

CSSI 10051 - Sydney Metro response to Independent Audit 07 and Audit 03

SM-25-00060690

Applicable to:	Sydney Metro Western Sydney Airport
Status:	Final
Date of issue:	17 April 2024

SM – WSA CSSI 10051

Sydney Metro Response to Audit No.7 and Audit No.3 Findings

Item	Ref	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ²	Sydney Metro Response
10051_IA7_1 Wolfpeak	A2	Non-compliance (self-Reported)	<i>The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.</i>	On 11 and 31/10/24 oversize overmass vehicles used Harris Street and Forrester Road, St Marys, without Penrith Council approval (Council had requested additional swept path information on 14/10/24).	This was subsequently reported to the Department and the Department issued a warning letter on 19/12/24. Approval from Council was obtained after the fact and no further non-compliances relating to this issue have been identified by the auditees.	AEW FSM (LORAC)	CLOSED	N/A
IA3 – NC01 Morasey Environment	C10	Non-Compliance (self-Reported)	<i>Construction must not commence until the CEMP and all CEMP Sub plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.</i>	<p>There was one notification of Non Compliance (NC) submitted to DPHI for SSTOM during the audit period. The NC was raised against Condition C10 (& REMM LV2) and related to flora and fauna management at the SMF site.</p> <p>The NC Report states "To marginally extend the SMF car park area, the PLM construction team removed the 'tree protection zone (TPZ)' flagging and signage and stripped topsoil within the no-go zone without a permit to perform such works. Topsoil stripping was conducted with a 2-tonne excavator and encroached to within 4m of the tree. The shallow topsoil stripping went to a maximum depth of 50mm and did not expose or any tree roots".</p> <p>Photos taken during topsoil reinstatement works were attached to the NC report, and reinstatement of the area was inspected during the audit and appeared adequate.</p>	Nil	SSTOM (PLM)	CLOSED	N/A
IA3 – OBS 1 Morasey Environment	C10	Observation	<i>Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.</i>	IBCs of liquid waste, tins of hazardous chemicals and other miscellaneous materials were stored at the Bringelly Facility without adequate cover, labelling or secondary containment.	Review the area and ensure all storage of liquid wastes and chemicals is in accordance with AS1940:2017 The storage and handling of flammable and combustible liquids. Dispose of liquid wastes as per the Waste Management Sub-Plan.	SSTOM (PLM)	OPEN	PLM commit to compliant storage of liquid wastes and hazardous chemicals and the correct disposal of liquid wastes, as per the WMP
IA3 – OBS 2 Morasey Environment		Observation		During the site inspection a significant number of cigarette butts were observed littered around the site compound and surrounding areas, despite designated smoking areas nearby and sign-posted.	Re-communicate the requirement to utilise designated smoking areas, including bins provided for cigarette butts as per the Waste Management Sub-Plan	SSTOM (PLM)	OPEN	PLM commit to further reinforce this message and will continue to educate the teams on the impacts of littering across the project.
IA3 – NC02 Morasey Environment	C22	Non-Compliance	<i>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction</i>	A Groundwater CMR for SSTOM was not available for review at the time of this IA3, and	Nil – addressed by PLM by raising NC report	SSTOM (PLM)	CLOSED	N/A

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			<i>Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</i>	there was no evidence of submission to DPHI or other relevant regulatory agencies.				
10051_IA7_3 Wolfpeak	C23	Observation	<i>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</i>	<p>The 6 monthly Noise and Vibration Monitoring Report extends to December 24 and SBT works were completed in January 25 and no further monitoring reports are proposed to be prepared by SBT given the completion of works. According to SBT (CPBG), the ER considers this to be acceptable.</p> <p>The 6 monthly Surface Water Monitoring Report extends to October 24 and SBT works were completed in January 25 and no further monitoring reports are proposed to be prepared by SBT given the completion of works. According to SBT (CPBG), the ER considers this to be acceptable.</p> <p>The 6 monthly Groundwater Monitoring Report submission was delayed, with the agreement of DCCEEW, to 08/04/25. This is outside of the audit period.</p>	The 6 monthly Groundwater Monitoring Report was submitted on 04/08/25.	SBT (CPBG)	CLOSED	N/A
10051_IA7_4 Wolfpeak	E85	Observation	<i>Condition surveys of all items for which condition surveys were undertaken in accordance with Condition E84 must be undertaken by a suitably qualified and experienced person after completion of the work identified in Condition E84. The results of the surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of the work that could impact on the subject surface / subsurface structure.</i>	<p>The Auditor requested evidence to demonstrate that each property that received a preconstruction condition survey report has received a postconstruction survey, and that the post-construction survey report had been issued to the landowner no later than 3 months following the potentially impacting works.</p> <p>SBT stated by way of an email dated 11/04/25 that:</p> <ul style="list-style-type: none"> '212 pre condition surveys completed (including 14x second round pre surveys) 198 post condition surveys completed (including 4x second round post surveys) All properties accepting a pre condition survey were offered a post condition survey. Some property owners didn't respond, or declined a post condition survey.' <p>In addition a property survey tracker was provide (CPB_WSA_Property Log Sheet_live.xls). According to this tracker:</p> <ul style="list-style-type: none"> 198 x pre-construction condition surveys were completed, with 14 x properties receiving a second round pre-construction condition survey. 206 x post-construction condition surveys were offered. 69 x properties did not respond and 7 x properties declined. 	<p>It is recommended that SBT (CPBG) verify the contact details and method of contact for each of the 69 x properties that did not respond to post-construction condition surveys and remake the offer if any change to these details occurs. This will ensure that all properties eligible for the post-construction condition survey receive one (unless declined).</p>	SBT (CPBG)	OPEN	<p>CPBG has provided evidence consisting of a log with details regarding properties that received a pre and post construction surveys with details attached:</p> <p>212 pre-condition surveys completed (including 14x second round pre surveys)</p> <p>198 post condition surveys completed (including 4x second round post surveys)</p> <p>CPBG will investigate further as to the verification method utilised to contact properties requiring a post condition survey for which currently a 'no response' has been allocated, to ensure contact details were correct. A response will be provided to Sydney Metro by May 31 2025.</p>

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				<p>The Auditor observes the large number of properties that did not respond to the offer (~33%).</p> <p>It is unclear from the tracker why more properties were offered post-construction condition surveys to that which received pre-construction condition surveys.</p>				
10051_IA7_5 Wolfpeak	E105	Non-compliance (self-Reported)	<i>Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP.</i>	On 18-19/09/24 heavy vehicles used Forrester Road, St Marys, (to access a private road rather than to access Harris Street) prior to Planning Secretary approval which was issued late on 19/09/24.	The HVLR was subsequently approved on 19/09/24. This was reported to the Department and the Department issued a warning letter on 19/12/24. The Auditor is not aware of any other events involving heavy vehicles using unapproved local roads during the audit period.	AEW FSM (LORAC)	CLOSED	N/A
IA3 – OBS 3 Morasey Environment	E128	Observation	<i>Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).</i>	It was noted that the PESCP displayed at Bradfield Station did not reflect current site conditions in relation to swales. The correct PESCP was presented during the audit interviews on 7/2/2025 and PLM committed to displaying the correct PESCP on site.	<p>Review ESCPs displayed on site to ensure the current conditions are reflected and the correct version is displayed.</p> <p>It is noted that the current version of the ESCP was available on site, but the wrong version had been displayed.</p>	SSTOM (PLM)	OPEN	Environment team is reminded to check ECM and ESCP during their weekly inspections and ensure the most current plan is available to the site teams / visitors.

^[1] The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with A44/A45.

^[2] Status of finding and action according to the Auditor at the time of finalizing the Report.