



28 March 2025

Attn [REDACTED]

[REDACTED]
NSW Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear [REDACTED]

**Sydney Metro CSSI 8256 – Sydney Metro Sydenham to Bankstown Upgrade –
Independent Audit Report**

Please find attached the Independent Audit Report for Sydney Metro Sydenham to Bankstown Upgrade – Final Conversion Works (SWM3). This report is issued to the Secretary for information in accordance with CSSI 8256 Condition of Approval A35. The audit inspection took place on 14 February 2025.

Accompanying this letter are the following documents:

- Independent Audit – Southwest Metro Conversion and Station Works Package 3 – March 2025, report dated 27 March 2025.

Should you have any questions or comments on the attached, please do not hesitate to contact [REDACTED] or [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]
[REDACTED]
Technical Services
Sydney Metro

Sydney Metro

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INDEPENDENT AUDIT – SOUTHWEST METRO CONVERSION AND STATION WORKS PACKAGE 3

SYDNEY METRO SOUTHWEST – SSI 8256

MARCH 2025

Authorisation

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Report Name: Independent Audit, Southwest Metro Conversion And Station Works Package 3 – SSI 8256

Project No.: 1142

Prepared for:

Sydney Metro
Level 43, 680 George Street
Sydney, NSW, 2000

Prepared by:

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EXECUTIVE SUMMARY

Sydney Metro is responsible for delivery of the Sydney Metro Southwest Project, which involves the conversion of the T3 Bankstown Line (between Sydenham and Bankstown (or S2B)) to metro standards.

The Project is classified as Critical State Significant Infrastructure (CSSI) under Division 5.2 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) and State Environmental Planning Policy (State and Regional Development) 2011. Approval for this Project (CSSI_8256) was granted on 12 December 2018.

This Independent Audit relates to the Southwest Metro Conversion and Station Works Package 3. The Package is an extension to earlier packages that have been working along the T3 Bankstown Line. Sydney Metro has appointed the John Holland Laing O'Rourke Joint Venture (JHLOR) as the Principal Contractor delivering the work.

This audit was carried out in accordance with the independent audit requirements outlined in the conditions A34 and A35 of CSSI 8256 and in Section 4.4.3.2 of Sydney Metro's Compliance Monitoring Tracking and Reporting Program.¹ The scope of the audit was developed in consultation with Sydney Metro and the Project's Environmental Representative (ER). The scope is summarised in Table E1.

Table E1: Audit scope

Work Package	Auditee	Audit period	Main Scope	Sites to be inspected
Southwest Metro Conversion and Station Works Package 3	John Holland Laing O'Rourke Joint Venture (JHLOR) Sydney Metro	14 September 2024 – 14 February 2025	Noise and vibration Conditions E19 – E30 CNVMP Sections 7.1 – 7.5, 7.11 – 7.12, 8.2, 8.4	Bankstown Station

The objective of the audit (for the identified audit scope) is to:

- assess the environmental performance of the CSSI, and its effects on the surrounding environment (refer Sections 3.2, 3.4 and 3.6)
- assess whether the Project is complying with the terms of this approval (refer Section 3.2 and Appendix A)
- review the adequacy of any document required under this approval (refer Section 3.3)

¹ The initial Independent Audit Program was prepared prior to the commencement of construction, within Section 4.4.3.2 of Sydney Metro's CMTRP. The CMTRP has undergone several updates since commencement of construction with the current version most recently having been approved in 2022.

- recommend measures or actions to improve the environmental performance of the CSSI, and improvements to any document required under the approval (refer Sections 3.2 and 3.6).

The overall outcome of the audit was positive. Records were well organised and available at the time of the site inspection and interviews with Project personnel from Sydney Metro and JHLOR. In summary:

- Five (5) non-compliances were identified and self-reported by the auditees during the audit period. These relate to the lack of protection of vegetation and unapproved Out of Hours Works (OOHW).
- Fourteen (14) conditions were assessed as part of the audit.²
 - No non-compliances were identified beyond those identified and self-reported by Sydney Metro.
 - Two (2) opportunities for improvement were identified in relation to reviewing and updating the CNVMP to clarify how certain commitments will be implemented and to review and update the land use survey to ensure all receivers are correctly categorised.
 - One (1) observation was raised regarding the ER identifying minor deficiencies in noise management practices on site.

The Auditor considers the management plans to be adequate for the works being conducted, with the environmental performance of the Project during the audit period to be sound and the potential effects on the surrounding environment to be well managed.

The Auditor draws attention to the requirements relating to ensuring respite is achieved across multiple contractors (i.e.: JHLOR, interface contractors and third parties), as well as the need for JHLOR to undertake cumulative noise and vibration assessments of both their works, and the works of others. Evidence was provided to demonstrate that these requirements were met during the audit period, but the Auditor notes:

- that a risk of non-compliance (with E26 and C7 [CNVMP, section 7.11], for example) exists given JHLOR are relying on information from third parties on plant type, location, use and scheduling (over which they have little or no control); and due to the process not being automated
- the Auditor is not recommending a change to the process adopted given this late stage of the Sydney Metro Southwest Project and the relative maturity of the process, but
- to ensure the performance on the Project continues, it is recommended that JHLOR and Sydney Metro continue to focus on coordination of interfacing contractors and third parties for OOHW. The Auditor is of the view that this cannot be left to JHLOR alone and is a joint effort by the senior staff of all parties working on the south-west corridor.

The Auditor would like to thank the auditees representing Sydney Metro and JHLOR for their high level of organisation, cooperation, openness and assistance during the Independent Audit.

² For the assessment of condition C7 (implementation of the CNVMP), the Auditor reviewed implementation of select mitigation measures and commitments from Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.11, 7.12, 8.2, 8.4 of the CNVMP. The evidence / findings have been incorporated into condition C7 within Appendix A.

1. INTRODUCTION

1.1 Project overview

Sydney Metro is responsible for delivery of the Sydney Metro Southwest Project, which involves the conversion of the T3 Bankstown Line (between Sydenham and Bankstown (or S2B)) to metro standards.

The Project is classified as Critical State Significant Infrastructure (CSSI) under Division 5.2 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) and State Environmental Planning Policy (State and Regional Development) 2011. Approval for this Project (CSSI_8256) was granted on 12 December 2018.

Southwest Metro Conversion and Station Works Package 3 is an extension to earlier packages that have been working along the T3 Bankstown Line and comprise:

- Bankstown Station and Precinct Works: New, and modification to existing, infrastructure and systems to facilitate a new cross-corridor plaza between The Appian Way (north of the rail corridor) and Restwell Street (south of rail corridor) retail facilities and Station Precinct and Public Domain improvements.
- Southwest Station Work:
 - Remaining South West Metro Corridor Work, being Segregation Fencing between Marrickville and Dulwich Hill; Hurlstone Park and Canterbury; Canterbury and Campsie; Campsie to Belmore
 - Remaining South West Metro Corridor Work Package 2, being Guard Rail installation various locations along corridor; Overhead Wire installation various locations along corridor; Station Security Fencing; Segregation Fencing; Mechanical Gap Filler/Platform Screen Doors at all stations excluding Sydenham and Bankstown; Signalling at Sydenham and Bankstown
- Southwest Corridor Works: Corridor access stairs; Screens fixed to CSR on bridges; Vegetation management; Acoustic treatment; Boundary fencing; Track monitoring; Cable hauling, signalling and comms equipment, radio mast and repeater install
- Asset Upgrades: Infringement and track rectification; Bridge upgrades renewals; Civil asset upgrade renewal
- Final Conversions: Sydenham junction final track configuration, fencing, wayfinding & signage (all stations), building management and control systems (BMCS), cable containment systems, cabinet installation and cables, testing and commissioning, low voltage power supplies, distribution systems and energisation, and lift conversions (Marrickville Station to Punchbowl Station); Earthing bonding, alteration works, insulated rail joints, redundant asset works; Clean up work (final rail grind, final rail tamp, station refresh/deep clean); Station meal room alterations at 9 stations (excluding Bankstown); Fixed gap filler works; Commissioning trials.
- ARTC Works: Temporary and permanent adjustments to ARTC operated and maintained infrastructure
- Utility works: Qenos Pipe removal; Non Sydney Trains (ST) or Sydney Metro (SM) assets (typically non-contestable works)

- Local area works: modification, reinstatement of public space, roads and pedestrian way, required for, or as a consequence of the SWM3 Contractor's Activities
- Property works: The Property Works comprises permanent adjustments to existing private properties required for, or as a consequence of the SWM3 Works and Temporary Works
- Temporary works to support the above.

A high level overview of the Project alignment is presented in Figure 1.

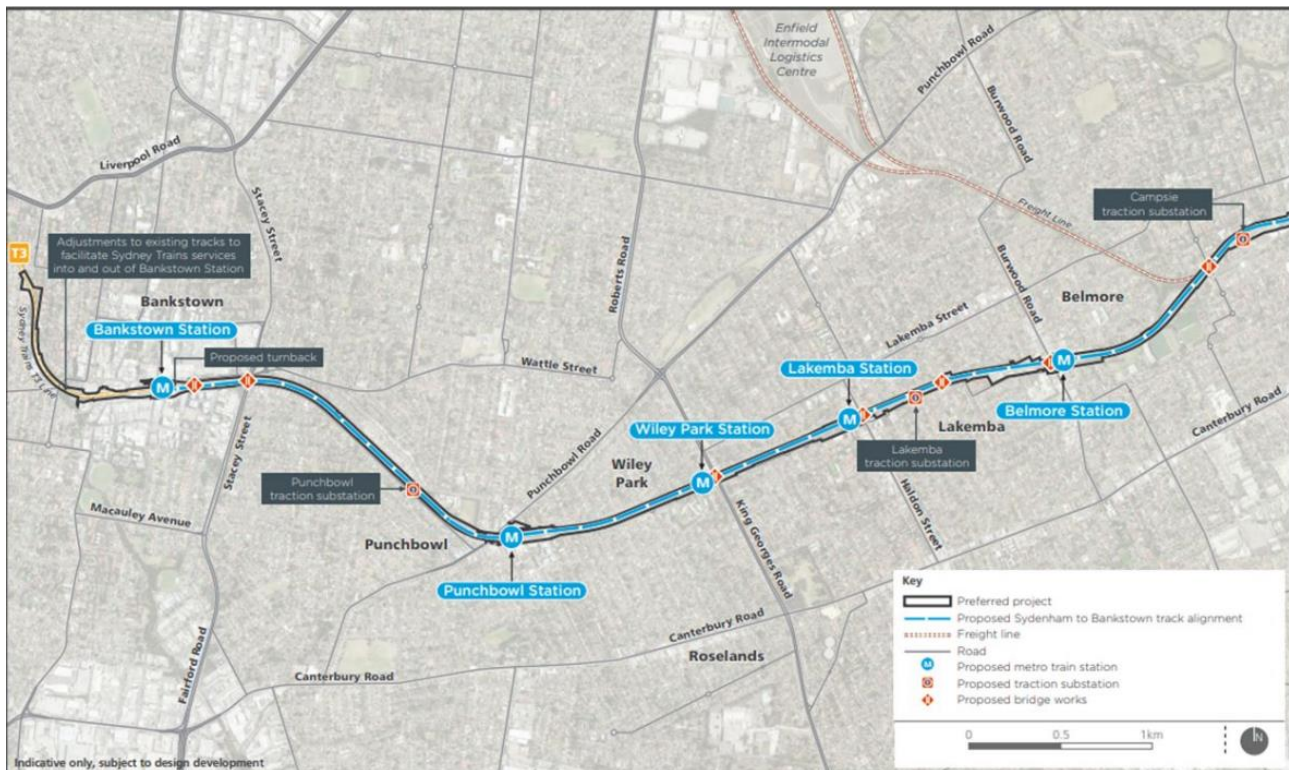


Figure 1: Sydenham to Bankstown Project alignment (source: (source: Sydney Metro City & Southwest - Sydenham to Bankstown - Submissions and Preferred Infrastructure Report, 2018)

The John Holland Laing O'Rourke Joint Venture (JHLOR) has been engaged by Sydney Metro as the Principal Contractor delivering the Southwest Metro Conversion and Station Works Package 3, continuing on from earlier stages of the Project.

1.2 Approval requirements

Conditions A33 – A35 of Schedule 2 of CSSI 8256 set out the requirements for undertaking Independent Audits. They state:

A33: No later than one (1) month before the commencement of Construction an Independent Audit Program prepared in accordance with the AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems must be submitted to the Planning Secretary.

A34: Independent audits of the CSSI must be carried out in accordance with:

- a) the Independent Audit Program submitted to the Planning Secretary under Condition A33 of this approval and Independent Audit Reports prepared.

A35 The Proponent must:

- a) review and respond to each Independent Audit Report prepared under Condition A34 of this approval; and
- b) submit the response to the Planning Secretary within six (6) weeks of completing the audit.

The initial Independent Audit Program was prepared prior to the commencement of construction, within Section 4.4.3.2 of Sydney Metro's Compliance Monitoring/Tracking and Reporting Program Report (CMTRP). The CMTRP has undergone several updates since commencement of construction with the current version most recently having been approved in 2022.

This audit was carried out in accordance with the independent audit requirements outlined in the conditions A34 and A35 of CSSI 8256 and in Section 4.4.3.2 of the CMTRP.

1.3 The auditor

The Independent Auditor who performed the auditing works is presented in Table 1.

Table 1: Auditor

Name	Company	Participation during this audit	Certification
██████████	WolfPeak	██████████	Bachelor of Environmental Management, Macquarie University Master of Environmental Engineering Management, UTS Exemplar Global Certified Lead Environmental Auditor (No. 114283)

A Declaration of Independence in accordance with the Department's *Independent Audit Post Approval Requirements (IAPAR, 2020)*³ (Appendix C).

1.4 The audit objective

In accordance with Section 4.4.3.2 of the CMTRP, the objective of this Independent Audit (for the identified audit scope) is to:

- assess the environmental performance of the CSSI, and its effects on the surrounding environment (refer Sections 3.2, 3.4 and 3.6)
- assess whether the Project is complying with the terms of this approval (refer Section 3.2 and Appendix A)
- review the adequacy of any document required under this approval (refer Section 3.3)

³ The IAPAR requirements are not applicable to this project, however we have used the declaration of independence form contained in these guidelines as the basis for declaring our independence from the Project.

- recommend measures or actions to improve the environmental performance of the CSSI, and improvements to any document required under the approval (refer Sections 3.2 and 3.6).

1.5 Audit scope

The scope of the Independent Audit was determined in consultation with Sydney Metro and the Project Environmental Representative (ER) and is set out in Table 2 below.

Table 2: Audit scope

Work Package	Auditee	Audit period	Main Scope	Sites to be inspected
Southwest Metro Conversion and Station Works Package 3	John Holland Laing O'Rourke Joint Venture (JHLOR) Sydney Metro	14 September 2024 – 14 February 2025	Noise and vibration Conditions E19 – E30 CNVMP Sections 7.1 – 7.5, 7.11 – 7.12, 8.2, 8.4	Bankstown Station

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – *Guidelines for Auditing Management Systems*.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists, comprising Approval conditions relating to noise and vibration and implementation of the Construction Noise and Vibration Management Sub-plan (CNVMP) and selected commitments from Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.11, 7.12, 8.2, 8.4 of the CNVMP) and distributed these to the Project team in preparation for the Independent Audit.

2.2.3 Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting, held on site on 14 February 2025, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

At the closing meetings, held online on 13 March 2025, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, timing for finalisation of the audit report and any post-audit actions were confirmed.

2.2.4 Site Inspection

The site inspection was carried out at the Bankstown Station on 14 February 2025. The names of personnel who attended the on-site component of the audit are provided in Table 3.

Table 3: Personnel Attending Site Inspections

Name	Role	Organisation	Involvement
██████	██████████████████	Sydney Metro	Site inspection, opening and closing meetings, interviews, document reviews.
██████████	██████████████████	Sydney Metro	Site inspection, opening and closing meetings, interviews, document reviews.
██████████	██████████████████	JHLOR	Site inspection, opening and closing meetings, interviews, document reviews.
██████	██████████████████	JHLOR	Site inspection, opening and closing meetings, interviews, document reviews.
██████████	██████████████████	JHLOR	Site inspection.
██████████	██████████████████	JHLOR	Interviews, document reviews.

2.2.5 Interviews

The Auditor conducted audit interviews and document review with key personnel on site (identified in Table 2 above) to review the audit evidence. The attendees included those personnel with responsibility for environmental management and were able to assist with verifying the compliance status and performance of the development. All other communication was conducted remotely, which included detailed requests for information and auditee responses to the request.

2.2.6 Consultation

The scope of this audit included consultation with Sydney Metro and the ER for the Project. The consultation determined that the focus of the audit should be on noise and vibration requirements and works around Bankstown Station. Further, the ER recommended that consideration be given to interface contractors' scope of works and how it is assessed within JHLOR's noise and vibration assessments.

2.2.7 Document review

The Independent Audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are detailed within Appendix A.

2.2.8 Generating audit findings

Independent Audit findings were based on verifiable evidence. The evidence included:

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans; and
- Site inspections of relevant locations, activities and processes.

2.2.9 Compliance evaluation

Whilst not mandated by the Project Approval or the CMTRP, the Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the Department's *Independent Audit Post Approval Requirements 2020 (IAPAR)*, as listed in Table 4, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Where findings were made against the requirements of a management plan, system or strategy we have used the term non-compliant where the requirement was not found to be fully implemented.

Observations and Opportunities for Improvement are also identified to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.10 Evaluation of post audit approval documentation

The Auditor assessed whether post approval documents have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document; or
- Whether there are any opportunities for improvement.

2.2.11 Completing the audit

The Independent Audit Report was distributed to the Proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The primary documentation reviewed prior to and after the site visits and interviews are listed below. This list is not exhaustive. The full set of documents and evidence sighted against each requirement is detailed within Appendix A:

- Conditions from CSSI 8256 applicable to the agreed audit scope (in Appendix A of this Report), being conditions C7, E18 – E30
- *Sydenham to Bankstown – Southwest Metro Conversion and Station Works Package 3 Construction Environmental Management Plan*, Revision 06, JHLOR, 14 November 2024 (the CEMP)
- *Southwest Metro – Southwest Metro Conversion and Station Works Package 3 Noise and Vibration Management Plan*, Revision 03, JHLOR, 12 September 2024 (the CNVMP)
- *Sydenham to Bankstown – Southwest Metro Conversion and Station Works Package 3 Heritage Management Plan*, Revision 03, JHLOR, 20 August 2024 (the CHMP) (confined to noise and vibration elements only)
- *Sydney Metro City & Southwest Out of Hours Work Strategy / Protocol*, Revision 5.3, Sydney Metro, October 2022
- *Sydney Metro City & Southwest complaints register 2024*
- *OOHW Worksite Coordination register (WCR)* for 04/11/24 – 14/02/25 (and OOHW permits issued November 2024 – February 2025)
- *EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3*, JHLOR, 30 September 2024 – 27 January 2025

3.2 Non-compliance, Observations and Actions

This Section presents findings from this audit.

The non-compliances that were identified and reported by the auditees during the audit period are presented in Table 5. Five (5) non-compliances were identified, relating to protection of vegetation and unapproved OOHW.

The non-compliances and observations (along with associated recommended or completed actions) are presented in Table 6. Detailed findings against each requirement are presented in Appendix A. In summary:

- Fourteen (14) conditions were assessed.⁴

⁴ For the assessment of condition C7 (implementation of the CNVMP), the Auditor reviewed implementation of select mitigation measures and commitments from Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.11, 7.12, 8.2, 8.4 of the CNVMP. The evidence / findings have been incorporated into Appendix A.

- No non-compliances were identified beyond those identified and self-reported by Sydney Metro.
- Two (2) opportunities for improvement were identified in relation to reviewing and updating the CNVMP to clarify how certain commitments will be implemented and to review and update the land use survey to ensure all receivers are correctly categorised.
- One (1) observation was raised regarding the ER identifying minor deficiencies in noise management practices on site.

Table 5: Non-compliances that were identified and reported by the auditees

Sydney Metro NCR number	Contractor responsible	Condition	Aspect	Requirement	Non-compliance
EVT-0002008	JHLOR	C7	Biodiversity (out of scope)	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	Potential encroachment of southern extent of PCT 1281 at Dudley St on 01/10/24. Works to install piling for fence footings in this area included cutting ground level down by approximately 300mm and into the PCT up to 700mm. Provided an additional 700mm beyond the security fence alignment was required for constructability purposes, prior to works commencing an ecologist should have re-assessed the area to comply with REMM B1. Note: None of the vegetation recorded in the study area meets the criteria for any TECs listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (GHD., 2017) or Biodiversity Conservation Act 2016. The Dudley St PCT area consists of a number of native grasses, namely Themeda triandra (Kangaroo Grass), with Rytidosperma tenuius (Wallaby Grass) and Dichelachne micrantha (Shorthair Plumegrass). The area is interspersed with weedy exotic shrubs, grasses, and herbs. Works were stopped, area was temporarily stabilised. An ecologist was required to re-assess the area to determine the level of impact. Once this is established a permanent solution for the area will be determined..
EVT-0002014	JHLOR	C7	Noise and vibration (in scope)	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	Unapproved OOHW occurred at Dulwich Hill Station on 01/10/24 when preparing the station for shutdown by installing a few water barriers and ATF fencing Works were not notified and appropriate mitigations were not offered. This was in contravention of CEMP Table 11 hold point: Out of Hours Work (OOHW) Approval.
EVT-0002030	UGL/Hyundai	C7	Noise and vibration (in scope)	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	An unapproved OOHW occurred at Dulwich Hill Station on 19/11/24. A float was arranged and the driver attended site earlier than the allowable time of 7:00AM (4:40am). The OOHW were not notified, and appropriate mitigations were not offered to affected residents.
EVT-0002034	JHLOR	C23	Noise and vibration (in scope)	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	Unapproved tool (jack hammer) used in day OOH at Marrickville Sewer for pile trimming on 24/11/24. Jack hammering was not included in the noise model, as such was not permitted to be used. Appropriate mitigation and notification was not issued. Jack hammering works were stopped at 12:40 once environmental resource became aware. Details of the non-compliance was provided to the EPA in accordance with the EPL (R4.1 & R4.3 Report). Details of non-compliance was provided to SM, ER.
EVT-0002042	JHLOR	D37	Noise and vibration (in scope)	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	OOHW occurred on the week night (3rd/ 4th December 2024). The OOHW Pantograph Checks occurred the week previous under a OOH Permit and were deemed inaudible, however entry into Belmore Triangle resulted in a complaint at 01:15, 04/12/24. The works were not conducted under an OOH Permit. Entry into the corridor was restricted at Belmore Triangle for the rest of the week during OOH and the remaining works were added to an OOH Permit.

Table 6: Findings from this audit

Item	Condition	Type	Requirement	Finding	Recommended or completed action ⁵	By whom	Status ⁶
8256_Feb_1	C7	Opportunity for improvement	<i>Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.</i>	Non-compliance: The Auditor identified the following departures from the CNVMP as part of the audit: - The Auditor requested evidence to demonstrate that the noise levels of plant and equipment items are to be considered in the JHLOR procurement and rental decisions and in any case cannot be used on site unless compliant with the criteria, as per section 7.2, page 70 of the CNVMP. In response JHLOR provided evidence that showed that electrical light towers and low noise generators were prioritized. - For other fixed and mobile plant JHLOR provided evidence to show that consideration of noise within the procurement / rental decisions occurs once the process is underway or upon arrival on site (rather than prior to procurement proceeding). The records show that plant was a) selected on the basis that it was fit for the task (which is a key requirement for the activities being undertaken in the corridor), b) subject to review to confirm that the plant was identified in the CNVIS, c) that sound power levels were assessed to confirm levels were at or below that predicted in the CNVIS, and d) monitored during OOHV to verify that the OOHV were below predicted levels. The Auditor did not identify any instances of exceedances with predicted noise levels as part of this audit. - The Auditor requested evidence to demonstrate that delivery vehicles are to be fitted with straps rather than chains for unloading, wherever feasible and reasonable as per section 7.2, page 70 of the CNVMP. JHLOR's Primary Standard safety requirements for Cranes and Lifting does not permit the use of soft slings.	- At the next update to the CNVMP JHLOR should articulate how JHLOR implement the consideration of noise in the procurement and rental decisions, that reflects current practice. - At the next update of the CNVMP JHLOR should clarify the application of the commitment of the use of straps given that the Primary Standard safety requirements for Cranes and Lifting prevents the use of soft slings.	JHLOR	OPEN
8256_Feb_2	E18	Opportunity for improvement	<i>A detailed land use survey must be undertaken to confirm sensitive receivers (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 survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of Work which generate Construction or Operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Construction Noise and Vibration Impact Statement(s) or Operational Noise and Vibration Review, where relevant.</i>	Opportunity for Improvement: The land use survey does not appear to capture 10 Featherstone St, Bankstown as a residential receiver. The Auditor requested that JHLOR confirm: - the receiver type at this address - whether, for any OOHV conducted since commencement of SWM3, these receivers were subject to predicted noise impacts above the NML and, if so - what the predicted impacts were at 10 Featherstone St and what additional mitigation measures were offered/provided for the subject OOHV. In response, JHLOR stated: - The receiver is residential and has been misidentified in the land use survey. The land use survey is being checked to validate all properties along the S2B project. This will be completed by 14/03/25 - The continuous real time noise data has been reviewed. Periods of work were compared to periods of no work i.e. worksite closed (Tuesday 24th December until Wednesday 1st January). Although it was identified (as expected) that periods of work were at times louder than no work, when extrapolated did not trigger any additional mitigation measures at the sensitive receiver. - Additional mitigation measures or offers have not been triggered at 10 Featherstone.	Complete a comprehensive review of the Land Use Survey across the entire alignment to ensure all receivers are accurately categorised.	JHLOR	OPEN

⁵ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance in accordance with the terms of the Approval.

⁶ 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 ⁵	By whom	Status ⁶
8256_Feb_3	E29	Observation	<i>Mitigation measures must be implemented with the aim of achieving the following Construction noise management levels and vibration criteria:</i> <i>(a) Construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009);</i> <i>(b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</i> <i>(c) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and</i> <i>(d) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration-effects of vibration on structures (for structural damage).</i> <i>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.</i>	Observation: According to the ER Reports for the audit period, there were no deficiencies with noise and vibration management measures, with the exception of the following: 16/10/24: At Bankstown Station a subcontractor truck was observed to have a tonal reverse beacon fitted which was contrary to the CNVMP NVMM9. This appears to have been closed prior to the subsequent report having been prepared by the ER. 04/12/24: At Hurlstone Park a truck was left idling in close proximity to a receiver. The worker stated that this was so air conditioning could be operated in the hot conditions, which was considered by the ER to be a reasonable justification.	The ER has not identified the truck using a tonal beacon as an open item in the subsequent reports, and there is considered to be closed. The ER considers the use of air conditioning during hot weather to be reasonable. According to the ER reports and the complaints register, there does not appear to be repeat occurrences of this issue.	JHLOR	CLOSED

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

A review was conducted of the adequacy of the following documents relevant to the agreed audit scope:

- *Sydenham to Bankstown – Southwest Metro Conversion and Station Works Package 3 Construction Environmental Management Plan*, Revision 06, JHLOR, 14 November 2024 (the CEMP)
- *Southwest Metro – Southwest Metro Conversion and Station Works Package 3 Noise and Vibration Management Plan*, Revision 03, JHLOR, 12 September 2024 (the CNVMP)
- *Sydenham to Bankstown – Southwest Metro Conversion and Station Works Package 3 Heritage Management Plan*, Revision 03, JHLOR, 20 August 2024 (the CHMP) (confined to noise and vibration elements only)

The Auditor considers the documents to be adequate for the works being undertaken, noting the documents are essentially updated versions of management plans deployed on earlier packages of the Sydney Metro Southwest Project. This means that the documents have been reviewed, approved, implemented and audited previously (by persons other than the auditor) and have been subject to continual improvement.

The Auditor draws attention to the requirements relating to ensuring respite is achieved across multiple contractors (i.e.: JHLOR, interface contractors and third parties), as well as the need for JHLOR to undertake noise and vibration assessments of both their works, and the works of others. Evidence was provided to demonstrate that these requirements are being met, but the Auditor notes:

- In order to meet the aforementioned requirements JHLOR are relying on obtaining information from third parties on plant type, location, use and scheduling (over which they have little or no control). This creates a risk that JHLOR may fail to comply (with E26 and C7 [CNVMP, section 7.11], for example) through no fault of JHLOR.
- The processes in place to manage respite and cumulative impact assessment is highly reliant on the people within JHLOR (and Sydney Metro and associated parties), in that the process is not automated. If any key people were to leave the Project for whatever reason, then again the risk of a non-compliance occurring increases. Notwithstanding this, the Auditor is not recommending a change to the process adopted given this late stage of the Sydney Metro Southwest Project and the relative maturity of the process adopted.

3.4 Complaints

An complaints register is being maintained for the Project using the software, Consultation Manager, and was provided to the auditor on 14 February 2025. 43 x complaints were recorded on the register at the time of issue:

- Nine (9) were identified as not being related to Sydney Metro activities
- Twenty-four (24) were considered to be unavoidable as they related to approved works.

- Ten (10) were considered to be avoidable (these relate to worker behaviour or OOHW that had not been notified and were subsequently reported as non-compliances).

Table 7 gives a breakdown of the complaints by issue. Noise and vibration particularly in relation to OOHW make up the majority of complaints. This is expected considering this aspect has the greatest potential to cause annoyance on a project largely confined to the rail corridor and undertaking large portions of works under possession and during OOHW. 73% of complaints came from the Canterbury Bankstown LGA with 27% coming from Inner West Council LGA. This is obviously reflective of the works moving to the south-west of the corridor.

Table 7: Complaint breakdown by issue

Category	Proportion of total number of complaints recorded (%)
Noise & Vibration - OOHW	68%
Noise & Vibration - Standard hours	15%
Property - Damage/prevention	5%
Flora & Fauna	2%
Water & soil management	2%
Cumulative impacts	2%
Traffic, Transport & Parking	2%
Worker behaviour	2%

The Auditor considers the management of complaints on the Project to be adequate.

3.5 Incidents

There were no notifiable incidents reported / recorded for the audit period.

3.6 Environmental performance and effect on surrounding environment

The Auditor considers the environmental performance of the Project during the audit period to be sound and the potential effects on the surrounding environment to be well managed.

The works are relatively small in scale but are working within highly constrained environments in both a spatial and temporal sense. The works are largely conducted within the rail corridor, under possession and during OOHW. This means the potential for environmental impact and disturbance is predominantly associated with nuisance issues such as noise, worker behaviour. The risk of impacts associated with other environmental aspects (dust, vibration, soil and water, biodiversity and heritage) exist, but are not considered by the Auditor to be significant.

Noise is an issue on the project given the above and proximity to receivers and this plays out in the number and type of complaints received. That being said, JHLOR and Sydney Metro have demonstrated that they are implementing the management measures consistent with the terms of the Approval and the CNVMP (noting however the minor departures identified in tables 5 and 6 above). As noted in Section 3.3, this is not an easy task given the need to coordinate dozens of work packages being conducted across the alignment by JHLOR and other contractors.

To ensure the performance on the Project continues, it is recommended that JHLOR and Sydney Metro continue to focus on coordination of interfacing contractors and third parties for OOHW. The Auditor is of the view that this cannot be left to JHLOR alone and is a joint effort by the senior staff of all parties working on the south-west corridor.

4. CONCLUSIONS

This Independent Audit was conducted on the Southwest Metro Conversion and Station Works Package 3, covering the period of 14 September 2024 – 14 February 2025. The auditees comprised the John Holland Laing O'Rourke Joint Venture (JHLOR) and Sydney Metro, with the scope focusing on noise and vibration, namely:

- Compliance with Conditions C7, E19 – E30, and
- Implementation of select mitigation measures from the CNVMP, Sections 7.1 – 7.5, 7.11 – 7.12, 8.2, 8.4.

Works at Bankstown Station were inspected.

The Purpose of the audit was to

- assess the environmental performance of the CSSI, and its effects on the surrounding environment
- assess whether the Project is complying with the terms of this approval
- review the adequacy of any document required under this approval
- recommend measures or actions to improve the environmental performance of the CSSI, and improvements to any document required under the approval.

The overall outcome of the Independent Audit was positive. Records were well organised and available at the time of the site inspection and interviews with Project personnel from Sydney Metro and JHLOR. In summary:

- The non-compliances that were identified and reported by the auditees during the audit period are presented in Table 5. Five (5) non-compliances were identified and self-reported by the auditees during the audit period. These relate to protection of vegetation and unapproved OOHV.
- As part of the audit:
 - Fourteen (14) conditions were assessed.
 - No non-compliances were identified beyond those identified and self-reported by Sydney Metro.
 - Two (2) opportunities for improvement were identified in relation to reviewing and updating the CNVMP to clarify how certain commitments will be implemented and to review and update the land use survey to ensure all receivers are correctly categorised.
 - One (1) observation was raised regarding the ER identifying minor deficiencies in noise management practices on site.

The Auditor considers the management plans to be adequate for the works being conducted.

The Auditor draws attention to the requirements relating to ensuring respite is achieved across multiple contractors (i.e.: JHLOR, interface contractors and third parties), as well as the need for JHLOR to undertake cumulative noise and vibration assessments of both their works, and the works of others. Evidence was provided to demonstrate that these requirements were met during the audit period, but the Auditor notes:

- that a risk of non-compliance exists given JHLOR are relying on information from third parties; and due to the process not being automated
- the Auditor is not recommending a change to the process adopted given this late stage of the Sydney Metro Southwest Project and the relative maturity of the process, but
- to ensure the performance on the Project continues, it is recommended that JHLOR and Sydney Metro continue to focus on coordination of interfacing contractors and third parties for OOHW. The Auditor is of the view that this cannot be left to JHLOR alone and is a joint effort by the senior staff of all parties working on the south-west corridor.

The Auditor would like to thank the auditees representing Sydney Metro and JHLOR for their high level of organisation, cooperation, openness and assistance during the Independent Audit.

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APPENDIX A – SSI 8256 CONDITIONS OF APPROVAL SUBJECT TO AUDIT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
SCHEDULE 2				
C7	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.	CNVMP, Rev03, 21/02/25, Appendix B, (Land Use Survey) Email JHLOR to project team, 12/12/24 (notification of approved hours, need for OOHW, justification) Email JHLOR to project team, 20/09/24 (notification of approved hours, need for OOHW, justification) Bankstown DJD Brickwork SWMS, 20/12/24 (includes approved hours) Final S2B Project Induction June 2024 Safe Work Method Statement, SWM3-JHL-SWMS-00125, Lakemba Station Remaining Landscaping Demolition Works Safe Work Method Statement Checklist, 49, Bankstown SSJ Project, Redhill Constructions OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) OOHW Permit Bankstown, 04/11/24Noise Model, Ballast and trackwork, Bankstown, November 2024 EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3, 30/09/24 – 27/01/25 S2B Noise Plant Audit (no date), Sound Power level Data for 6T excavator, Ballast Train, Tamper, Front End Loader, 22T excavator, tracked loader, Telehandler, 22T wheel excavator Email JHLOR to JHLOR, 19/11/24 (communication on requirement of use battery powered light for OOHW) Email JHLOR to JHLOR, 27/09/24 (communication on the use of low noise generators and noise verification) Email JHLOR to JHLOR, 19/11/24 (communication on scheduling of jackhammering to daytime periods where possible) Email JHLOR to JHLOR, 28/11/24 (communication on delivery of the scaffolding needs to be in normal construction hours (Mon – Fri 0700 – 1800 & Sat 0800 - 1800) and OOHW only assemble the scaffolding on platform) Select Electric Lighttower invoice, 13/11/24, 20/12/24, 13/02/25 S2B Attended vibration Monitoring Register (no date) Sydney Metro Non-compliance : EVT-0002014 Sydney Metro Non-compliance : EVT-0002030	The Auditor reviewed implementation of select mitigation measures and commitments from Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.11, 7.12, 8.2, 8.4 of the CNVMP. The Auditor found a high degree of compliance / implementation with the following. Opportunity for improvement: The Auditor identified the following departures from the CNVMP as part of the audit: - The Auditor requested evidence to demonstrate that <i>the noise levels of plant and equipment items are to be considered in the JHLORJV procurement and rental decisions and in any case cannot be used on site unless compliant with the criteria, as per section 7.2, page 70 of the CNVMP</i>. In response JHLOR provided evidence that showed that electrical light towers and low noise generators were prioritized. - For other fixed and mobile plant JHLOR provided evidence to show that consideration of noise within the procurement / rental decisions occurs once the process is underway or upon arrival on site (rather than prior to procurement occurring). The records show that plant was a) selected on the basis that it was fit for the task (which is a key requirement for the activities being undertaken in the corridor), b) subject to review to confirm that it was identified in the CNVIS, c) that sound power levels were assessed to confirm levels were at or below that predicted in the CNVIS, and d) monitored during OOHW to verify that the OOHW were below predicted levels. The Auditor did not identify any instances of exceedances with predicted noise levels as part of this audit. - The Auditor requested evidence to demonstrate that <i>delivery vehicles are to be fitted with straps rather than chains for unloading, wherever feasible and reasonable</i> as per section 7.2, page 70 of the CNVMP. JHLOR's primary standard safety requirements for Cranes and Lifting does not permit the use of soft slings. Sydney Metro and its contractors identified the following non-compliances with the CEMP/CNVMP during the audit period: Non-compliance (JHLOR): Unapproved OOHW occurred at Dulwich Hill Station on 01/10/24 when preparing the station for shutdown by installing a few water barriers and ATF fencing Works were not notified and appropriate mitigations were not offered. This was in contravention of CEMP Table 11 hold point: Out of Hours Work (OOHW) Approval. Non-compliance (UGL/Hyundai): An unapproved OOHW occurred at Dulwich Hill Station on 19/11/24. A float was arranged and the driver attended site earlier than the allowable time of 7:00AM (4:40am). The OOHW were not notified, and appropriate mitigations were not offered to affected residents.	NC

		Sydney Metro Non-compliance : EVT-0002034 Sydney Metro Non-compliance : EVT-0002042 GPS tracker for letterbox drop Letter to residents, 'offer of respite' Sydney Metro 31/10/24 Noise Impact Assessment Scenario/Stage: NCA12 Letter to residents, 'offer of respite' Sydney Metro 21/11/24 JHLOR Primary Standard 'Cranes and Lifting', 13/09/23	Non-compliance (JHLOR): Unapproved tool (jack hammer) used in day OOH at Marrickville Sewer for pile trimming on 24/11/24. Jack hammering was not included in the noise model, as such was not permitted to be used. Appropriate mitigation and notification was not issued. Jack hammering works were stopped at 12:40 once environmental resource became aware. Details of the non-compliance was provided to the EPA in accordance with the EPL (R4.1 & R4.3 Report). Details of non-compliance was provided to SM, ER. Non-compliance (JHLOR): OOH Works Occurred on the week night (3rd/ 4th December 2024). The OOHW Pantograph Checks occurred the week previous under a OOH Permit and were deemed inaudible, however entry into Belmore Triangle resulted in a complaint at 01:15, 04/12/24. The works were not conducted under an OOH Permit. Entry into the corridor was restricted at Belmore Triangle for the rest of the week during OOH and the remaining works were added to an OOH Permit.	
PART E – KEY ISSUE CONDITIONS				
NOISE AND VIBRATION				
Land Use Survey				
E18	A detailed land use survey must be undertaken to confirm sensitive receivers (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 survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of Work which generate Construction or Operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Construction Noise and Vibration Impact Statement(s) or Operational Noise and Vibration Review, where relevant.	CNVMP, Rev03, 21/02/25, Appendix B, (Land Use Survey) SSI 8256 Independent Audit RFI2 (JHLOR response)	The Land Use Survey is presented in revision 3 of the NVMP. Opportunity for Improvement: The land use survey does not appear to capture 10 Featherstone St, Bankstown as a residential receiver. The Auditor requested that JHLOR confirm: - the receiver type at this address - whether, for any OOHW conducted since commencement of SWM3, these receivers were subject to predicted noise impacts above the NML and, if so - what the predicted impacts were at 10 Featherstone St and what additional mitigation measures were offered/provided for the subject OOHW. In response, JHLOR stated: <i>The receiver is residential and has been misidentified in the land use survey. The land use survey is being checked to validate all properties along the S2B project. This will be completed by 14/03/25</i> <i>The continuous real time noise data has been reviewed. Periods of work were compared to periods of no work i.e. worksite closed (Tuesday 24th December until Wednesday 1st January). Although it was identified (as expected) that periods of work were at times louder than no work, when extrapolated did not trigger any additional mitigation measures at the sensitive receiver.</i> <i>Additional mitigation measures or offers have not been triggered at 10 Featherstone.</i>	C
Work Hours				

E19	Work must only be undertaken during the following Construction hours: (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.	Email JHLOR to project team, 12/12/24 (notification of approved hours, need for OOHW, justification) Email JHLOR to project team, 20/09/24 (notification of approved hours, need for OOHW, justification) Bankstown DJD Brickwork SWMS, 20/12/24 (includes approved hours) Final S2B Project Induction June 2024 Safe Work Method Statement, SWM3-JHL-SWMS-00125, Lakemba Station Remaining Landscaping Demolition Works Safe Work Method Statement Checklist, 49, Bankstown SSJ Project, Redhill Constructions OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) OOHW Permit Bankstown, 04/11/24	The auditees provided evidence to show that approved hours are being communicated to project personnel and incorporated into work methods. OOHWs are identified and tracked and approved prior to commencing.	C
Variation to Work Hours				
E20	Notwithstanding Conditions E19 and E24 Work may be undertaken outside the hours specified in the following circumstances: (a) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (b) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (c) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (d) Work approved under an Out-of-Hours Work Protocol for Work not subject to an EPL as required by Condition E25; or (e) construction that causes LAeq(15 minute) noise levels: (i) no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), and (ii) 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, and (iii) continuous or impulsive vibration values, measured at the most affected residence are no more than the maximum values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), and (iv) intermittent vibration values measured at the most affected residence are no more than the maximum values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006). (f) where a negotiated agreement has been reached with a substantial majority of sensitive receivers who are within the vicinity of and may be potential affected by the particular Construction, and the noise management levels and/or limit for ground-borne noise and vibration (human comfort) cannot be achieved. All agreements must be in writing and a copy forwarded to the Planning Secretary at least one (1) week before the commencement of activities. <i>Note: Section 5.24(1)(e) of the EP&A Act requires that an EPL be substantially consistent with this approval.</i>	Email JHLOR to project team, 12/12/24 (notification of approved hours, need for OOHW, justification) Email JHLOR to project team, 20/09/24 (notification of approved hours, need for OOHW, justification) Bankstown DJD Brickwork SWMS, 20/12/24 (includes approved hours) Final S2B Project Induction June 2024 Safe Work Method Statement, SWM3-JHL-SWMS-00125, Lakemba Station Remaining Landscaping Demolition Works Safe Work Method Statement Checklist, 49, Bankstown SSJ Project, Redhill Constructions OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) OOHW Permit Bankstown, 04/11/24 Noise Model, Ballast and trackwork, Bankstown, November 2024	The auditees provided evidence to show that approved hours are being communicated to project personnel and incorporated into work methods. OOHWs are identified and tracked and approved prior to commencing. OOHW permits identify the relevant approval pathway, incorporating the requirements from this condition. The OOHW permits are then signed off by JHLOR management prior to commencement.	C

E21	On becoming aware of the need for emergency Work in accordance with Condition E20(b), the Proponent must notify the ER and the EPA (if a EPL applies) of the need for that Work. The Proponent must use best endeavours to notify all noise and/or vibration affected sensitive receivers of the likely impact and duration of those works.	Interview with auditees 14/02/25	The auditees did not communicate the occurrence of any emergency works during the audit period.	NT
Out-of-Hours Work Scheduling and Respite				
E22	Out-of-Hours Work that are regulated by an EPL as per Condition E20(c) or through the Out-of-Hours Work Protocol as per Condition E25 include: (a) Work which could result in a high risk to construction personnel or public safety, based on a risk assessment carried out in accordance with AS/NZS ISO 31000:2009 "Risk Management – Principles and Guidelines"; or (b) where the relevant road authority has advised the Proponent in writing that carrying out the activities could result in a high risk to road network operational performance; or (c) where the relevant utility service operator has advised the Proponent in writing that carrying out the activities could result in a high risk to the operation and integrity of the utility network; or (d) where the Transport for NSW Transport Management Centre (or other road authority) has advised the Proponent in writing that a road occupancy licence is required and will not be issued for the activities during the hours specified in Conditions E19 and E20; or (e) where Sydney Trains (or other rail authority) has advised the Proponent in writing that a Rail Possession is required. <i>Note: Other Out-of-Hours Work can be undertaken with the approval of an EPL, or through the project's Out-of-Hours Work Protocol for Work not subject to an EPL.</i>	Final S2B Project Induction June 2024 Safe Work Method Statement, SWM3-JHL-SWMS-00125, Lakemba Station Remaining Landscaping Demolition Works Safe Work Method Statement Checklist, 49, Bankstown SSJ Project, Redhill Constructions Safe Work Method Statement Checklist, 81, Bankstown Masonry Works, DJD Brickwork OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) OOHW Permit Bankstown, 04/11/24 Noise Model, Ballast and trackwork, Bankstown, November 2024	The auditees provided evidence to show that approved hours are being communicated to project personnel and incorporated into work methods. OOHWs are identified and tracked and approved prior to commencing. OOHW permits identify the relevant approval pathway, incorporating the requirements from this condition. The OOHW permits are then signed off by JHLOR management prior to commencement. Predominantly OOHW are required on the Project under items E22(a) and (e)	C
E23	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. This consultation must include (but not be limited to) providing the community with: (a) a schedule of likely Out-of-Hours Work for a period no less than two (2) months; (b) the potential work, location and duration; (c) the noise characteristics and likely noise levels of the Work; and (d) likely mitigation and management measures The outcomes of the community consultation, the identified respite periods and the scheduling of the likely Out-of-Hours Work must be provided to the EPA (if an EPL applies) and the Planning Secretary (for high risk activities after 9pm) upon request.	OOHW Construction Notifications, https://www.sydneymetro.info/station/marrickville-station https://www.sydneymetro.info/station/canterbury-station https://www.sydneymetro.info/station/bankstown-station https://www.sydneymetro.info/station/punchbowl-station https://www.sydneymetro.info/station/wiley-park-station https://www.sydneymetro.info/station/lakemba-station https://www.sydneymetro.info/station/belmore-station OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) Noise Model, Ballast and trackwork, Bankstown, November 2024 Letter 31/10/24, Sydney to Bankstown Works (notice of eligibility for respite for November OOHW) Letterbox distribution maps: https://app.managemypost.com/map/Ryt0ZXZjVmYyS FN6WGRYUUhCcDZoQT090 OOHW Permit Bankstown, 04/11/24	Notifications to affected receivers are made monthly to satisfy this condition. No issues observed. The auditees are not aware of any request from the EPA or DPHI in this regard.	C

		Email JHLOR to JHLOR, 11/11/24 (direction for OOHW owners to review the WCR to confirm the location, plant and dates/times are correct – therefore allowing them to be incorporated into the model and permit). SSJ Respite map/tracker https://www.google.com/maps/d/viewer?mid=1JhwUD00Kh7EryVngAcY6sXhJrqXETRE&ll=33.91618878605183%2C151.04449722958557&z=14		
Highly Noise Intensive Works				
E24	Except as permitted by an EPL, highly noise intensive Work that result in an exceedance of the applicable Noise Management Level at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three (3) hours each with a minimum respite from those activities and Works of not less than one (1) hour between each block. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour respite between ceasing and recommencing any of the work that are subject of this condition.	Interview with auditees, 14/02/25 CNVIS, JHLOR, 22/08/24 SWMS Pile Trimming, 29/10/24 Bankstown DJD Brickwork SWMS, 20/12/24 (includes approved hours) Final S2B Project Induction June 2024 Safe Work Method Statement, SWM3-JHL-SWMS-00125, Lakemba Station Remaining Landscaping Demolition Works Safe Work Method Statement Checklist, 49, Bankstown SSJ Project, Redhill Constructions EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3, 30/09/24 – 27/01/25	The CNVIS identifies a range of scenarios that exceed 75dB(A). JHLOR are of the view that these are very conservative, and that in reality the work activities are less intense. Verification monitoring has been conducted to verify that actual noise impacts are at or below predictions. The auditees have not identified any activities that would be at risk of exceeding the highly noise affected NML. Requirements around the 3 on 1 off rule are captured in the relevant SWMS and communicated to the workforce.	C
Out-of-Hours Work Protocol – Works not subject to an EPL				
E25	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of Work which are outside the hours defined in Condition E19, and that are not subject to an EPL. The Protocol must be approved by the Planning Secretary before commencement of the Work. The Protocol must: (a) provide a process for the consideration of Out-of-Hours Work against the relevant noise and vibration criteria, including the determination of low and high-risk activities; (b) provide a process for the identification of mitigation measures for residual impacts, including respite periods in consultation with the community at each affected location, consistent with the requirements of Condition E23; (c) identify procedures to facilitate the coordination of Out-of-Hours Work approved by an EPL to ensure appropriate respite is provided; (d) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) low risk activities and high risk activities that cease by 9pm can be approved by the ER, and (ii) all other high risk activities that are approved by the Planning Secretary; and (e) identify Planning Secretary, EPA and community notification arrangements for approved Out-of-Hours Works, which may be detailed in the Community Communication Strategy.	CNVMP, Rev03, 21/02/25, Appendix F (OOHW Protocol) https://www.sydneymetro.info/sites/default/files/2022-10/CSW-OOHWS-Strategy-Protocol-v5.3.pdf	The OOHW Protocol was established by Sydney Metro (and approved by DPHI) prior to the current audit period. The Protocol addresses the requirements from this condition.	C
Out-of-Hours Work – Utility Coordination and Respite				

E26	Work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any works to provide respite to impacted noise sensitive receivers so that the respite is achieved in accordance with Condition E23; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive receivers; and (c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation.	OOHW Approval folders (JHLOR network folders) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3, 30/09/24 – 27/01/25 EPL 21147 R4.4 Validation Report, Hyundai Movex/UGL (interface contractor) , 13/01/25 CBC Culvert & Bankstown Up Platform Interface Meeting #18, #19, #20 and #21 JHLOR WhiteBoard (lookahead) WE12-WE13, WK15-WK19, WK27-WK30 SSI 8256 Independent Audit RFI2 (JHLOR response)	According to JHLOR, 1. <i>The WCR captures all Sydney Metro packages. Please check WCR against an OOHW Model for the same area and time period.</i> <i>All works occurring in the same area at the same time are modelled concurrently (based on the WCR) to produce a conservative worst-case prediction. To date, there have been no exceedances of predictions.</i> 2. <i>Generally, the high noise impact works are transient in nature with the majority of the time being 'quieter periods' with occasional louder periods. See examples below;</i> a. <i>HV Pole Removal: equipment: Chainsaw, cherry picker, crane, rattle gun.</i> i. <i>Poles are typically 60m a part but vary across site.</i> ii. <i>Getting plant in position takes ~2hrs give or take 20 to 30mins.</i> iii. <i>Actual pole removal takes 15 to 30mins.</i> iv. <i>Each pole requires two cuts using a chain saw (HNI). Each cut takes 5mins.</i> v. <i>The HNI is infrequent enough not to require 3:1 and the SR frame of reference changes by 60m every 3 hours or so.</i> b. <i>Track grinding occurs at a rate of 1 to 2km per hour. The blade needs servicing frequently hence grinding is not only transient, but also intermittent.</i> c. <i>Tamping and regulating occurs at a rate of ~2km/12hr shift (26.4km completed in 14 shifts). Varies from section to section, but generally most straight forward areas have been completed in 1 pass. For complicated areas, it can take multiple shifts and up to 4 passes to get to design alignment.</i> d. <i>Sewer breakout works; jack hammering occurred at Marrickville sewer during day time hours. This is a static HNI location. A noise logger was set up to capture the noisy works. Typically to validate respite periods noise data is graphed, however in this noise environment adjacent to an active goods line (ARTC) and frequent air traffic, respite periods cannot be distinguished when in place. Refer to R4.4 validation reports. The majority of exceedances are occurring due to extraneous noise events (see spreadsheet in folder identifying the general noise environment in the absence of construction).</i> e. <i>Asset Removal using jack hammer.</i> i. <i>The largest concrete footing is 0.6m * 0.6m by 0.5m depth</i> ii. <i>Jackhammer for the footing only last for less than 5minutes.</i> iii. <i>Only one footing being jackhammered in OOHW period, attended monitoring shows low impact</i>	C
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			and no exceedance. All other footings being removed in standard construction hours. Activity b & c (Rail adjustment, tamping and regulating) is permitted anytime during a LPA by EPL 21147 Condition L5.6 without respite periods, however are dynamic location activities, so the same sensitive receiver is not impacted by the same plant. Despite modelling all concurrent works, the validation process and observation has identified that noise impacts are typically generated by 1 piece of dominant plant, not as a result of concurrent work and noise peaks are commonly due to extraneous noise sources. 3. In undertaking utility or local area works, respite periods are governed by EPL Condition L5.7. Condition L5.8 requires cumulative consideration of L5.7 (Local area and utility) works occurring in the vicinity of L5.6 (LPA) works in the same time frames. Since the 30th Of September a number of utility/local area work has occurred, not triggering the 3 day/week, 10 days/ Month requirement because they were completed in 1 night.' The current Worksite Coordination Register (WCR) identifies proposed OOHW to be conducted by JHLOR, interfacing contractors and interfacing contractors and packages including TSOM, SWM4, 5, 6 etc and CIDS/ODS. The register shows that each packages OOHW are considered in the context of others so as to ensure that respite is achieved. Communication on all works, including third parties are also identified in interface meeting minutes and WhiteBoards . The OOHW Applications sighted include a comprehensive list of plant which generally aligns with JHLORs statement regarding modelling concurrent plant and equipment. Given the above, and the terms of EPL 21147 and the associated R4.4 reports, the auditor is of the view that respite coordination is occurring.	
Construction Noise and Vibration - General				
E27	Construction Noise and Vibration Impact Statements must be prepared for Construction sites before Construction noise and vibration impacts commence and include specific mitigation measures identified through consultation with affected sensitive receivers. The Statements must augment the Construction Noise and Vibration Management Sub-plan and must be implemented for the duration of Work. The Statements must be informed by a suite of potential management/mitigation options provided in the Construction Noise and Vibration Sub-plan.	CNVMP, Rev03, 21/02/25, Appendix D (CNVIS) OOHW Worksite Coordination register (WCR) for 04/11/24 – 14/02/25 (and OOHW permits issued Nov 24 - Feb 25) EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3, 30/09/24 – 27/01/25 Select plant onboarding module (online) and boom lift #011219 inspection record. Site photos showing generators with noise blankets, Dulwich Hill, Hurlstone Park Site photos of demolition at Bankstown, showing use of grabbers instead of hammer (no date). Built view inspection photos 19/11/24 (Canterbury Station) S2NB Noise Plant Audit (no date), Sound Power level Data for 6T excavator, Ballast Train, Tamper, Front End Loader, 22T excavator, tracked loader, Telehandler, 22T wheel excavator	One CNVIS has been prepared for the SWM3 works and forms part of the CNVMP. CNVIS requirements have been considered in the OOHW application and modelling process. Controls are monitored and monitoring verifies results. Monitoring results during the reporting period (reported via the EPL 21147 R4.4 Validation Reports) show that construction noise is at or below the levels predicted in the CNVIS.	C

		SSI 8256 Independent Audit RFI2 (JHLOR response)		
E28	Noise generating Work in the vicinity of potentially-affected community, religious, or educational institutions resulting in noise levels above the noise management levels must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution or as otherwise approved by the Planning Secretary.	CNVMP, Rev03, 21/02/25, Appendix B, (Land Use Survey) OOHW Worksite Coordination Register (WCR) for 04/11/24 – 14/02/25 (and OOH permits issued Nov 24 - Feb 25) EPL 21147 R4.4 Validation Reports SWMC Final Conversion Stage-3, 30/09/24 – 27/01/25 SSI 8256 Independent Audit RFI2 (JHLOR response)	The Land Use Survey identifies community, religious, or educational institutions proximal to the Project works. Part B, item 6.0 of the OOH permit process requires identification and assessment of OOH for sensitive receivers in line with this condition. For the OOH permits sighted there have not been OOH conducted that have triggered the need for rescheduling or approval from the Planning Secretary. Monitoring results during the reporting period (reported via the EPL 21147 R4.4 Validation Reports) show that construction noise is at or below the levels predicted in the CNVIS.	C
E29	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); (c) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and (d) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). <i>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.</i>	CNVMP, Rev03, 21/02/25 Site inspection, 14/02/25 OOHW Worksite Coordination Register (WCR) for 04/11/24 – 14/02/25 (and OOH permits issued Nov 24 - Feb 25) ER Inspection Reports, 15/10/24 – 04/02/25 Select plant onboarding module (online) and boom lift #011219 inspection record. Metro Road Rail Vehicle (Highrail 10t) Premobilisation Checklist, 11/12/24 Email JHLOR to JHLOR 20/11/24 (communication that track cutting to be completed before 18:00) Site photos showing generators with noise blankets, Dulwich Hill, Hurlstone Park Site photos of demolition at Bankstown, showing use of grabbers instead of hammer (no date). Built view inspection photos 19/11/24 (Canterbury Station) S2NB Noise Plant Audit (no date), Sound Power level Data for 6T excavator, Ballast Train, Tamper, Front End Loader, 22T excavator, tracked loader, Telehandler, 22T wheel excavator Email JHLOR to JHLOR, 19/11/24 (communication on requirement of use battery powered light for OOH) Email JHLOR to JHLOR, 19/11/24 (communication on scheduling of jackhammering to daytime periods where possible) Email JHLOR to JHLOR, 28/11/24 (communication on delivery of the scaffolding needs to be in normal construction hours (Mon – Fri 0700 – 1800 & Sat 0800 - 1800) and OOH only assemble the scaffolding on platform) Select Electric Lighttower invoice, 13/11/24, 20/12/24, 13/02/25 S2B Attended vibration Monitoring Register (no date) SSI 8256 Independent Audit RFI2 (JHLOR response)	At the inspection it was observed that saw cutting at Bankstown Station was positioned away from receiver as best as possible and was shielded. All plant and equipment goes through an onboarding process whereby it is checked to ensure its maintained in a proper and efficient manner and has non-tonal beacons fitted. High risk plant undergoes sound power level monitoring to ensure its emissions are at or below that defined in the CNVMP. Higher noise activities are generally prioritized during less sensitive times where possible, as evidence through the Worksite Coordination Register (WCR) for 04/11/24 – 14/02/25 (and OOH permits issued Nov 24 - Feb 25). Additional scheduling options are discussed by the team as evidence through emails chains sighted. Observation: According to the ER Reports for the audit period, there were no deficiencies with noise and vibration management measures, with the exception of the following: 16/10/24: At Bankstown Station a subcontractor truck was observed to have a tonal reverse beacon fitted which was contrary to the CNVMP NVMM9. This appears to have been closed prior to the subsequent report having been prepared by the ER. 04/12/24: At Hurlstone Park a truck was left idling in close proximity to a receiver. The worker stated that this was so air conditioning could be operated in the hot conditions, which was considered by the ER to be a reasonable justification.	C

E30	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring at heritage-listed structures	CNVMP, Rev03, 21/02/25 CHMP, Rev03, 20/08/24 S2B Attended vibration Monitoring Register (no date) SSI 8256 Independent Audit RFI2 (JHLOR response)	Section 8.2 of the CNVMP states that for monitoring of works around the Stations, CoA E30 requires that a heritage specialist be consulted when installing equipment used for vibration, movement and noise monitoring around heritage listed structures. Generally noise and vibration monitors do not affect the building fabric in any way. Noise and vibration loggers will be secured such that any chains do not damage the building, and so that they are unlikely to be knocked over and thereby damage surfaces. 8.2.2 goes on to say that this monitoring would be conducted when working within the safe working distance and that locations of proposed vibration monitoring, both attended and unattended, must be provided to Sydney Metro for review and consultation as required, at least one week prior to the vibration-generating works commencing. This information can be provided in Out-of-Hours Works Applications, or separately if the works are proposed to be carried out during Standard work hours. The Auditor requested clarification on how this has been achieved during the audit period. JHLOR stated that <i>No instances of breaches of safe work distances. Any monitoring was conducted due to specific equipment used despite being outside the safe working distance confinement.</i> The attended vibration monitoring register was sighted and there were no exceedances of the relevant criteria.	NT
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APPENDIX B – SITE PHOTOS

No.	Comment	Photo
1	Bankstown Station site access, stabilised and free from material tracking	
2	Chemicals were stored in a bunded container	
3	Spoil bays had controls placed at rear and geofabric ready for covering in the event of wet weather.	
4	Masonry cutting stations x 2 surrounded by noise blankets and positioned in the centre of site.	
5	Masonry cutting station surrounded by noise blankets.	

No.	Comment	Photo
6	Plant select onboarding and check process includes requirement for non-tonal beacons.	
7	Protective hoarding in place of adjacent heritage building and Bankstown station platform.	
8	Tree protection zone in place.	
9	Heritage maps and ECMs placed on site noticeboard.	

APPENDIX C – DECLARATION

Declaration of Independence - Auditor



Project Name:	Sydney Metro Southwest
Consent Number:	SSI 8256
Description of Project:	Conversion of the T3 Bankstown Line (between Sydenham and Bankstown (or S2B)) to metro standards
Project Address:	Sydney Metropolitan Area
Proponent:	Sydney Metro
Title of Audit	Southwest Metro Conversion and Station Works Package 3 – Independent Audit February 2025
Date:	14/03/25

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:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- 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
- 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.

Refer page 2 of this document for declarations regarding WolfPeak's non-audit involvement in the Project. These were declared to the Department prior to the audit and approval of the audit team.

Notes:

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

Name of Proposed Auditor:	██████████
Signature:	██████████
Qualification:	Master of Environmental Engineering Management Exemplar Global Certified Lead Environmental Auditor (No. 114283)
Company:	WolfPeak Group Pty Ltd

Declarations of involvement

WolfPeak's auditor has not had any involvement in the Project. Regarding other WolfPeak employees, WolfPeak would like to declare the following involvement in the Project:

Two (2) staff members are providing sustainability support to one of the contractors on the TSOM package. These persons do not form part of any of the audit teams used on Sydney Metro. This was declared to Sydney Metro in 2023 and 2024.

Controls in place to manage potential conflict

The following controls were in place to manage potential conflicts during the Independent Audit.

- WolfPeak will not audit and has not audited its own work.
- None of the nominated WolfPeak audit team have provided or will provide any other services to the Project.
- The WolfPeak audit team has signed non-disclosure agreements with Sydney Metro.
- The following controls are in place to manage the potential for unintended sharing of information:
 - The WolfPeak audit team has not had and does not have access to the Sydney Metro or contractor/s systems and drives unless this was arranged by the contractor during an Independent Audit in their role as an auditee and as a method of sharing files for the purposes of being subject to audit.
 - The WolfPeak Project (i.e.: Sydney Metro Independent Audit services) files / folders have been / will continue to be locked so only the WolfPeak audit team has access.
- WolfPeak employees supporting TSOM are not the owner of any of the documents being produced, nor do they relate to any conditions or requirements that were subject to audit.
- WolfPeak employees supporting TSOM are not responsible for site works on which audit inspection occurred.



2 July 2025

[REDACTED]
[REDACTED]
Sydney Metro

Dear [REDACTED]

RE: Southwest Metro Conversion And Station Works Package 3 – Audit follow up

As you know an Independent Audit on Southwest Metro Conversion And Station Works Package 3 was conducted on 14 February 2025, with the final Audit Report submitted to the Department 6 weeks afterwards.

Section 2.3.3 of the *Services Brief Independent Environmental Auditing Services* requires that within one month of submitting the final Audit Report, a follow-up audit will be conducted for the purposes of ensuring that appropriate progress has been made, or is being made, to address audit findings raised during the Independent Audit.

The follow up was conducted on 1 May. Close out evidence was provided by Sydney Metro to WolfPeak on 26 June 2025. This letter summarises this follow up activity and specifies:

- Details of the relevant audit
- Each finding and its status (reported by exception)
- Actions taken, or planned to be taken, to resolve audit findings; and
- Any relevant performance related commentary.

Details of the Independent Audit

Title: Independent Audit, Southwest Metro Conversion And Station Works Package 3 – SSI 8256

Audit Period: 14 September 2024 – 14 February 2025.

The auditees: John Holland Laing O'Rourke Joint Venture (JHLOR) and Sydney Metro.

Audit Scope: Noise and vibration; Conditions E19 – E30 and CNVMP Sections 7.1 – 7.5, 7.11 – 7.12, 8.2, 8.4.

The scope comprised:

- assess the environmental performance of the CSSI, and its effects on the surrounding environment (refer Sections 3.2, 3.4 and 3.6 of the Audit Report)
- assess whether the Project is complying with the terms of this approval (refer Section 3.2 and Appendix A of the Audit Report)
- review the adequacy of any document required under this approval (refer Section 3.3 of the Audit Report)



- recommend measures or actions to improve the environmental performance of the CSSI, and improvements to any document required under the approval (refer Sections 3.2 and 3.6 of the Audit Report).

Findings, status and actions taken / planned to be taken to address findings

Refer Appendix A. The Auditor has no further commentary to add.

Should you have any queries or require further information please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J. S.', written over a light blue circular stamp.Two lines of blacked-out text, likely redacting contact information such as a phone number and email address.



APPENDIX A - FINDINGS, STATUS AND ACTIONS TAKEN / PLANNED TO BE TAKEN TO ADDRESS FINDINGS



Table 1: Update on status of findings that were considered open at the time of completion of the Independent Audit.

Item	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By whom	Status ²
8256_Feb_1	C7	Opportunity for improvement	<i>Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP sub-plans for that stage have been approved by the Planning Secretary.</i>	Non-compliance: The Auditor identified the following departures from the CNVMP as part of the audit: - The Auditor requested evidence to demonstrate that the noise levels of plant and equipment items are to be considered in the JHLOR procurement and rental decisions and in any case cannot be used on site unless compliant with the criteria, as per section 7.2, page 70 of the CNVMP. In response JHLOR provided evidence that showed that electrical light towers and low noise generators were prioritized. For other fixed and mobile plant JHLOR provided evidence to show that consideration of noise within the procurement / rental decisions occurs once the process is underway or upon arrival on site (rather than prior to procurement proceeding). The records show that plant was a) selected on the basis that it was fit for the task (which is a key requirement for the activities being undertaken in the corridor), b) subject to review to confirm that the plant was identified in the CNVIS, c) that sound power levels were assessed to confirm levels were at or below that predicted in the CNVIS, and d) monitored during OOHV to verify that the OOHV were below predicted levels. The Auditor did not identify any instances of exceedances with predicted noise levels as part of this audit. - The Auditor requested evidence to demonstrate that delivery vehicles are to be fitted with straps rather than chains for unloading, wherever feasible and reasonable as per section 7.2, page 70 of the CNVMP. JHLOR's Primary Standard safety requirements for Cranes and Lifting does not permit the use of soft slings.	- At the next update to the CNVMP JHLOR should articulate how JHLOR implement the consideration of noise in the procurement and rental decisions, that reflects current practice. - At the next update of the CNVMP JHLOR should clarify the application of the commitment of the use of straps given that the Primary Standard safety requirements for Cranes and Lifting prevents the use of soft slings.	JHLOR	This finding is considered closed. - A new Site Request Form has been developed to ensure noise levels of plant and equipment are considered in the procurement process. Refer Appendix H of the CNVMP (Rev 05, 15/06/25) - The CNVMP has been updated to remove the commitment of the use of straps given that the Primary Standard safety requirements for Cranes and Lifting prevents the use of soft slings. Refer Section 7.2 of the CNVMP (Rev 05, 15/06/25).

¹ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance in accordance with the terms of the Approval.

² 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 ¹	By whom	Status ²
8256_Feb_2	E18	Opportunity for improvement	<i>A detailed land use survey must be undertaken to confirm sensitive receivers (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 survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of Work which generate Construction or Operational noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Construction Noise and Vibration Impact Statement(s) or Operational Noise and Vibration Review, where relevant.</i>	Opportunity for Improvement: The land use survey does not appear to capture 10 Featherstone St, Bankstown as a residential receiver. The Auditor requested that JHLOR confirm: - the receiver type at this address - whether, for any OOHV conducted since commencement of SWM3, these receivers were subject to predicted noise impacts above the NML and, if so - what the predicted impacts were at 10 Featherstone St and what additional mitigation measures were offered/provided for the subject OOHV. In response, JHLOR stated: <i>The receiver is residential and has been misidentified in the land use survey. The land use survey is being checked to validate all properties along the S2B project. This will be completed by 14/03/25</i> <i>The continuous real time noise data has been reviewed. Periods of work were compared to periods of no work i.e. worksite closed (Tuesday 24th December until Wednesday 1st January). Although it was identified (as expected) that periods of work were at times louder than no work, when extrapolated did not trigger any additional mitigation measures at the sensitive receiver.</i> <i>Additional mitigation measures or offers have not been triggered at 10 Featherstone.</i>	Complete a comprehensive review of the Land Use Survey across the entire alignment to ensure all receivers are accurately categorised.	JHLOR	This finding is considered closed. The updated Land Use Survey is presented in the CNVMP (Rev 05, 15/06/25).

Item	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By whom	Status ²
8256_Feb_3	E29	Observation	<i>Mitigation measures must be implemented with the aim of achieving the following Construction noise management levels and vibration criteria:</i> <i>(a) Construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009);</i> <i>(b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</i> <i>(c) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and</i> <i>(d) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration-effects of vibration on structures (for structural damage).</i> <i>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.</i>	Observation: According to the ER Reports for the audit period, there were no deficiencies with noise and vibration management measures, with the exception of the following: 16/10/24: At Bankstown Station a subcontractor truck was observed to have a tonal reverse beacon fitted which was contrary to the CNVMP NVMM9. This appears to have been closed prior to the subsequent report having been prepared by the ER. 04/12/24: At Hurlstone Park a truck was left idling in close proximity to a receiver. The worker stated that this was so air conditioning could be operated in the hot conditions, which was considered by the ER to be a reasonable justification.	The ER has not identified the truck using a tonal beacon as an open item in the subsequent reports, and there is considered to be closed. The ER considers the use of air conditioning during hot weather to be reasonable. According to the ER reports and the complaints register, there does not appear to be repeat occurrences of this issue.	JHLOR	This finding was considered closed at the time of the audit. No further action required.