



SSI 10038 and SSI 19238057- Sydney Metro response to Independent Audit 06

SM-25-00070150

Applicable to:	Sydney Metro West
Status:	Final
Date of issue:	08 May 2025

CSSI 10038 – Findings from the Independent Audit (February 2025)

Item	Relevant phase	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By whom	Status ²	Proponent Response
10038_Feb25_1	Phase B (CTP)	C23	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 Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</i>	The CTP Groundwater Monitoring Program requires each 6-monthly Monitoring Report to be provided to the relevant authorities (including SOPA, EPA (if requested) DPIE Water and NRAR) within 40 business days of the monitoring period ending. The CTP Bi-Annual Construction Monitoring Report 6 (July – December 24) was provided to The Water Group and NRAR on 17/03/25 and 14/03/25 respectively, which is beyond 40 business days of the monitoring period ending (31/12/24). There was no evidence available to demonstrate it had been provided to SOPA.	Provision of the Monitoring Report to the Water Group and NRAR was completed after the due date. CTP provided the Monitoring Report to SOPA on 02/04/25, after the due date.	AFJV	Closed	AFJV has raised NCR043 against this finding and provided the BACMR to the relevant stakeholders to close it out. Sydney Metro submitted this to DPHI in accordance with MCoA A45 and A46 on 6 May 2025.

¹ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance within 7 days of becoming aware of them in accordance with A45/A46.

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

Item	Relevant phase	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By whom	Status ²	Proponent Response
10038_Feb25_2	Phase F (WTP)	D86	Non-compliance	<i>Local roads proposed to be used by Heavy Vehicles to directly access construction sites that are not identified in the documents listed in Condition A1 of this schedule must be approved by the Planning Secretary and be included in the CTMPs.</i>	According to emails between GLC and Sydney Metro, dated 01/11/24 and 05/11/24, regarding repairs to Hassall Street Westmead, there is evidence shared between the two parties that heavy vehicles are not following the approved routes based on GLC's HVLR for Westmead.	<p>WTP provided the approved haul routes to the responsible heavy vehicle company (Holcim) prior to and after the event. WTP also requested Holcim deliver a toolbox to reiterate the approved haulage route in anticipation for the next Holcim order planned for the 08/11/24.</p> <p>The Auditor is not aware of any other events having occurred during the audit period and on this basis considers the finding closed.</p>	GLC	Closed	<p>GLC implement a multi-layered approach to ensure trucks adhere to the approved haulage route. This includes:</p> <ul style="list-style-type: none"> - Project inductions – to make all workers aware of the approved haulage route. - Driver onboarding sessions and training - including approved haulage routes (the HVLR and CTMP) - Online driver booking system that provide the approved haulage routes - Email correspondences to delivery partners detailing the approved haulage routes - Toolboxes and training – where delivery partners do not adhere to the approved routes. - Contractual action where there are repeat issues with the same driver and or the company. <p>In the context of the event that occurred on the 30th October 2024, GLC implemented the following measures prior to, and following the event:</p> <ol style="list-style-type: none"> 1) GLC provided Holcim with the approved haulage route to the driver prior, via the online booking system Datascope. Evidence provided included: screenshots from Datascope demonstrating Holcim are registered on the platform and are provided the approved haulage route. 2) Following the event on 30th October 2024 – GLC requested Holcim deliver a toolbox to reiterate the approved haulage route in anticipation for the next Holcim order planned for the 8th of November 2024. <p>Sydney Metro submitted this to DPHI in accordance with MCoA A45 and A46 on 8 May 2025.</p>

10038_Feb25_3	Phase F (WTP)	D89	Observation	<p><i>If damage to roads occurs as a result of the construction of Stage 1 of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the Road Dilapidation Report.</i></p>	<p>On 10/02/25 Cumberland City Council (CCC) requested that audit focus on restoration of roads (among other items) and noted that ‘the contractor has not maintained the local roads to a satisfactory level on a proactive basis. Council has advised Metro West on several occasions after receiving complaints from residents and Council staff noticing significant damage to local roads due to construction vehicles.’</p> <p>The Auditor notes that there is no interface agreement between GLC and CCC, and engagement between the two is managed by Sydney Metro. According to notifications by GLC via the CCC portal and emails between GLC, Sydney Metro and CCC, there appears to be debate as to the extent of damage caused by WTP on Hassall Street. According to GLC the road condition around Westmead were in a poor condition prior to construction (as identified in the pre-construction conditions surveys) and have been notified by GLC to CCC on a proactive basis through the CCC community engagement portal.</p> <p>After investigations and discussion on responsibility between the parties, GLC undertook repairs on 23/11/24 on the portion of Hassall Street that is subject to construction vehicle movements (areas outside of the approved haul routes were not repaired). These repairs were limited to fixing potholes and the like. A re-sheet was not conducted by GLC on the basis that construction is ongoing. Repairs are completed by GLC contractors of which the auditees are of the view are suitably experienced to conduct such work. The repairs were communicated back to CCC in November 2024 via email and (according to the evidence provided) CCC did not raise concerns with (or state acceptance of) the repairs at that time.</p> <p>As noted at the top, CCC since advised the Auditor as part of consultation on the scope of this audit that they were not entirely satisfied with the road maintenance.</p>	<p>It is recommended that a more formal process be established between the parties to manage road surveillance, maintenance and repairs so that more certainty can be provided on damage to the road as a result of Project works, and the desired restoration works.</p>	Sydney Metro and GLC	Open	<p>Sydney Metro acknowledges that road restoration is an ongoing concern for Cumberland City Council (CCC), given there have been many overlapping project works in the area.</p> <p>Currently, there are processes in place around the scope and timing of road restoration. These processes are outlined in the Letter of Agreement between Council and Sydney Metro dated 31 March 2021 and in addition, in a Transport for NSW Western Tunnelling Package Roads Interface Agreement (WTP RIA). The Letter of Agreement (Clause 7) sets out the process by which CCC staff can escalate issues or concerns.</p> <p>Sydney Metro proposes to arrange a face to face meeting with CCC staff to provide an overview regarding Metro contractor timelines and processes in place with Council for road restoration, as outlined in the abovementioned documents. This would be an opportunity for staff to gain more information and ask questions.</p> <p>Sydney Metro convenes a monthly meeting with CCC engineering staff and its contractor to review upcoming permit applications and to discuss council and GLC/Sydney Metro works happening in the area. These meetings help foster collaboration between all parties and promote information sharing, particularly with regard to work underway locally.</p> <p>In addition to the above, Sydney Metro also undertakes pre- and post-construction road dilapidation surveys. Prior to the commencement of Sydney Metro works at Westmead, pre-construction dilapidation road surveys were completed for the aforementioned Transport for NSW WTP RIA. Once tunnelling works are complete, the contractor will undertake a post-construction dilapidation survey for these roads. This is a requirement of their completion process and under the Agreement, TfNSW can then request that repairs be undertaken if the post-survey notes any significant road damage.</p>
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CSSI 19238057 - Findings from the Independent Audit (February 2025)

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
19238057_Feb25_1	A20	Observation	<p><i>Ancillary facilities that are not identified by description and location in the documents listed in Condition A1 can only be established and used in each case if:</i></p> <p>a) <i>they are located within or immediately adjacent to the Construction Boundary; and</i></p> <p>b) <i>they are not located next to sensitive land user(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location unless otherwise approved by the Planning Secretary; and</i></p> <p>c) <i>they have no impacts on Heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the conditions of this approval; and</i></p> <p>d) <i>the establishment and use of the facility can be carried out and managed within the outcomes set out in the conditions of this approval, including in relation to environmental, social and economic impacts.</i></p> <p><i>Note: This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under Condition A23.</i></p>	<p>During the audit inspection at Hunter Street West, dirty water from the truck washdown was observed to have travelled onto the adjacent roadway. The JCG team responded immediately and a coir log was placed downstream and subsequent trucks were washed down within the site. Notwithstanding this a very small amount of construction water appeared to have entered the adjacent live stormwater drain.</p>	<p>According to JCG 'Work on the construction of the alternative egress point is still ongoing with completion expected in the week commencing 16/3/25. Works have been undertaken to further stabilize and improve the current temporary egress point including sheeting the lower ramp with ballast, installing a concrete apron down slope of the rumble grid, cleaning sediment from the rumble grid and constructing a temporary sump and sump pump next to the site exit.'</p> <p>Photos were provided to support this statement. The Auditor considers this closed for the purposes of the audit, given JCG's response, the dynamic/transient nature of sediment control and truck movements and that this matter would be subject to surveillance by JCG, Sydney Metro and the ER.</p>	JCG	Closed	Regular inspections of sediment controls continue to occur to monitor gate access points across the project. Actions to manage sediment are implemented to prevent adverse impacts occurring.
19238057_Feb25_2	Not used							
19238057_Feb25_3	C23	Non-compliance	<p>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER, AA (where relevant) 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>As noted in Table 16 above, the Biannual Water Monitoring Report for April to Sep 24 was not submitted to the Department within the required timeframe. This was reported to the Department on 12/12/24 in accordance with A46/A47.</p> <p>In addition, during the audit it was found that there was no evidence to demonstrate that the Monitoring Report had been submitted to the Water Group or NRAR as per the Monitoring Program.</p>	<p>The Biannual Water Monitoring Report for April to Sep 24 was subsequently reported to DPE Water Group and NRAR on 13/03/25 and the non-compliance was reported to the Department on 14/03/25.</p>	Sydney Metro	Closed	

³ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance within 7 days of becoming aware of them in accordance with A46/A47.

⁴ Status of finding and action according to the Auditor at the time of finalizing the Report.

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
19238057_Feb25_4	D37	Non-compliance	<p><i>Out-of-Hours Works – Community Consultation and Respite</i></p> <p><i>In order to undertake out-of-hours work outside the work hours specified under Condition D21 of this schedule, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with:</i></p> <p><i>a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work;</i></p> <p><i>b) a description of the potential work, location and duration of the out-of-hours work;</i></p> <p><i>c) the noise characteristics and likely noise levels of the work; and</i></p> <p><i>d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition D26 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).</i></p> <p><i>The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER and AA, before the out of hours work commences, and to the EPA and the Planning Secretary on request.</i></p>	<p>The D37 Outcomes of Community Consultation Report – October to December 2024 (Q4), has not been provided to the ER and AA as at 27/02/25. Therefore the outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work have not been provided to the ER and AA, prior to the OOHW commencing.</p>	<p>Submit the D37 Outcomes of Community Consultation Report – October to December 2024 (Q4) to the ER and AA at next opportunity.</p> <p>Establish a process whereby submission to the ER and AA occurs prior to the triggering works commencing.</p>	Sydney Metro and JCG	Closed	<p>Sydney Metro issued Outcomes of Community Consultation Report to the ER & AA 03/03/2025 (following works commencing). Sydney Metro will look to submit notification to the ER and AA prior in the future.</p> <p>In accordance with MCoA A46, DPHI was notified of this non-compliance on 07/05/2025.</p>
19238057_Feb25_5	D77	Non-compliance	<p><i>All vehicles associated with the CSSI (including light vehicles and Heavy Vehicles) must be managed to:</i></p> <p><i>a) minimise parking on public roads;</i></p> <p><i>b) minimise idling and queueing on state and regional roads;</i></p> <p><i>c) not carry out marshalling of construction vehicles near sensitive land user(s);</i></p> <p><i>d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and</i></p> <p><i>e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMPs</i></p>	<p>JCG have a system to manage heavy vehicles on the Project, however the system failed to ensure spoil haulage vehicles adhered to the nominated haulage routes identified in the CTMPs on 52 x occasions during the audit period.</p> <p>JCG provided a range of information regarding this requirement and the following is of note:</p> <ul style="list-style-type: none"> JCG has an advanced and robust system for managing heavy vehicles, and is of the view that it is implementing all reasonable and feasible control measures to ensure adherence is achieved (including training, real-time monitoring, weekly analysis of route breaches, disciplinary action in accordance with the Driver Code of Conduct, and reporting via the CPAS Monitoring Report). Evidence was provided supporting this and the Auditor does not dispute this position. 	<p>As noted, JCG have implemented a range of controls to seek to prevent off-route events occurring. These should continue.</p> <p>The off-route events have been reported in Table 5 of the CPAS Monitoring Report, and this information is provided to the Department. The Auditor is not aware of the Department raising issues with the reported off-route events.</p>	Sydney Metro and JCG	Closed	<p>JCG have implemented all reasonable and feasible measures to ensure spoil haulage vehicles comply with the nominated haulage routes identified in the CTMPs. These measures have been effective as 99.8% of spoil haulage vehicles have adhered to the nominated route.</p> <p>As noted by the auditor, no complaints or incidents have occurred as a result of the nominated route not being used.</p> <p>JCG will continue to monitor and report in the CPAS 6 monthly report any instances where the nominated haulage route is not followed.</p>

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
				<ul style="list-style-type: none"> The 52 x off-route events represents 0.16% of total movements for the 6 month period (31,770 trips recorded in total) One transport company (Lantrak) accounts for 71% of the 52 x off-route events. JCG have issued training and warnings to its drivers. After the audit interviews, JCG also issued Lantrak with another warning, noting that their performance needs to improve or drivers will be stood down further or removed from the Project. The remaining 29% of off-route events are attributable to Grid Logistics and State Road Constructions, and warnings were also issued to the relevant drivers. None of the off-route events resulted in heavy vehicles travelling past sensitive areas such as schools. There were no complaints regarding off-route heavy vehicle movements recorded in the complaints register, nor were there any associated incidents recorded by the Project team. 				In accordance with MCoA A46, DPPI was notified of this non-compliance on 07/05/2025.