

## SM – WSA CSSI 10051

## Sydney Metro Response to Combined Audit No.8 Findings

| Item       | Ref  | Type                           | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                       | Finding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Recommended or completed action <sup>1</sup> | By Whom     | Status <sup>2</sup> | Sydney Metro Response |
|------------|------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|-------------|---------------------|-----------------------|
| IA4 – NC01 | C10  | Non-Compliance (self-Reported) | Construction must not commence until the CEMP and all CEMP Subplans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction. | <b>NCR 010 (1/3/2025): Condition C10 (Flora &amp; Fauna Management Plan - Mitigation measure FF_M7) &amp; REMM LV2. The TPZ was not established which is a requirement of the Flora and Fauna Subplan. Notification of the NC to DPHI was on 16/3/2025 and not within the required 7-day timeframe. Refer also to Condition A44.</b>                                                                                                                                                                                                    | Nil                                          | SSTOM (PLM) | CLOSED              | N/A                   |
| IA4-NC02   | E38  | Non-Compliance (self-Reported) | Work must only be undertaken during the following hours:<br>a) 7:00am to 6:00pm Mondays to Fridays, inclusive;<br>b) 8:00am to 6:00pm Saturdays; and<br>c) (c) at no time on Sundays or public holidays.                                                                                                                                                                                                                                          | <b>NCR 008 was raised against Condition E38 on 13/2/2025. Parklife Metro received a complaint on 13 February 2025 at 05:40 with regards to noise, truck movement and light spill. The issue was investigated and was identified that there was a miscommunication with timing between the Parklife Metro supervisor and DMT float driver. This resulted in a frontend loader driving onto the float and removed off-site via Gate 1 onto Lansdowne Road, outside of standard construction hours and without an approved OOH permit.</b> | Nil                                          | SSTOM (PLM) | CLOSED              | N/A                   |
| IA4-NC03   | E105 | Non-Compliance (self-Reported) | Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in Condition A1 must be approved by the Planning Secretary and be included in the CTMP.                                                                                                                                                                                            | <b>NCR 011 (31/3/2025): Condition E105. A Cono (PLM sub-contractor) dump truck was observed delivering materials to an Orchard Hills SSTOM site (Linewide North – Lansdowne to Patons Lane) via local roads that are not covered under an approved HVLR / CTMP. Notification of the NC to DPHI was on 4/4/205, within the required 7-day timeframe. Refer also to Condition A44.</b>                                                                                                                                                    | Nil                                          | SSTOM (PLM) | CLOSED              | N/A                   |
| IA4-NC03   | E105 | Non-Compliance (self-Reported) |                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>NCR 012 (15/7/2025): Condition E105 &amp; E106. On 11/7/2025 at approximately 8:45am, a Boral agitator truck was observed on Lethbridge Street, St Marys delivering concrete to the St Marys Station site.</b>                                                                                                                                                                                                                                                                                                                       | Nil                                          | SSTOM (PLM) | CLOSED              | N/A                   |

<sup>1</sup> The recommended action does not preclude the need for all non-compliances to be reported by the proponent in accordance with A44/A45. SSTOM (PLM)

<sup>2</sup> Status of finding and action according to the Auditor at the time of finalizing the Report.

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|                                    |      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Following an investigation, it was confirmed the concrete agitator utilised Chapel, Lethbridge and Station Streets which are not approved within the St Marys CTMP for HV haulage. Refer also to Condition A44.                                                                                                                                                                      |                                                                                                                                                                                                                                                             |             |        |                                                                                                                                                                                                                                                                                                                                                                                                            |
| IA4-NC05                           | E121 | Non-Compliance (self-Reported) | The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW. | The construction methodology for viaduct concrete works over the Warragamba Pipeline that was agreed with WaterNSW was not followed when a concrete boom delivering concrete to the viaduct entered the 'no slew zone'. Refer also to Condition A44.                                                                                                                                 | Nil                                                                                                                                                                                                                                                         | SSTOM (PLM) | CLOSED | N/A                                                                                                                                                                                                                                                                                                                                                                                                        |
| IA4 – OBS 1<br>Morasey Environment | E103 | Observation                    | Construction Traffic Management Plans (CTMPs) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the CTMPs must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant CTMP.                                                                                                                                                                                                  | Penrith City Council provided feedback to audit consultation indicating inadequate consultation had been undertaken by PLM in relation to traffic safety measures on the corner of Phillip Street and Access Road A. Upon examination of all evidence the auditor agrees that communication channels in relation to traffic management and consultation with PCC should be improved. | Devise and implement improvements to PLM internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council, including obtaining approval for the erection of No Stopping signage on Council roads. | SSTOM (PLM) | OPEN   | PLM will continue to better use established TTLG and TCG forums for consultation purposes with Council should future needs arise.                                                                                                                                                                                                                                                                          |
| IA4 – OBS 2<br>Morasey Environment | E107 | Observation                    | Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for the road. A copy of the Road Dilapidation Report must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.                                                                                        | The Land Surveys Orchard Hills Road Condition Report dated 21/3/2025 was submitted to PCC on 26/5/25, more than 3 weeks after the survey was completed.                                                                                                                                                                                                                              | Nil                                                                                                                                                                                                                                                         | N/A         | N/A    | N/A                                                                                                                                                                                                                                                                                                                                                                                                        |
| IA4 – OBS 3<br>Morasey Environment | E133 | Observation                    | Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.                                                                                                                                                                                                                           | A reference to compliance with Condition E133 could not be found in Groundwater the CMRs.                                                                                                                                                                                                                                                                                            | Consider including reference to Condition E133 in the next Groundwater CMR.                                                                                                                                                                                 | SSTOM (PLM) | OPEN   | Only two registered groundwater users were identified for the project, located near Patons Lane. The project design includes only above-ground infrastructure in this area and no groundwater level or quality impacts are expected as a result of project activities. This is outlined in section 3.2.1.1 of the Groundwater Monitoring Program and reference within the CMR is not considered necessary. |
| IA4 – OBS 4<br>Morasey Environment | E134 | Observation                    | The Proponent must submit a revised Groundwater Modelling Report to the Planning Secretary for information before bulk excavation at the relevant construction location. The Groundwater Modelling Report must include:                                                                                                                                                                                                                                                                                                    | A reference to compliance with Condition E134 could not be found in Groundwater the CMRs.                                                                                                                                                                                                                                                                                            | Consider including reference to Condition E134 in the next Groundwater CMR.                                                                                                                                                                                 | SSTOM (PLM) | OPEN   | PLM commit to including reference to Condition E134 in the next Groundwater CMR.                                                                                                                                                                                                                                                                                                                           |

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|             |     |                                | <ul style="list-style-type: none"> <li>a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI;</li> <li>b) predicted incidental including cumulative project effects;</li> <li>c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects;</li> <li>d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI;</li> <li>e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and</li> <li>f) a schematic of the conceptual hydrogeological model.</li> </ul> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                              |           |                     |                                                                                                                                                                                                                                           |
| IA8 – NC01  | A2  | Non-Compliance (self-Reported) | The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>There was one notification of Non-Compliance (NC) submitted to DPHI for FSM during the audit period. The Non-Compliance was with project Out of Hours Work Application commitments. While gathering evidence for the upcoming Environmental Independent Audit, it was discovered that the vibration monitor at St Marys station had been powered off since 06/04/2025. During the period 6/4/25–1/8/25, Out of Hours Work (OOHW) applications indicated that vibration monitoring would be undertaken as a precaution, despite no sensitive receptors being within the minimum working distances. Notification of the NC to DPHI was submitted on 1/8/2025, within the required 7-day timeframe.</b> | The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally. | FAW (FSM) | CLOSED              | N/A                                                                                                                                                                                                                                       |
| IA8 – OBS 1 | C10 | Observation                    | The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a Staging Report must be prepared. The Staging Report must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any CEMP or CEMP sub plan for the first of the proposed stages of construction (or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Section 3.2.5 of the Sydney Metro WSA Staging Report Rev11 states "The FAW (Finishing Auxiliary Works) stage is still being developed at the time of this report. In accordance with CoA A14, the Staging Report will be revised to include detail on the FAW stage when this information is available. The revised Staging Report will be submitted to the Planning Secretary for information prior to commencement of the FAW stage". The Staging Report</b>                                                                                                                                                                                                                                       | Update the Staging Report to include detail on the FAW stage when this information is available.                             | FAW (FSM) | OPEN (Due Feb 2026) | The Staging Report is currently being revised by Sydney Metro-WSA to include the FAW stage, including the transfer of the FSM package of works from AEW to FAW for management noting all other AEW packages of works have been completed. |

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|  |  |  | if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation), unless otherwise agreed with the Planning Secretary. | remained under review at the time of IA8 and detail on the FAW stage had not been documented. |  |  |  |  |
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