



Integrated
Management
System

Sydney International Speedway SSI 10048 - Sydney Metro response to Second Independent Audit

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Sydney Metro Integrated Management System (IMS)

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5.0 Sydney Metro Response to 2nd Independent Audit for Sydney International Speedway Project

In accordance with Section 4.3.2 of the Independent Audit Post Approval Requirements (May 2020), Sydney Metro submits this separate document as a response to the audit conducted by QEM Consulting Pty Ltd between 7 and 15 October 2021.

5.1 Non-compliances

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation	Response
			NON-COMPLIANCES WITHIN CURRENT AUDIT PERIOD:		
NC-10	A1	<p>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>	<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>	<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>	<p>Sydney Metro agree and are preparing to hold a lessons learnt workshop in early 2022, this will cover an assessment of the team's performance and an opportunity to review the management processes undertaken for the Contract. The workshop will also focus on the findings of this audit report and provide inputs into the Management Review Process required under ISO 14001:2015 which will be undertaken by April 30 2022.</p> <p>The lessons learnt exercise is expected to be completed by 15 March 2022, and the next 14001 Management Review will occur early 2022</p> <p>The workshop while focussing on the Speedway works will also explore Sydney Metro's approach to design management, change control and the relationship with the planning approvals. Notably the change control process currently in place has requirements in relation to planning and environmental compliance and the effectiveness of this will be reviewed.</p> <p>Furthermore, as per s5.25(2) of the EP&A Act, a modification to a Minister's approval is not required if the infrastructure as modified will be consistent</p>

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			<ul style="list-style-type: none"> • <i>Increased construction project footprint, increased native vegetation clearing and increased off-site spoil movements.</i> • <i>Significant change to 100% solar car park lighting and 1,000+ tree planting commitments</i> • <i>Carparks had been designed to be repurposed for additional but alternative uses (event staging)</i> • <i>Potential change to the 10pm operational curfew were being progressed.</i> 		<p>with the existing approval under Division 5.2 of the EP&A Act.</p> <p>Consistency Assessments are utilised by proponents such as Sydney Metro to demonstrate the planning approval does not need to be modified in accordance with Section 5.25 of the EP&A Act. The following Consistency Assessments were undertaken and endorsed for the SSI:</p> <ul style="list-style-type: none"> • SIS 01 Retaining Wall Drainage, approved 20/01/21 • SIS 02 Drainage Design Footprint, approved 25/02/21 • SIS 03 Spoil Reuse, approved 20/04/21 • SIS 04 Solar Array and Carpark Lighting, approved 30/06/21 • SIS 05 Two-way southern access road, approved 01/09/21 • SIS 06 Speedway Operating Hours, approved 25/10/21 • SIS ER01 Stormwater Road Crossing, endorsed 08/03/21. • SIS ER01 Additional Construction Area, endorsed 23/03/21 <p>As per Condition A1, the SSI must be carried out in accordance with the terms of this approval and generally in accordance with the:</p> <ol style="list-style-type: none"> a) Sydney International Speedway- Environmental Impact Statement Volume 1 & 2 (the EIS) (dated August 2020) b) Sydney International Speedway - Submissions Report (the Submissions Report, dated November 2020); and

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					<p>c) Sydney International Speedway-Amendment Report (the AR, dated November 2020).</p> <p>The inclusion of the word 'generally' is an intentional drafting by the Department to enable the proponent to undertake consistency assessments as ongoing design development and construction planning is undertaken.</p> <p>The Consistency Assessments undertaken for the SSI concluded that no conditions of the existing approval would need to be modified and no additional conditions of approval would be required. The Consistency Assessments undertaken for the SSI also concluded that the proposed works would be consistent with the existing approval and therefore modifications to the approval are not required. Therefore the SSI has been carried out generally in accordance with the relevant planning documents and where there have been slight changes these have been documented, assessed, mitigated (where relevant) and are deemed consistent with the approval.</p>
NC-04	B6 (e) & B6 (f)	<p>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>	<p>Issue observed to continue Sydney Metro response to IEA Finding / Recommendation have proven be ineffective, the non-compliance continuing and remaining, this time with reports including:</p> <ul style="list-style-type: none"> • The initial SIS Independent Environment Audit Report, was 13 weeks late, requiring prompting from external stakeholders • Quarterly Environmental Monitoring Reports took some 	Refer to NC-04 recommendation in the OPEN Non-compliances section further	<p>Sydney Metro acknowledge process improvements can be made to facilitate the timely upload of documentation to our website. Process improvements will include ensuring Professional Services Contracts include requirements to provide documentation in a format that is consistent with the Web Content Accessibility Guidelines as it is a NSW government policy that all public documentation meets this standard prior to upload. These changes will be made before 15 March 2022.</p> <p>Other process improvements will be identified in the Sydney Metro Speedway Project lessons learnt exercise which will be completed by 15 March 2022.</p>

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			weeks to upload post internal finalisation.		
NC-11	C7	<p>The CEMP and Sub-plans (Traffic Management Plan) including any amendments approved by the ER must be implemented for the duration of construction.</p>	<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 internal 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 – administrative and physical measures sighted 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. 	<p>Sydney Metro and Abergeldie will undertake the recommendations of the auditor, in particular:</p> <ol style="list-style-type: none"> 1. The CTMP required weekly inspections of long-term traffic controls. While this frequency was not maintained, inspections were conducted at least monthly and regular ER inspections did cover traffic management. Traffic inspections are to be formalised and recorded as a part of the traffic control measures as will inspections of the haulage routes to/from site. 2. The record of these inspections will be documented in the Abergeldie Management system and appropriate data will be included in the project monthly report for communication to the project management team by 30 Jan 2022. 3. Abergeldie will be using the findings of this independent audit to update traffic management practices by 15 January 2022. <p>The incident raised in this finding was managed through the formal incident reporting process prior to the production of the audit report. Regular inspections carried out by Abergeldie and the ER will continue to monitor the implementation of traffic management until the completion of construction effective immediately.</p>

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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.	<p>Of the 15 properties identified in the EIS, 2 properties accepted the offer and the treatment was completed by 13 Nov 2021.</p> <p>Sydney Metro considers that there is a relationship between conditions E31 and E30, whereby if submission of the report required under E31 is made, the requirements of E30 are satisfied. This report was provided to DPIE on 18/6/2021 justifying that additional time was required to carry out property treatments.</p> <p>Regardless, an examination of the process to undertake property treatment and the timeframe required under condition E30 will be addressed as part of the lessons learned exercise expected to be completed by 15 March 2022.</p>
NC-13	E42	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>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 	<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 	<p>The design has considered light spill, however a review of aspects such as output, angle, and shade will be carried out in respect to AS/NZS 4282:2019 and the National Light Pollution Guidelines for Wildlife. This review will be captured in an evaluation and review report expected to be completed by 31 January 2022.</p> <p>The site is not highly urbanised and the nearest residents are only likely to see stadium lighting</p>

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		<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>3000:2018 Electrical Installation (Wiring Rules) and Outdoor Car Parks Lighting Subcategories of AS 1158.3.1:2020</p> <ul style="list-style-type: none"> 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 	<p>approval compliance close-out, correlating the various lighting system designs and as built infrastructure with AS/NZS 4282 specifics</p> <p>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</p> <p>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.</p>	<p>which is shielded and angled downwards onto the track. Sydney Metro intends to carry out consultation with affected landowners upon the commencement of operations where landowners may potentially be affected by lighting.</p> <p>The lessons learnt workshop will include an evaluation review and report on evidence to demonstrate that lighting designs achieved required outcomes and performance in terms of minimising impacts in the context of environmentally sensitive areas.</p>

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			<p>best practice principles being a design input</p> <ul style="list-style-type: none"> 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. 		
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>	<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>	<p>With regards to the impervious surfaces, Sydney Metro investigated having some of the carparks (Carpark C – Dragway spectator, and Carpark B – Speedway competitor) as grasscrete or other pervious finish.</p> <p>This was not progressed due to:</p> <ul style="list-style-type: none"> Durability issues in Carpark B with heavy vehicle movements during transportation of race cars to/from Speedway. Reduction in the opportunities in Carpark C to use the Dragway carparks for additional purposes (e.g. defensive driver training, and car events). The existing adjacent Dragway grasscrete carpark experiences drainage issues following major rain events, impacting useability. With all Carpark areas consisting of clay soils drainage from permeable carparking areas were anticipated to encounter the same issue. Key

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			<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/ands Urban Design principles 		<p>stakeholders expressed concern that if installed this would increase pre-existing drainage issues.</p> <p>Regarding shade provision and visual impacts, Sydney Metro is coordinating with the landscaping designer and Abergeldie to plant a number of trees consistent with the commitments in the EIS by 30 April 2022.</p> <p>Lastly, Sydney Metro will undertake a project close-out workshop as part of a lessons learnt exercise.</p>
NC-15	LV1	Opportunities to minimise the area of vegetation clearance and for the retention and protection of existing street	No evidence was provided of any construction planning process or workshops to demonstrate vegetation	Recommendation as above.	Clearance of some vegetation was avoided during construction as noted in this finding. The reference to section 4.4.1 in this finding appears to relate to the overall project footprint and not the quantum of

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		trees and trees within the project site would be identified during detailed construction planning.	clearance options being considered, noting: <ul style="list-style-type: none"> Some stormwater design routing had been changed in reality to divert around protected areas (a positive) Section 4.4.1 of this report reflects more native vegetation clearing and that protected. 		vegetation clearance. The Sydney Metro Speedway Project EIS only indicated the footprint was about 21 hectares and some additional area was subject to assessment of consistency with the EIS through SIS ER01 Additional Construction Area, endorsed 23/03/21 as referenced in our response to NC-10. Sydney Metro will undertake a project close-out workshop to investigate this finding further as part of a lessons learnt exercise.
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.	No heat absorbing ground surfaces were provided in any of the car parking areas, neither were trees incorporated - refer also to E44 above and REMM LV2 (Appendix G). <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.	Opportunities to incorporate heat absorbing surfaces and permeable parking areas were discussed in consultation with key stakeholders. Incorporating landscape medians and islands would have reduced parking capacity, requiring a broader parking approach and wider impacts. Alternative solutions that impact parking capacity were not deemed operationally viable by key stakeholders. Sydney Metro will undertake a project close-out workshop to investigate this finding further as part of a lessons learnt exercise. This exercise will form an input into the Management Review process required under ISO 14001 (see response to NC10).
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.	No evidence was provided of any design development reviews or workshops to demonstrate vegetation clearance options being considered, noting: <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.	The design for the Speedway Project is considered to limit vegetation clearance in the project area as much as possible. Additional consideration to minimising vegetation clearance was given during further design of cross drainage and batter chutes for the Reinforced Soil Wall in SIS 02 Drainage Design Footprint, approved 25/02/21. Project boundaries were flagged during delivery to avoid unintended vegetation clearance and raise awareness of surrounding sensitive vegetation communities.

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					Sydney Metro will undertake a project close-out workshop to investigate this finding further as part of a lessons learnt exercise.