the speedway circuit would retain and/or create over 53,000 m² of impervious (soft) surface area though. 	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	Impact minimisation (visual), as above	<p>Landscape documentation package (by Turf Design Studio) including:</p> <ul style="list-style-type: none"> Cover Sheet L-000 IFC revision 4, dated 17-03-21 GA drawings L-201 to 209, varied revisions Planting Schedule L-550, IFC rev 2, dated 24-02-21 <p>• Appendix G photograph 3</p>	<p>Visual amenity impacts not minimised: noting that:</p> <ol style="list-style-type: none"> The SIS Submission Report @ 6.11.1 stated that over 1,000 new trees will be planted. EIS Volume 1, Urban Design Strategy @ s12.4 stated that in addressing the principles of the Western Sydney Parklands Urban Design Manual (E41b above) re planting along perimeters of asphalted areas: <ul style="list-style-type: none"> "car parking areas would be surrounded by endemic vegetation" and also proposing "dense vegetation along the perimeter of each large car park". <p>Evidence (Collected columns left / alongside) around soft landscaping including screening trees differed to that proposed i.e.</p> <ul style="list-style-type: none"> The planting of 346 canopy trees, 205 understory trees and a combination of other gardening plantings and turf planted represents a 45% reduction in EIS proposed new tree plantings Tree screening was largely omitted from most Dragway car park perimeters with terralink walls utilised instead 2x amplified stormwater batter chutes will expose the 6m RSV wall to Ferrers Road for some time until trees mature - refer to Appendix G photograph 3 Modified arrangements around southern competitor exit did not appear to provide any screening of the workshop at the time of <u>this</u> audit, and neither had the landscaping drawings reflected this change. 	As above	
As above	Impact minimisation (heat island effects), as above		<p>Limited shade provided (to avoid heat island effects): Heat island effect minimisation was limited to shade cloth above the Playground Area and Grandstand / Pit area overhangs, noting:</p> <ul style="list-style-type: none"> No shade trees were utilised in carparks due to re-purposing for other motorsport related events Low heat absorbing surfaces had not been used for any carparks The above-mentioned is also a specified REMM LV2 requirement. 	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Waste				
E45	Waste generated during construction and operation must be dealt with in accordance with the following priorities: a) waste generation must be avoided and where avoidance is not reasonably practicable, must be reduced; b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	<ul style="list-style-type: none"> Grasshopper (contractor) Monthly Waste Diversion Reports for the project as @ October 2021 	<p>Comprehensive Waste Diversion Report was provided by the waste contractor, these demonstrating monthly data and project to date breakdowns of resource recovery streams.</p> <p>Around 92,000 m³ of excavated material was nearing delivery completion for reuse at the Speedway Precast Facility.</p>	Compliant	
E46	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	<ul style="list-style-type: none"> N235 ENV005-F01 Waste and Material Tracking Log rev1 Various Delivery Docket receipts, scans (on file) 	<p>A Waste and Material Tracking Log continued to be used reflecting export classification, disposal, source or storage location and Docket Number/Rego as applicable. Noting that since the last audit, most of the asbestos-containing material was being placed into on-site cells, with exports predominantly of ENM to the Precast Facility.</p> <p>ACM waste tracking including Environment Protection Licences was assessed during the prior IEA when subject waste was being disposed of at that time.</p>	Compliant	
E47	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<ul style="list-style-type: none"> ADE Consulting Group Waste Analysis & Classification Reports series WAC 1 to 10 between 4 to 18 June 2021 	ACM waste classification (of above waste) had been undertaken by Alliance, claiming that Laboratory data was assessed against NSW EPA (2014) Waste Classification Guidelines.	Compliant	
	Water Quality impacts				
E48	The SSI must be designed, constructed and operated so as to maintain the <i>NSW Water Quality Objectives</i> where they are being achieved as at the date of this approval, and contribute towards achievement of the <i>NSW Water Quality Objectives</i> over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the SSI contains different requirements in relation to the <i>NSW</i>	<ul style="list-style-type: none"> Refer Appendix G – photo 11 Ocean Protect Stormwater filter drawing set incl. 15564-19C-3250SFMH-690-6B et al (9 of) Stormwater Management profile drawings SM 0239 and 0240 Turnbull Stormwater Water Quality & Drainage design MEMO 0111 dated 15/01/2021. Stormwater Management General Arrangement Plan drawings 0013/11814 Issue 6 dated 5/2/21 	<p>Further to stormwater design around water quality impacts assessed during the initial IEA, evidence were sighted of Ocean Protect Stormwater filter systems being installed.</p> <p>These were custom designed comprising between 12 and 24 filtration cartridges</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	<i>Water Quality Objectives</i> , in which case those requirements must be complied with.	<ul style="list-style-type: none"> Contractor image library of: <ul style="list-style-type: none"> Concrete wash-out Hazchem (chemical storage) container Bunded top of stockpile Wheel Wash, Rumble grid, stabilised entry etc, 			
E49	All new or modified drainage systems associated with the construction and operation of the SSI (including but not limited to, watercourse crossings, stream diversions, drainage swales and depressions) must be designed and carried out in accordance with Sydney Water standards and any relevant guidelines, to meet capacity constraints of council and Sydney Water's drainage systems, minimise impacts on the receiving environment and be designed by a suitably qualified and experienced person.	<ul style="list-style-type: none"> Abergeldie Rehabilitation SOW for relining dated December 2020 375mm and 525mm Post Survey CCTV of 25/05/21 Stormwater Management General Arrangement Plan drawings 0013/11814 Issue 6 dated 5/2/21 Mark Cameron's CV Metro>BCC email entitled "Stormwater Drainage Design" of 15-02-2021. 	<p>With most stormwater impacting BCC lands, Sydney Metro had provided council with stormwater drainage designs for information.</p> <p>Interfacing with existing Sydney Water stormwater systems appeared to be minimal, however evidence was provided of works relating to relining a section of stormwater piping from culvert EC58 to EC57 (DN525) & culvert EC57 to EC57B (DN375) i.e. leading from the Dragway.</p> <p>The stormwater drainage design had been completed by Turnbull Engineering, a suitably qualified and experienced person evidenced by CV of their specialist Principal Flooding and Drainage Engineer.</p>	Compliant	
E50	The stockpile on Lot 1 DP 1077822 must be designed and constructed to ensure that no additional surface run off enters the Warragamba pipeline corridor.	<ul style="list-style-type: none"> Refer also to Condition E35 evidence above Pacific Survey Ferrers Road Stockpile Volume survey, dated 25/09/2021 Ferrers Stockpile Grading Levels by Pacific Survey dated 25 September 2021 Turf Design Studio Landscape GA Drawing L-209 Sheet 9, rev 1 Issue for Construction dated 6/11/2020 Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21 3D model images, Teambinder reference SMWSPC-SMD-SPY-EW-SKE-000153.-.INF.-.01 	<p>The stockpile had been initially formed since the last audit (refer Appendix G photos), with material volume noted as approx. 33,453m³</p> <p><u>Non-compliance NC-08 was raised in Initial IEA Report dated 30-06-21 due to there being no construction plan including surface water drainage specification to (demonstrate and) ensure that surface water run-off would not enter the Warragamba pipeline corridor</u></p> <p><u>As @ October 2021 considered CLOSED based on evidence collected below.</u></p> <ul style="list-style-type: none"> Engineering Designer's memo showed existing and proposed flow path overlays of ground contours 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		<u>Contractor Inspection & Test Plan (records):</u> <ul style="list-style-type: none"> ITC's for Southern Stockpile, Layers 1 – 7 February-March 2021 <u>Alliance Geotechnical Solutions Material Testing Reports (compaction):</u> <ul style="list-style-type: none"> NATA Laboratory Test reports for each Stockpile Layer 1 – 7 dated May 2021 	<ul style="list-style-type: none"> Construction methodology followed ITP's showing compaction testing, quality assurance and conformance to RMS 44 3D Model images Condition E35 evidence above 		
E51	<p>If damage to the Warragamba pipeline corridor or associated bulk water supply infrastructure occurs as a result of the construction of the SSI, the Proponent must either (at the landowner's discretion):</p> <p>(a) compensate the landowner for the damage so caused. The amount of compensation may be agreed with the landowner, but compensation must be paid even if no agreement is reached; or</p> <p>(b) rectify the damage to restore the road to at least the condition it was in pre-construction.</p>	<ul style="list-style-type: none"> SSI 10048 Planning Approval Allocation spreadsheet dated 23/12/20. General correspondence SMWSPC-SMD-SPC-SMD-GEN-000056 dated request for Allocation confirmation dated 15/01/21. Final GC21 Execution version of Schedule 20 Baseline Planning Approval Conditions B3 (27/07/20) 	<p>Initial IEA Report dated 30-06-21 reported:</p> <p><i>There was no objective evidence to demonstrate formal accountability, assessment and provisioning for inadvertent Warragamba Pipeline or corridor damage during construction, including formal acceptance of Planning Approval obligations by the contractor i.e.</i></p> <ul style="list-style-type: none"> Contract Schedule 20 omits Condition E51. No formal contractor acknowledgement to SM "General Correspondence" Teambinder request to confirm allocation of Planning Approval The executed contract did not demonstrate definitive acceptance of Condition E51 No Dilapidation/Asset Condition Survey of said corridor road had been undertaken. 	Not triggered	

APPENDIX F: Audit Findings (Revised Environmental Mitigation Measures)

REMM's verified through assessment of Management Plan implementation of Appendix C, plus other consent conditions, as well as during the initial IEA are not reflected herein. The remainder below are reported by exception based on IEA perceived risk, uniqueness, not implicit in consent conditions or inapplicability at the time.

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		VISUAL AMENITY & SUSTAINABILITY			
LV1	Opportunities to minimise the area of vegetation clearance and for the retention and protection of existing street trees and trees within the project site would be identified during detailed construction planning.	<ul style="list-style-type: none"> Refer section 4.4.2 Consistency Assessment - SIS 02 Drainage Design Footprint, approved 25/02/21. Refer Appendix G, photo 3 	<p>No evidence was provided of any detailed construction planning process such as workshops and options analysis to demonstrate vegetation clearance minimisation being considered, noting:</p> <ul style="list-style-type: none"> Section 4.4.2 of <u>this</u> report reflects more native vegetation clearing than that predicted. <p>It was acknowledged that some stormwater design routing had been changed to divert around protected areas, plus:</p> <ul style="list-style-type: none"> Batter Chute Consistency Assessment SIS 02 Drainage Design indicated consideration of another construction method. <p><u>Proponent response to draft report:</u> <i>Change 'no' to 'limited', noting additional clearance for batter shoots was assessed as consistent with the Approved EIS.</i></p> <p><u>Independent Auditors view:</u> <i>Consistency Assessment Justification section 6 only summarised one (1) only alternative methodology which was dismissed, there being no proof provided of contractor construction details on this or other options such as directional boring, or relocation of drain location chainage to minimise the one and only Southern Myotis (threatened species) foraging habitat on the project, of which 157 m² extra was cleared. Furthermore there were other areas cleared amounting to 1,299 m² some of threatened Ecological Community (TEC), again no proof provided of planning and options being considered.</i></p> <p><i>In summary - whilst limited justification was noted above, for the project as a whole there was no proof of construction planning consideration as compliance evidence, plus the abovementioned Consistency Assessment is considered to be inconsistent. As courtesy to the Proponent, the Audit Finding wording has been revised to provide more clarity.</i></p>	Non-compliant	NC-15

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
LV2	Opportunities for the incorporation of trees and low heat absorbing ground surface finishes in carparking areas would be identified and implemented where feasible and reasonable.		No heat absorbing ground surfaces were provided in any of the car parking areas, neither were trees incorporated - refer also to E44 - refer also to Appendix E (Condition E44) above.	Non-compliant	NC-16
LV3	Where feasible and reasonable, the elements within the construction site would be located to minimise visual impacts (for example storing materials and machinery behind fencing).	<ul style="list-style-type: none"> Initial IEA Report dated 30-06-21 ER and Contractor Inspection reports - refer A22 (e and C7) 	Refer site inspections, compliance noted during <u>this</u> IEA site inspection	Compliant	
LV4	Lighting of the construction site would be orientated to minimise glare and light spill impacts on adjacent receivers.	<ul style="list-style-type: none"> Initial IEA Report dated 30-06-21 	Light spill precautions noted for wildlife, there being no material impacts to adjacent receivers.	Compliant	
LV5	Existing trees to be retained would be protected prior to the commencement of construction in accordance with Australian Standard AS4970 the Australian Standard for Protection of Trees on Development Sites and Adjoining Properties.		As above, LV3	Compliant	
		BIODIVERSITY			
B1	Opportunities to minimise the amount of vegetation clearance within the project site would be considered as part of further design development where feasible and reasonable.	<ul style="list-style-type: none"> Consistency Assessment, SIS 02 Drainage Design Footprint, approved 25-2-21. Initial IEA Report dated 30-06-21 (Abergeldie photo of retained tree). 	No evidence was provided of any design development reviews or workshops to demonstrate vegetation clearance minimisation opportunities being considered, noting: <ul style="list-style-type: none"> Some stormwater design routing had been changed to divert around protected areas Section 4.4.2 of this report reflects more native vegetation clearing than that predicted. 	Non-compliant	NC-17
B2	Biodiversity offsets (ecosystem credits) would be acquired in accordance with the Biodiversity Assessment Method due to impacts on native vegetation.	<ul style="list-style-type: none"> CA above and BAM Credit Summary Report dated 16-2-2021 attachment 	Jacobs utilised the BAM Calculator in the confirmation of credits needed/available with respect to a Consistency Assessment. Otherwise, refer to prior Appendix, E13.	Compliant	
		TRAFFIC & TRANSPORT			
TTP1	In the event of a traffic related incident, coordination would be carried out with Transport Coordination and/or the Transport Management Centre's Operations Manager.	<ul style="list-style-type: none"> CTMP referenced previously 	Construction Traffic Management Plan section 23 requires notification to the TMC and Appendix 1, Emergency Response Plan.	Not triggered	
TTP2	Access to other properties within Western Sydney Parklands' Precinct 5: Eastern Creek Motor Sports would be provided at all times, including for emergency vehicles.	<ul style="list-style-type: none"> Initial IEA Report dated 30-06-21 Site inspection in general, precinct observations during this audit 	No practical instances observed where there would be access issues.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
TTP3	All trucks would enter and exit construction sites in a forward direction, where feasible and reasonable.	<ul style="list-style-type: none"> Site inspection during this audit Vehicle Management Plans 09-03, 17-03 and 07-04 	Forward direction during exit and entry to site observed, there being no practical instances where this would otherwise occur. VMPs indicated required movements and the case of Pipeline Park (permanent stockpile) entry via Gate 5 and exit through Gate 6 prevented the need for reversing.	Compliant	
TTP4	Construction site traffic would be managed to minimise movements along Ferrers Road and the surrounding road network during peak periods.	<ul style="list-style-type: none"> Vehicle number Spreadsheet from 23/8/21 to 25/10/21 Carpark D1 Truck Number Export Graphing Daily Load Run Sheets to Precast from 24/6/21 to 1/11/21 	Daily movement ramp-up, peak and close-down protocol implemented, with slow start to the day and tailing off completion appearing to address potential peak period impacts – this addressing Non-compliance NC-09 of Initial IEA Report dated 30-06-21	Compliant	
TTP5	Parking for construction personnel would be provided on-site and not on surrounding local streets.	<ul style="list-style-type: none"> Initial IEA Report dated 30-06-21 Site inspection during this audit 	Ample onsite parking available and observed	Compliant	
TTP6	During major events at Sydney Dragway, impacts to the transport and traffic network would be reduced by (as necessary): <ul style="list-style-type: none"> Avoiding the use of the spectator access road by construction traffic during Sydney Dragway major events Minimising the level and nature of construction activity pre, during and post events Maintaining appropriate access to all areas within the Western Sydney Parklands Precinct 5: Eastern Creek Motor Sports Scheduling deliveries to the project site outside of event periods, when possible. 	<ul style="list-style-type: none"> Site Project Control Group meeting minutes of 5th October 2021 Abergeldie Environment Coordinator "Delivery Timing " reminder email dated 22/9/21 <p><u>Initial IEA Report dated 30-06-21</u></p> <ul style="list-style-type: none"> Principal Contractor handovers of 11/12/2020 and 7/01/2021 & 12/03/2021 Abergeldie Superintendent reminder email dated 8/4/21 	<p>PCG meeting minutes reflected planning for Sydney Dragway and related precinct events, including discussions around parking and shuttle buses.</p> <p>Process and documentation indicated planning and formal handover with Sydney Dragway, evidencing reduction of construction activities.</p> <p>Deliveries to site appeared to be minimised with emails sent to project team to advise suppliers accordingly.</p>	Compliant	
TTP7	Temporary offset parking for Sydney Dragway would be established prior to commencement of construction. This would include a total of around 2400 dedicated parking spaces for Sydney Dragway comprising of: <ul style="list-style-type: none"> Retention of about 800 existing spaces in the existing P2 Dragway car park outside of the project footprint A minimum of 1600 spaces within the project site for use by visitors to Sydney Dragway during events. For larger events at Sydney Dragway, additional parking spaces within the Sydney Motorsports Park (operated by the Australian Racing Drivers Club) would also be made available. During these events, a shuttle bus service would be provided between this parking and the Sydney Dragway. 	<ul style="list-style-type: none"> Initial IEA Report dated 30-06-21 Site Project Control Group meeting minutes of 5th October 2021 Car Slots Car Park D2, Surveyor plot, undated Line marking design for Temporary Carpark 2, undated 	<p>Initial IEA Report dated 30-06-21 confirmed process including Principal Contractor Handover form, item 18 evidencing event parking checks.</p> <p>PCG meeting minutes reflected planning for Sydney Dragway and related precinct events, including discussions around parking and shuttle buses.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		WASTE			
WM1	Waste would be assessed, classified, managed, transported and disposed of in accordance with the Waste Classification Guidelines and Protection of the Environment Operations (Waste) Regulation 2014.	<ul style="list-style-type: none"> Refer Appendix E herein 	To the extent applicable, evidence against E47 demonstrated compliance	Compliant	
WM2	Waste streams would be segregated to avoid cross contamination of materials and maximise reuse and recycling opportunities.	<ul style="list-style-type: none"> N235 Monthly Reports - June, July & August 2021 D1 Material to Precast Tracking spreadsheet Site inspection during this audit ER and Contractor Inspection reports - refer A22 (e and C7) 	Sighted as practically implemented through site inspections. Formally evidenced through sustainability reports indicating data on waste generated, reused or exported, disposed to landfill etc.	Compliant	
WM4	A material tracking system would be implemented for material transferred to offsite locations such as licensed waste management facilities.	<ul style="list-style-type: none"> N235 ENV005-F01 Waste and Material Tracking Log 	Waste and Material Tracking Log reflected tracking, backed up by disposal / facility receipt documentation 0 - refer Appendix E, condition E46	Compliant	
		WATER QUALITY MONITORING			
SSW5	<p>An onsite surface water monitoring program would be implemented to observe any changes in the quality of runoff from the project site prior to discharge.</p> <p>The program would be developed in consultation with the EPA and Blacktown City Council, where required. Monitoring would occur at all points of discharge within the project site and would include sampling for key indicators of concern.</p>	<p>Information and records per Appendix C above:</p> <ul style="list-style-type: none"> Environment Inspection (checklist) reports, incl 24/3/2021 Dewatering Inspection Checklist records 	<p>Apart from one minor incident there was little offsite release due to onsite storage, engineering and natural controls and/or filtering. Required discharges were controlled through dewatering inspections and associated forms / records of Appendix C.</p> <p>As raised during the last IEA, site environment functions still did not gather photographic evidence or otherwise to demonstrate that visual observations of surface water run-off quality had been undertaken during rain events at off-site locations identified in figure 5 of the CSWMP s 7 Environment Mitigation & Management Measures in particular Table 9 requiring that:</p> <p><i>"During rain events when water is discharging from the site (and if safe to do so), daily visual assessments will be made of water quality in the unnamed drainage line between Carpark C and Carpark D (if any flows occur), Eastern Creek and Prospect Reservoir (if accessible)) and along site boundaries to check for any potential impacts of discharges from the site, including comparing upstream and downstream locations. Locations for potential visual monitoring are shown in Figure 5.</i></p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
		GROUNDWATER and HYDROLOGY			
GW2	A geotechnical assessment, contamination assessment and earthworks design would ensure that long-term leaching of excavated materials (such as acid rock drainage from Bringelly Shale and saline soil and rock) does not pose a risk to groundwater.	<ul style="list-style-type: none"> Factual Contamination Assessment Report, Golder-Douglas Partners dated 14/5/2020. Geotechnical Interpretive Report, Golder-Douglas Partners dated 25/5/2020 	<p>Initial IEA Report dated 30-06-21 noted: Geotechnical and contamination assessments were undertaken, with the Interpretive Report seemingly indicating low risk to groundwater, the paragraph at 10.4 stating:</p> <p><i>“Although groundwater is relatively deep at this site (<10m) there may be seasonally elevated perched water tables in full materials. These perched water systems could impact retaining walls and excavation for slopes and obligations”</i></p>	Compliant	
		GREENHOUSE GASES & ENERGY			
GHG1	Energy efficiency would be considered further during detailed design development, with energy efficient systems installed where feasible and reasonable. This would include consideration to the use of motion sensor activated and/or independent solar powered CCTV systems and LED lighting technology.	<ul style="list-style-type: none"> Refer to Lighting designs, Appendix E, consent condition E42. Product specification - Phillips GreenVision Exceed Gen 2, LED Product Technical Specification - Phillips ClearFlood large, LED module, 	Extensive use of LED lighting was specified, especially in the carparks. No other energy efficient designs such as motion sensors and/or independent solar powered CCTV systems were apparent / provided as evidence, noting the project did also have security and reliable energy sources as a practical requirement however	Compliant	
GHG2	Opportunities to optimise the project design to minimise greenhouse gas emissions during operation would be considered during design development, including considerations relating to: <ul style="list-style-type: none"> Track design to minimise ongoing plant maintenance. Waste management strategy and design to minimise waste to landfill during operation. 	<ul style="list-style-type: none"> Pavement Profile detail drawing PV 0201 dated 2/12/2020 	<p>Initial IEA Report dated 30-06-21 noted: <i>Pavement drawings showed cross section of the track pavement, with 500mm of clay for the topping designed to minimise the need for significant rework by plant.</i></p> <p><i>Operational waste minimisation did not appear to be reasonable or practical and did not appear to be covered.</i></p>	Compliant	
		ABORIGINAL HERITAGE			
AH1	Prior to the commencement of construction works, exclusion areas would be established around the following identified Aboriginal sites, to prevent inadvertent impacts during works: <ul style="list-style-type: none"> SIS PAD 01 (AHIMS ID pending) SIS PAD 02 (AHIMS ID pending) 	<ul style="list-style-type: none"> Site inspection during both audits 	Area north of permanent stockpile observed to be beyond project, with active works demarcated by silt fencing.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
AH2	Should unexpected Aboriginal artefacts be identified during excavation and construction works, the Sydney Metro Unexpected Finds Protocol would be implemented.			Not triggered	
AH3	In the event that a potential burial site or potential human skeletal material is exposed during construction, the Sydney Metro Exhumation Management Plan would be implemented.			Not triggered	

APPENDIX G: Audit Findings (Site Inspection Photographs)

A **snapshot** sample of observations taken during the 2 site inspections follows:

Photo 1 – Vehicle Management Plan non-compliance

Ute contravening no right turn into Ferrers Rd



Thursday, 7 October 2021, 11:03:51 AM

Photo 2 – Vehicle Management Plan non-compliance

Truck below, later exited in same direction, contravening VMP



Thursday, 7 October 2021, 11:00:46 AM

Photo 3 – Visual Amenity impact

Batter Shute 1 or 2. Visual impact would continue for some time, even with tree planting in front of concrete wall and removal of white geofabric. Project Consistency Assessment asserted otherwise.



Thursday, 7 October 2021, 11:22:25 AM

Photo 4 – Offsite impact

As a positive construction performance observation, the pond in the minor water way west of the Ferrers Road culvert and downstream from Carpark D and C was observed to be of relative clear with no evidence of mud / silt



Thursday, 7 October 2021, 11:40:26 AM

Photo 5 – ERSED controls



Thursday, 7 October 2021, 9:42:26 AM

Photo 6 – Outlet scour and works protection



Thursday, 7 October 2021, 9:43:02 AM

Photo 7 – Spoil Management

Carpark D1 loading on haulage truck & trailers, plus (white) contamination coverage in background



Thursday, 7 October 2021, 10:25:25 AM

Photo 8 – Spoil & Contamination Management

D1 Contamination inspection (service provider in attendance top left), segregation and bund creation



Thursday, 7 October 2021, 10:11:34 AM

Photo 9 – Permanent Stockpile creation

Stockpile forming ramp, pipeline in background plus SSI gate/signage



Thursday, 7 October 2021, 10:57:28 AM

Photo 10 – Permanent Stockpile controls

View from the top of stockpile towards pipeline, earthen bund and silt curtain evident as was unimpeded natural watercourse crane



Friday, 15 October 2021, 9:13:32 AM

Photo 11 – Stormwater quality protection

Example of several Storm Filters installed pre-stormwater discharge - to contain media-filled cartridges to absorb pollutants



Friday, 15 October 2021, 8:14:14 AM

Photo 12 – Speedway light & dust screen posts

Light poles (foreground) and posts for dust screens (background) alongside Dragway track perimeter



Friday, 15 October 2021, 8:47:28 AM

Annexure 1: Planning Secretary Auditor Agreement



Planning,
Industry &
Environment

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

Sydney Metro
PO Box K669
Haymarket NSW 1240

09/04/2021

Dear Mr Brookes

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

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

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

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

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

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

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

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

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

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

Yours sincerely

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

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Annexure 2: Stakeholder Consultation

From: Alex McGuirk <Alex.McGuirk@dpie.nsw.gov.au>
Sent: Tuesday, 5 October 2021 6:20 PM
To: Larry Weiss
Subject: RE: Consultation - Sydney International Speedway project (CSSI 10048)

Hi Larry,

Thank you for consulting with the Department of Planning, Industry and Environment (Department) on the scope of the audit. In addition to the stakeholders you have identified below, the Department requests that you consult with Blacktown City Council.

Please ensure the audit is conducted in accordance with Condition A29 of Development Consent SSI-10048, which requires the audit to be carried out in accordance with the Independent Audit Post Approval Requirements (May, 2020). Consistent with section 3.3 of those requirements, please ensure:

- All conditions applicable to the current phase (construction) are audited
- The environmental performance of the development is assessed, including but not limited to actual versus predicted impacts
- The status of the previous independent audit findings, recommendations and actions is included
- A high level assessment of the environmental management plans/sub-plans is included
- Noting the previous independent audit findings and recommendations in relation to biodiversity and native vegetation clearing, detailed design assurance, spoil haulage and road network performance, and reviews of management plans and monitoring programs, the Department considers these matters to be particularly relevant.

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

Alex McGuirk
Senior Compliance Officer
Planning & Assessment | Department of Planning, Industry and Environment
Locked Bag 5022 | PARRAMATTA NSW 2124
www.dpie.nsw.gov.au



Planning,
Industry &
Environment

From: Larry Weiss <IEAuditor@biepond.com>
Sent: Thursday, 9 September 2021 3:16 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Consultation - Sydney International Speedway project (CSSI 10048)

Dear Compliance team

Planning Approval CSSI 10048 and Independent Audit PAR (2020) section 3.2 regarding key stakeholder consultation has reference.

It would be appreciated if the Department could provide stakeholder input regarding the scope of the 2nd Independent Environmental Audit of the Sydney International Speedway project. The audit is planned to commenced on or around 7th October 2021.

DPIE scope input

- Regarding the audit scope, are there any specific focus areas that the Department would like included in the audit scope?
- Furthermore, Department guidance on the extent of coverage required for all non-operational Consent Conditions and REMMs would be appreciated – noting that this might also be the final audit required by the CSSI approval and PAR.

Other project stakeholders, consultation and input

- As minimum, the intention is to consult with the 4 key stakeholders as undertaken in the initial audit i.e. Water NSW, Environment Energy & Science Group, Sydney Water and Western Sydney Parkland Trust.
- As per PAR 3.2 requirements, are there any other parties or agencies the Department requests to be consulted?

I look forward to your response, ideally by Thursday 30th September if possible.

Sincerley

Larry Weiss | Independent Environmental Auditor |
QEM Consulting Pty Ltd | 3 Erawar Close, Westleigh, NSW 2120 |
Mobile: 0409 411 811
Email: IEAuditor@bigpond.com

P.T.O

From: Justine Clarke <Justine.Clarke@waterNSW.com.au>
Sent: Monday, 13 September 2021 10:32 AM
To: Larry Weiss
Subject: RE: NEW Consultation request - Sydney International Speedway project (CSSI 10048)

Thanks Larry.

WaterNSW have no further comment (apart from the last), but would be interested to be notified when the report is put on the website.

Regards Justine

Justine Clarke
Catchment and Asset Protection Adviser

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



Level 14, 169 Macquarie Street
PO Box 398
Parramatta NSW 2150
M: 0457 535 955
justine.clarke@waterNSW.com.au
www.waterNSW.com.au

From: Peter Marshall <petermarshall@optusnet.com.au>
Sent: Friday, 10 September 2021 5:51 AM
To: 'Larry Weiss' <IEAuditor@bigpond.com>
Cc: Lorraine Chirawu <LORRAINE.CHIRAWU@transport.nsw.gov.au>
Subject: RE: WSPT Consultation request - Sydney International Speedway project (CSSI 10048)

Larry

I am uncertain whether I have been issued the SIS Independent Environmental Audit Report dated 30 June 2021.

Can you please provide me with a copy of the relevant document.

I will be responding on behalf of Western Sydney Parklands Trust.

Regards

Peter Marshall
Marshall Project Management
Tel: 9909 2418

P.T.O

From: Kevin Turner <Kevin.Turner@blacktown.nsw.gov.au>
Sent: Sunday, 10 October 2021 11:48 AM
To: Larry Weiss
Cc: Judith Portelli
Subject: RE: Consultation request - scope of Sydney International Speedway project (CSSI 10048) audit

Hi Larry,

I have reviewed the approval and have nothing further to add beyond ensuring compliance with general pollution as defined by the Protection of the Environment Operations Act

I should however make you aware that any complaints we get for the wider Eastern Creek area need to be considered against impacts to the community from the Bingo waste facility and their perceived lack of action from the EPA to ensure compliance with their Licence. Earlier in the year this was an extensive odour over many weeks

Regards,



Kevin Turner
Senior Coordinator Environmental Health

9839 6123

Kevin.Turner@blacktown.nsw.gov.au

PO Box 63 Blacktown NSW 2148

blacktown.nsw.gov.au

Follow us on social media



From: Larry Weiss <IEAuditor@bigpond.com>
Sent: Friday, 8 October 2021 12:04
To: Tony Merrilees <Tony.Merrilees@blacktown.nsw.gov.au>; Kevin Turner <Kevin.Turner@blacktown.nsw.gov.au>; Kelly Coyne <Kelly.Coyne@blacktown.nsw.gov.au>
Cc: Judith Portelli <Judith.Portelli@blacktown.nsw.gov.au>
Subject: RE: Consultation request - scope of Sydney International Speedway project (CSSI 10048) audit

Guys

Did you have any suggestions or information into the Speedway Audit Planning Approval Scope as requested below?

1

P.T.O

To: TURNA, TAJNIN
Cc: SHABILLA, HANKA; GANGULY, ARNAB; CAMPBELL, LISA
Subject: RE: AUDIT REQUEST - Consultation into scope of Sydney International Speedway project (CSSI 10048)

From: TURNA, TAJNIN <TAJNIN.TURNA@sydneywater.com.au>
Sent: Wednesday, 29 September 2021 11:58 AM
To: IEAuditor@bigpond.com
Cc: SHABILLA, HANKA <HANKA.SHABILLA@sydneywater.com.au>; GANGULY, ARNAB <ARNAB.GANGULY@sydneywater.com.au>; CAMPBELL, LISA <LISA.CAMPBELL@sydneywater.com.au>
Subject: RE: AUDIT REQUEST - Consultation into scope of Sydney International Speedway project (CSSI 10048)

Hi Larry,

Please find our comment below;

Sydney Water would want the contractor to demonstrate or provide evidence that they have complied with Sydney Waters standards and guidelines per Condition 49.

Thanks,

Tajnin Turna
Development Project Manager
Business Development
Sydney Water, Level 13, 1 Smith Street, Parramatta NSW 2150



Mobile: 0419 193 571
tajnin.turna@sydneywater.com.au

Annexure 3: Independent Audit Declaration

Independent Audit Report Declaration Form

Project Name: Sydney International Speedway

Consent Number: SSI 10048

Description of Project: Construction of the Sydney International Speedway

Project Address: Ferrers Road, Eastern Creek

Proponent: Sydney Metro

Title of Audit: Infrastructure Planning Approval compliance

Date: 6 December 2021

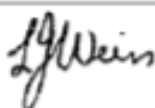
I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

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

Notes:

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

Name of Auditor: Larry John Weiss



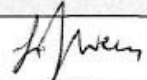

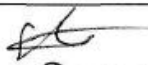
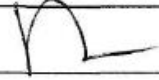


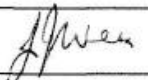


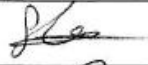
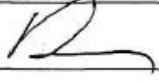
Signature:

Qualification: Bachelor of Science, Chemical Engineering

Company: QEM Consulting Pty Ltd

Company Address: 3 Erawar Close, Westleigh NSW 2120

Annexure 4: Audit Attendance Register

AUDITEE: Abergeldie AUDIT: Sydney International Speedway - Independent Environmental Audit REFERENCE: SSI-10048 (QEM 1803-026-SMW-IEA) SITE(s): Eastern Creek			Site inspections: 7 th & 15 th October 2021 Project audit onsite: as below	
NAME (print)	POSITION & ORGANIZATION		SIGNATURE	DATE
△ Larry Weiss	Independent Environment Auditor	QEM		7/10
Richard Fuller	Supervisor - ACPL	ACPL		7/10
Sarah Lepre	Project Officer - Enviro	Syd Metro		7/10
△ DMH	Superintendent	Dept		7/10
△ Kerie Pittaway	Enviro manager	Abergeldie		7/10
△ BRANDON JOHNSTON	Site Engineer	Abergeldie		7/10
AUDIT REVIEW / Video Conference:				
On-line attendees, as above indicated, as (△) plus:				
ARI KALAMOTAS	Interface Manager	Abergeldie	Virtual	11/10/2021
2nd SITE INSPECTION (COVID PROTOCOL)				
Larry Weiss	IEA	QEM		15/10/21
B. Johnston	Environmental Coordinator	ACPL		15/10/21
Kerie Pittaway	Env. Mgr	ACPL		15/10/21
Sarah Lepre	project officer - environment	Metro		15/10/21
DMH	Super	Dept		15/10/21