

SM – WSA CSSI 10051

Sydney Metro Response to Combined Independent Environmental Audit No.9 Findings

Item	Ref	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ² & Due Date	Sydney Metro Response
NON-COMPLIANCES								
IA3 – NC01	C10	Non-Compliance	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.	There was no tree protection zone (TPZ) established around one of the trees in Laydown 1. The SM-WSA FSM Biodiversity ERAP requires: "Construction of fencing or any physical barrier between installation areas and the vegetation to be installed where required".	Establish a TPZ around the affected tree in Laydown 1 in accordance with the Biodiversity ERAP.	FSM (LORAC)	OPEN Due Date: immediately	Tree protection zone has been re-instated in Laydown 1 in accordance with the Biodiversity ERAP. Evidence has been provided to the Auditor on 18/03/25.
IA3-NC02	E109	Non-Compliance	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to: (a) minimise parking on public roads; (b) minimise idling and queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.	The CTPMP, Section 3.4 Worker parking states "All workers will be instructed to use public/active transport and not utilise the TfNSW commuter carpark and on-street parking along Harris Street and other surrounding streets. Laing O'Rourke would take appropriate action if informed of this activity occurring". During the audit site inspection, worker vehicles were observed to be parked in a flagged off area on Harris Street outside of the 32 Harris Street compound. The CTPMP, Section 3.5 On-Street Works Zone states "All construction activities will be contained within the TAP 3 compound. An on-street works zone would not be required for the construction-related works. Should a works zone be required, a separate application will be made to the Council to organise appropriate approvals for the proposed works zone prior to the start of works, as well as the parking and traffic changes". Approval for worker parking outside the Harris Street compound observed during the audit site inspection on 18/2/2026 was requested but not provided as evidence.	Obtain Council approval (e.g. works zone approval) for worker parking during normal working hours on Harris Street outside the 32 Harris Street site compound. Alternatively, remove the flagged off worker parking area and instruct workers no project parking is allowed in this area. Review and update the CTPMP and Construction Worker Parking Strategy to reflect the actual worker parking available and approved.	FSM (LORAC)	OPEN Due Date: immediately	The flagging has been removed, and the workers have been instructed not to park in this area. LOR are working to update the CTMP accordingly to accurately reflect the actual worker parking available. LOR have made an agreement with Sydney Metro and are now permitted to park at the Harris st Car park. LOR will also seek to apply for a Work zone permit for the space in front of the site compound (as required). Evidence has been provided to the Auditor on 18/03/25.
IA5-NC01	A44	Non-Compliance	The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance with the terms of this approval.	NCR 015 was notified to the Planning Secretary outside of the required 7-day timeframe. NCR 015 was identified on 2/12/2025 and notified to the Planning Secretary on 16/12/2025 (14 Days).	Ensure future NCs are notified in writing to the Planning Secretary within the timeframe required by Condition A44.	SSTOM (PLM)	OPEN Due Date: Ongoing. To be verified during IA6.	Sydney Metro will ensure as the Proponent that all non-compliance reports are submitted as per A45.

¹ 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)

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

IA5-NC02	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.	NCR 015 (2/12/2025): Condition C10 BRD A concrete washout overflow occurred in two locations and concrete slurry flowed to the edge of the bund. The incident occurred due to a lack of capacity and a delay during a tunnel pour which meant the concrete in waiting trucks needed to be disposed as slump requirements would not be met. The spill was cleaned up and additional washout trays provided to prevent overflow. PLM advised frequent checks of washout capacity will be carried out by both the Linewidth and Station Supervisors when undertaking concrete works. Concrete wash outs are discussed at each morning's toolbox talks and the issue has been escalated project-wide with all Supervisors, Engineers, Superintendents, and concrete provider Boral aware of the management requirements associated with waste concrete. Notification of the NC to DPHI was on 16/2/2025, outside of the required 7-day timeframe.	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed out internally.	SSTOM (PLM)	CLOSED Due Date: N/A	N/A
IA5-NC03	C10			NCR 016 (11/12/2025): Condition C10 The replacement of deteriorated banner mesh around PLM ancillary facilities was not completed within a practicable timeframe. Photos of newly installed banner mesh at CLM, LDN and OHE were presented during the audit. Notification of the NC to DPHI was on 17/12/2025, within the required 7-day timeframe.	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed out internally.	SSTOM (PLM)	CLOSED Due Date: N/A	N/A
IA5-NC04	E38	Non-Compliance (self-reported)	Work must only be undertaken during the following 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.	NCR 014 (21/9/2025): Condition E38 SMF. PLM received two separate complaints on Sunday 21/9/2025 at 09:20am and 10:00am with regards to works occurring at the SMF. A front-end loader was rail pulling within the SMF outside standard construction hours and without an approved OOH permit. Upon investigation it was found the activity occurred from 6:52am to 10:04am. Notification of the NC to DPHI was on 29/9/2025, outside of the required 7-day timeframe. PLM delivered a toolbox to the SMF team on compliance obligations around construction hours, and OOH permits at the next pre-start meeting.	Continue to regularly communicate allowable working hours and educate the site team on circumstances under which an out of hours work approval is required.	SSTOM (PLM)	OPEN Due Date: Ongoing. To be verified during IA6.	PLM will continue to ensure the construction workforce are continually communicated to in regard to standard working hours as well as approved out of works across the project.
IA5-NC05	E109	Non-Compliance (self-reported)	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to: (a) minimise parking on public roads; (b) minimise idling and queuing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive	NCR 017 (15/12/2025): Condition E109 STM. Construction Worker Car Parking Strategy – St Marys Station. Notification of the NC to DPHI was on 19/12/2025, within the required 7-day timeframe.	No alternate parking locations for St Mary's station workers have been identified to date. It is recommended that further investigation into alternate parking locations is undertaken to reduce the risk of a long-term NC with Condition E109. Ongoing consultation with PCC is also recommended to help	SSTOM (PLM)	OPEN Due Date: Ongoing. To be verified during IA6.	A revised Construction Worker Car Parking Strategy – St Marys Station is currently with PCC for consultation. Post feedback from Council, the finalised strategy will be provided to DPHI as requested.

			land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.		ensure a suitable solution to worker parking issues is achieved.			
OBSERVATIONS								
IA3 – OBS 1	A46	Observation	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	A spoil truck parked outside Laydown 1 off Forrester Road waiting did not have the SM-WSA project marked on its side or rear. Signage for three other projects was marked on the vehicle.	Ensure all heavy vehicles used for spoil haulage are clearly marked on the sides and rear with the project name and application number.	FSM (LORAC)	OPEN Due Date: Immediately	Spoil haulage vehicles are clearly marked. Evidence has been provided to the Auditor on 18/03/25.
IA3 – OBS 2	C10	Observation	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.	Litter was observed overflowing from skip bins and around the site compound.	Clean up litter from the compound and ensure bins are emptied regularly, i.e. before they begin to overflow.	FSM (LORAC)	OPEN Due Date: Within 5 Days	Compound has been tidied, with all litter removed from site, and skip bins have been emptied and will continue to be emptied prior to them overflowing. Evidence has been provided to the Auditor on 18/03/25
IA3 – OBS 3	C13	Observation	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as required by Condition A6) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why.	Reference to Table 4-1 in Appendix B of the SM-WSA Staging Report Rev 12, 11/12/2025 should be updated to Table 4-3 to reference the new table prepared to set out the applicability of requirements relating to CEMP environmental management categories - FAW, rather than the superseded AEW).	Update the Staging Report accordingly.	Sydney Metro	OPEN Due Date: Next review	Sydney Metro will update the Staging Report to amend the incorrect reference.
IA3 – OBS 4	E128	Observation	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	Excavation for CSR works was occurring in the northern plaza. ERSED controls were missing from one end of the diversion pipe under the access and were deteriorated around the stormwater inlet. Wheelie bins and bollards were stored on top of the stormwater grate. Given the amount of disturbed material located in the works area, the controls would not be deemed effective in reducing the risk of sediment entry to stormwater during a rain event. It is noted there was no rain at the time of the inspection.	Remove bins and bollards from the stormwater grate. Refresh ERSED controls in the vicinity and replace missing controls to reduce the risk of sediment entry to stormwater during the next rain event.	FSM (LORAC)	OPEN Due Date: Within 24 Hours or prior to the next rain event, whichever is sooner.	Bins and bollards from the stormwater grate has been removed and the ERSED controls have been refreshed. Evidence has been provided to the Auditor on 18/03/25.
IA5-OBS1	E1	Observation	All reasonably practicable measures must be implemented to minimise the emission of dust and other air	Wheel washes consisting of a depression in the ground filled with water were in use at the SMF. The	The use of this type of wheel wash should be monitored to ensure the dirty water is contained in a closed	SSTOM (PLM)	OPEN	PLM monitor all controls during weekly environmental inspections and will continue to monitor the wheel wash to

			pollutants during construction.	water inside the pits was muddy/dirty which increases the risk of mud and sediment tracking onto public roads. It is noted that there was no overflow observed and the water appeared to be mostly contained.	system; Water is periodically removed and disposed of properly; and that there is no discharge to stormwater drains or waterways.		Due Date: Ongoing. To be verified during IA6.	ensure the dirty water is contained in a closed system; water is periodically removed and disposed of properly; and that there is no discharge to stormwater drains or waterways.
IA5-OBS2	E2	Observation	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	A formal record of pre-clearance inspections undertaken for each site (i.e. Portion 1 Blaxland Creek, Cosgrove Creek and Portion 3 South of Patons Lane) was not documented within or attached to the WolfPeak Post-clearance inspection report. The WolfPeak Post-clearance inspection report states tree clearing commenced on 2/12/2026, where the Tree Removal Permit for Cosgrove Creek was issued on 3/12/2026, after the stated commencement of clearing.	Update the Post-clearance Report for Portion 1 Blaxland Creek, Cosgrove Creek and Portion 3 South of Patons Lane, dated 5/1/2026 to accurately reflect the timing of pre-clearance inspections and tree removal works for each site, to confirm that pre-clearance inspections were undertaken within 48 hours of tree removal commencing. Conduct a review of all pre- and post- clearance reports to ensure the required information has been documented including: Date of the pre-clearance inspection & findings; Record of tree removal permit; Date of tree removal; Date of the post clearance inspection and findings.	SSTOM (PLM)	OPEN Due Date: Ongoing. To be verified during IA6.	PLM provided evidence to the auditor on 19/03/2026 confirming that pre-clearance inspections were undertaken prior to clearing activities and will update the post-clearing report to accurately reflect the timing of pre-clearance inspections and tree removal works for each site. PLM will ensure all future reports include required details.
IA5-OBS3	E123	Observation	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI or be done in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.	The Material Import Registers don't specify the source location of the import material. While the source location is noted in other columns, e.g. Luddenham Operations & Sydney Metro West, the source of the topsoil imported to the SMF can't be determined from the Material Import Registers alone.	Update the Material Import Register to specify the source location of all material imported to site, including topsoil.	SSTOM (PLM)	OPEN Due Date: Ongoing. To be verified during IA6.	Source locations are linked through reference of waste classification within the register. PLM Material Tracking registers will be updated to include source locations.
IA5-OBS4	E127	Observation	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	The ESCP for Cosgrove Creek is difficult to read. The waterway itself is not well defined and the aerial imagery in the background doesn't provide an accurate reflection of site conditions including: creek banks, existing vegetation and areas of vegetation removed. The ESCP shows silt curtains are required on either side of the creek but were not in place during the site inspection. A hydrocarbon boom was in place during the site inspection (and required as part of the EWMS) but is not illustrated on the ESCP. Geofabric lining was in place over the piling pad side of the creek bank during the inspection but was not reflected on the ESCP.	Review the Cosgrove Creek ESCP and update to reflect the requirements of the EWMS; ensure controls are placed in the correct location. A clearer aerial image as background may be helpful in illustrating the location and type of required controls.	SSTOM (PLM)	OPEN Due Date: Within 5 days – 29/03/2026	Sydney Metro WSA - SSTOM – Linewide - Portion 3 - Luddenham Road South to Elizabeth Drive Erosion and Sediment Control Plan SMWSASSM-PLD-SWD-SW000-EV-PLN-000001 Rev 3 dated 25/03/2026 has been provided to the Auditor on 27/03/2026.