



# Construction Environmental Management Plan (CEMP)

**Project Name:** Parramatta Light Rail Stage 2 Enabling Works

**Contract Number:** PD-22-12894

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## Document Control

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## Document History and Status

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## John Holland Approval Record

Rev	Function	Position	Name	Signature	Date
<b>1</b>	<b>Approved By</b>	Environment Manager			28/02/2025
<b>1</b>	<b>Authorised By</b>	Project Director			28/02/2025





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## List of emergency and key contacts

Position / Organisation	Name	Phone
EPA pollution hotline	n/a	131 555
Fire and Rescue NSW	n/a	000 (for pollution incidents that present an immediate threat to human health or property) 1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
SafeWork NSW	n/a	131 050
NSW Health – Western Sydney Local Health District	n/a	(02) 9840 3000
City of Parramatta Council		1300 617 058 or 02 9806 5050
City of Ryde Council		(02) 9952 8222
Parramatta Light Rail – Community Information Line	n/a	1800 139 389
WIRES	-	1300 094 737
TfNSW Project Director	[REDACTED]	[REDACTED]
TfNSW Project Manager (North)	[REDACTED]	[REDACTED]
TfNSW Project Manager (South)	[REDACTED]	[REDACTED]
TfNSW Senior Environment and Sustainability Manager	[REDACTED]	[REDACTED]
TfNSW Environmental and Sustainability Manager	[REDACTED]	[REDACTED]
TfNSW Communications Manager	[REDACTED]	[REDACTED]
TfNSW Safety Manger	[REDACTED]	[REDACTED]
John Holland Project Director	[REDACTED]	[REDACTED]
John Holland General Superintendent	[REDACTED]	[REDACTED]
John Holland Construction Manager	[REDACTED]	[REDACTED]
John Holland Environment and Sustainability Manager	[REDACTED]	[REDACTED]
John Holland Stakeholder and Communications Manager	[REDACTED]	[REDACTED]
John Holland Safety Manager	[REDACTED]	[REDACTED]
Environmental Representative	[REDACTED]	[REDACTED]
Acoustics Advisor	[REDACTED]	[REDACTED]
Acoustics Advisor (site contact)	[REDACTED]	[REDACTED]
Independent Arborist	[REDACTED]	[REDACTED]





## Definitions

Term	Meaning
<b>AA</b>	Acoustics Advisor
<b>Aboriginal object</b>	The same meaning as in the <i>National Parks and Wildlife Act 1974</i> (NSW)
<b>AFG</b>	Aboriginal Focus Group
<b>AG DCCEW</b>	Australian Government Department of Climate Change, Energy, the Environment and Water
<b>AQMP</b>	Construction Air Quality Management Sub-plan
<b>BCS</b>	Biodiversity Conservation and Science group of the NSW Department of Climate Change, Energy, the Environment and Water
<b>CALD</b>	Culturally and Linguistically Diverse
<b>CCS</b>	Community Communication Strategy
<b>CCTV</b>	Closed-circuit television
<b>CEMF</b>	Construction Environmental Management Framework
<b>CEMP</b>	Construction Environmental Management Plan
<b>CEP</b>	Communications and Engagement Plan
<b>CLM Act</b>	<i>Contaminated Land Management Act 1997</i>
<b>CNVIS</b>	Construction Noise and Vibration Impact Statement
<b>CNVS</b>	Construction Noise and Vibration Strategy (TfNSW, 2019)
<b>Construction</b>	Includes Work required to construct the CSSI as defined in the Project Description described in the documents listed in Condition A1 including commissioning trials of equipment and temporary use of any part of the CSSI, but excluding Low Impact Work which is carried out or completed prior to approval of the CEMP and work approved under a Site Establishment Management Plan
<b>CSSI</b>	Critical State Significant Infrastructure
<b>CTTAMP</b>	Construction Traffic, Transport and Access Management Sub-plan
<b>Department</b>	Department of Planning, Housing and Infrastructure
<b>DPHI</b>	Department of Planning, Housing and Infrastructure
<b>DPIRD Fisheries</b>	NSW Department of Primary Industries and Regional Development – Fisheries
<b>DRP</b>	Design Review Panel
<b>ECM</b>	Environmental Control Map
<b>EIS</b>	Environmental Impact Statement Parramatta Light Rail Stage 2
<b>Emergency Services</b>	NSW Police, NSW Ambulance, Fire and Rescue NSW, NSW Rural Fire Services and NSW State Emergency Service
<b>Environmental Assessment Documentation</b>	The set of documents that comprise the Division 5.2 Approval: <ul style="list-style-type: none"> <li>• Transport for NSW (November, 2022), Environmental Impact Statement (EIS)</li> <li>• Transport for NSW (October, 2023) Response to Submissions Report (Submissions Report)</li> <li>• Transport for NSW (October, 2023) Amendment Report (AR)</li> </ul>



Term	Meaning
	<p>The documents that comprise the EPBC Act referral:</p> <ul style="list-style-type: none"> <li>Referral 2022/09300, to construct approximately 10 km long dual-track light rail line to connect Stage 1 of the Parramatta Light Rail network to Sydney Olympic Park, in NSW</li> <li>Notification of referral decision and designated proponent - controlled action; date of decision 30 September 2022; ID: 2022/09300</li> </ul>
<b>Environmental aspect</b>	Defined by AS/NZS ISO 14001:2016 as an element of an organisation's activities, products or services that can interact with the environment
<b>Environmental impact</b>	Defined by AS/NZS ISO 14001:2016 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects
<b>Environmental objective</b>	Defined by AS/NZS ISO 14001:2016 as an overall environmental goal, consistent with the environment policy, that an organisation sets itself to achieve
<b>Environmental target</b>	Defined by AS/NZS ISO 14001:2016 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives
<b>Environmental Representative (ER)</b>	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. A key point of contact for the Planning Secretary in relation to environmental performance of the CSSI.
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>EPA</b>	NSW Environment Protection Authority
<b>EPBC Act</b>	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
<b>EPBC CoA</b>	Condition of Approval of the Parramatta Light Rail Stage 2 Environmental Planning and Biodiversity Conservation Act 1999 (EPBC) 2022/09300
<b>EPL</b>	Environment Protection Licence
<b>ESMS</b>	Environment and Sustainability Management System
<b>EWMS</b>	Environmental Work Method Statement
<b>FFMP</b>	Construction Flora and Fauna Management Sub-plan
<b>GPOP</b>	Greater Parramatta and Olympic Peninsula
<b>Heritage item</b>	A place, building, work, relic, archaeological site, tree, movable object or precinct of heritage significance, that is listed under one or more of the following registers: the State Heritage Register under the Heritage Act 1977 (NSW), a state agency heritage and conservation register under section 170 of the Heritage Act 1977 (NSW), a Local Environmental Plan under the EP&A Act, the World, National or Commonwealth Heritage lists under the Environment Protection and Biodiversity Conservation Act 1999 (Cth), and an "Aboriginal object" or "Aboriginal place" as defined in section 5 of the National Parks and Wildlife Act 1974 (NSW)
<b>HMP</b>	Construction Heritage Management Sub-plan
<b>HNIW</b>	Highly Noise Intensive Works
<b>IC</b>	Independent Certifier
<b>IMS</b>	Integrated Management System
<b>Infrastructure Approval</b>	State Significant Infrastructure (SSI) 10035 Parramatta Light Rail Stage 2, determined on 22 February 2024





Term	Meaning
<b>ISC</b>	Infrastructure Sustainability Council
<b>LALC</b>	Local Aboriginal Land Council
<b>LOTE</b>	Language Other than English
<b>MWNMP</b>	Construction Maritime Works and Navigation Management Sub-plan
<b>Non-compliance</b>	An occurrence, set of circumstances or development that is a breach of the Infrastructure Approval. A non-compliance also includes failure to implement the CEMP and CEMP Sub Plans.
<b>NPWS</b>	NSW National Parks and Wildlife Service, within the NSW Department of Climate Change, Energy, the Environment and Water
<b>NSW CoA</b>	Condition of Approval of the State Significant Infrastructure (SSI) 10035 Parramatta Light Rail Stage 2
<b>NSW DCCEEW – Water Group</b>	Water Group of the NSW Department of Climate Change, Energy, the Environment and Water
<b>NVMP</b>	Construction Noise and Vibration Management Sub-plan
<b>OOHW</b>	Out-of-hours work
<b>PDCA</b>	Plan-Do-Check-Act
<b>PDLP</b>	Place, Design and Landscape Plan
<b>PIN</b>	Penalty Infringement Notice
<b>Planning Secretary</b>	Planning Secretary of the DPHI (or nominee, whether nominated before or after the date on which the Infrastructure Approval was granted)
<b>PLR</b>	Parramatta Light Rail
<b>PLR Stage 2</b>	Parramatta Light Rail Stage 2
<b>PLR2 – EW</b>	Parramatta Light Rail Stage 2 – Enabling Works
<b>POEO Act</b>	<i>Protection of the Environment Operations Act 1997</i>
<b>Project, the</b>	Parramatta Light Rail Stage 2 – Enabling Works
<b>RAPs</b>	Registered Aboriginal Parties
<b>Relevant Councils</b>	City of Parramatta Council and City of Ryde Council
<b>SIMP</b>	Social Impact Management Plan
<b>Site Auditor</b>	A contaminated land auditor, accredited by the NSW EPA under the CLM Act
<b>SMART</b>	Specific, Measurable, Achievable, Realistic and Timely
<b>SOPA</b>	Sydney Olympic Park Authority
<b>SPR</b>	Scope and Performance Requirements
<b>SSI</b>	State Significant Infrastructure
<b>Submissions Report</b>	Response to Submissions Report Parramatta Light Rail Stage 2
<b>SWMP</b>	Construction Soil and Water Management Sub-plan





Term	Meaning
<b>TfNSW</b>	Transport for NSW (the proponent)
<b>UMM</b>	Updated Mitigation Measures
<b>WMP</b>	Construction Waste Management Sub-plan
<b>Work</b>	Any physical activity for the purpose of the CSSI including Construction and Low Impact Work





# 1. Introduction

## 1.1. Context

Transport for New South Wales (TfNSW) have engaged John Holland to design and construct the Parramatta Light Rail Stage 2 Enabling Works (PLR2 – EW or the ‘Project’) as part of the Stage 2 extension of the Parramatta Light Rail network (PLR Stage 2).

This Construction Environmental Management Sub-plan (CEMP or Plan) is the overarching governance document for the Environmental and Sustainability Management System (ESMS) and describes how John Holland will minimise and manage environmental and community impacts of construction during the delivery of the PLR2 – EW.

This Plan has been prepared to address the requirements of:

- State Significant Infrastructure (SSI) 10035 Parramatta Light Rail Stage 2, determined on 22 February 2024 (Infrastructure Approval), including Conditions of Approval (NSW CoA)
- Parramatta Light Rail Stage 2 *Environmental Planning and Biodiversity Conservation Act 1999* (EPBC) 2022/09300 approved September 2022, including Conditions of Approval (EPBC CoA)
- Parramatta Light Rail Stage 2 – Project Staging Report (TfNSW, November 2024)
- Parramatta Light Rail Stage 2 – Construction Environmental Management Framework (TfNSW, November 2024) (CEMF)
- Environmental Impact Statement (EIS), Response to Submissions Report (Submissions Report), and Amendment Report, including the Updated Mitigation Measures (UMMs) (collectively referred to as Environmental Assessment Documentation)
- Contractual requirements, including the PLR2 – EW Project Deed and TfNSW Specifications
- Applicable legislation.

## 1.2. Background

### 1.2.1. Parramatta Light Rail – Stage 2

Parramatta Light Rail (PLR) will deliver an integrated light rail service that supports the population and employment growth expected throughout the Greater Parramatta and Olympic Peninsula (GPOP). It will integrate with existing and future modes of transport including buses, trains, ferries and active transport (pedestrian and cycle networks), as well as Sydney Metro services and the road network.

PLR Stage 2 will connect the Parramatta CBD and Stage 1 to Camellia, Rydalmere, Ermington, Melrose Park, Wentworth Point, Sydney Olympic Park and the Carter Street precinct in Lidcombe. The PLR Stage 2 project comprises two main elements:

- Construction of about 10 kilometres of light rail infrastructure between Camellia and the Carter Street precinct adjacent to Sydney Olympic Park
- Operation of about 13 kilometres of light rail alignment between the Parramatta CBD and the Carter Street precinct, including a section of infrastructure constructed by PLR Stage 1 between Camellia and the Parramatta CBD.

A detailed description of PLR Stage 2 is provided in Section 2.2.

### 1.2.2. Statutory context

PLR Stage 2 is subject to an approval under Division 5.2 the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) as critical State significant infrastructure (CSSI) (SSI-10035). PLR Stage 2 is also a controlled action under Section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), requiring a separate approval from the Australian Government.

An Environmental Impact Statement (EIS) was prepared to describe and assess the environmental impacts associated with PLR Stage 2 and provide mitigation measures to address the identified







impacts. The EIS was exhibited by the Planning Secretary from 9 November 2022 to 16 December 2022 to give the community and stakeholders the opportunity to provide comment.

In accordance with Section 5.17 of the EP&A Act, the Planning Secretary requested TfNSW to provide a Response to Submissions Report (Submissions Report) on 21 December 2022. The issues raised during the public exhibition were addressed within the Submissions Report. Following the exhibition of the EIS, TfNSW refined the reference design and a number of amendments were proposed. A separate Amendment Report was prepared to describe and assess the potential impacts of the proposed amendments and to identify how those impacts would be managed and mitigated. UMMs are nominated in the Amendment Report to manage the identified impacts.

PLR Stage 2 must be carried out generally in accordance with the Environmental Assessment Documentation to satisfy NSW CoA A1. PLR Stage 2 must also be carried out in accordance with all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the Environmental Assessment Documentation to satisfy NSW CoA A2.

The Planning Secretary granted approval for PLR Stage 2 on 22 February 2024 (SSI-10035). The Infrastructure Approval and Environmental Assessment Documentation are available on the Planning Secretary's major projects website:

<https://www.planningportal.nsw.gov.au/major-projects/projects/parramatta-light-rail-stage-2>

Due to the potential for PLR Stage 2 to impact on three matters of national environmental significance (Commonwealth-listed threatened species and ecological communities), PLR Stage 2 was determined to be a controlled action, which requires assessment and approval under the EPBC Act. The NSW Government confirmed the action will be assessed under the Assessment Bilateral Agreement (as amended in 2020) between the Australian and NSW governments. However, approval was required from the Australian Government Minister for the Environment and Water.

Approval for PLR Stage 2 under the EPBC Act was granted by the Australian Government on 19 April 2024 (EPBC 2022/09300). The Federal approval is available on the EPBC Public Portal at:

<https://epbcpbpublicportal.environment.gov.au/all-referrals/project-referral-summary/?id=a215cb2e-f2fc-ec11-82e5-0022481543c7>

PLR Stage 2 must be carried out in accordance with the terms of the NSW and Federal Approvals.

### 1.2.3. PLR Stage 2 delivery strategy

Construction of PLR Stage 2 will be staged to align with TfNSW's procurement and delivery strategy, and to achieve construction completion in the minimum, practically reasonable time, while managing community and environmental impacts using suitably qualified and experienced contractors for specialised components. PLR Stage 2 will be constructed in two stages:

- PLR Stage 2A – Bridge between Melrose Park and Wentworth Point (PLR2 – EW)
- PLR Stage 2B – Main alignment construction works and supply, operate and maintain system works.

Each package of work is to be delivered under separate contracts on behalf of the proponent (TfNSW). While the Stages will commence at different times under separate construction approvals, there may be periods during which the works will overlap. Details on the management of cumulative impacts, including between the other PLR Stage 2 works is provided in Section 2.5.

### 1.2.4. Stage A – Enabling Works

John Holland has been engaged to deliver Stage A (PLR2 – EW) as part of PLR Stage 2. The PLR2 – EW includes the delivery of a public and active transport bridge across the Parramatta River and approaches between Wentworth Point and Melrose Park. The bridge over the Parramatta River requires a 320 metre span over a bend in the Parramatta River to clear environmentally sensitive mangroves and provide underpass access for road and active transport to established recreational facilities, including the Ermington Boat Ramp.

A detailed description of PLR2 – EW is provided in Section 2.4.





### 1.2.5. Construction Environmental Management Framework

To facilitate the preparation and approval of CEMPs, Sub-plans and Construction Monitoring Programs prior to and during the construction phase of PLR Stage 2, TfNSW have developed a Construction Environmental Management Framework (CEMF) in accordance with NSW CoA C1.

The CEMF includes a guide to the general environmental, stakeholder and community management requirements which will be implemented during construction and provides a road map for the development and approval of environmental management documentation.

In particular, the CEMF:

- Identifies the CEMPs, Sub-plans and Construction Monitoring Programs required for each stage of construction
- Documents the proposed structure of the environmental management documentation
- Provides a risk assessment of the predicted level of environmental and social risk posed by each construction stage
- Nominates the consultation and endorsement level for the listed plans for each construction stage.

In accordance with NSW CoA C2, the approved CEMF will be implemented for the duration of construction. This CEMP and Sub-plans have been prepared in accordance with relevant requirements of the CEMF.

### 1.3. Purpose of this CEMP

The purpose of this Construction Environmental Management Plan (CEMP or Plan) and associated Sub-plans and Construction Monitoring Programs is to describe how John Holland will manage potential environmental and community impacts during construction of the PLR2 – EW.

This Plan has been prepared under and consistent with the CEMF, to outline and describe how the Planning Secretary's CoA (NSW CoA) and the Federal Minister for the Environment and Water's CoA (EPBC CoA) will be complied with during construction of PLR2 – EW. The CEMP outlines how all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the Environmental Assessment Documentation, including the UMMs, will be complied with.

This CEMP is consistent with:

- The CEMF
- NSW Minister's Infrastructure Approval dated 22 February 2024 (SSI-10035)
- Federal Minister's Approval dated 19 April 2024 (EPBC 2022/09300)
- Environmental Assessment Documentation
- TfNSW Guidelines
- Environmental Management Plan Guideline – Guideline for Infrastructure Projects (DPIE, 2020)
- AS/NZS ISO 14001: Environmental Management Systems (EMS)
- ISO 9001: Quality Management Systems
- ISO 45001: Safety Management Systems.

This CEMP provides a structured approach to the management and minimisation of environmental risks and issues during construction of the PLR2 – EW. This Plan is the overarching document in the Environment and Sustainability Management System (ESMS) for the PLR2 – EW, and includes a number of Sub-plans, monitoring programs, protocols and procedures, developed to outline the requirements, controls and management methods that will be implemented during construction.

The CEMP and associated Sub-plans must be consistent with the CEMF and be endorsed by the Environmental Representative (ER) and approved by the Planning Secretary (as relevant), prior to the commencement of construction of the PLR2 – EW.







## 1.4. Conditions of Approval and UMMs

This CEMP provides a consistent approach to address the requirements of both the NSW and Federal approvals in a single document. The requirements of the NSW CoA relevant to the development of this CEMP are shown in Table 1. These are defined as primary NSW CoA and specifically relate to the development of the CEMP. Secondary NSW CoA relevant to, but not specific to the development of this Plan, have been listed in Appendix A1. A cross reference is also included to indicate where the NSW CoA is addressed in this Plan or other Project management document.

In the event of an inconsistency between the terms of the Infrastructure Approval, the Environmental Assessment Documentation or the Project Staging Report, the terms of the Infrastructure Approval will prevail to the extent of the inconsistency; and any document listed in Environmental Assessment Documentation, the most recent document will prevail to the extent of the inconsistency. Where there are differing interpretations of the NSW CoA, the Planning Secretary's interpretation is final.

Any document required by the Infrastructure Approval which requires the Planning Secretary's approval, will be approved by the Planning Secretary before the commencement of work associated with that document. Any document required to be prepared by the Infrastructure Approval, will be implemented unless otherwise agreed by the Planning Secretary.

Requirements of the EPBC CoA and where they are met in this CEMP is shown in Table 2. A cross reference is also included to indicate where the EPBC CoA is addressed in this Plan or other Project management documents. A full list of the EPBC CoA and how they have been addressed is provided in the Construction Flora and Fauna Management Plan (Appendix B5).

The primary UMM of relevance to the development of this Plan are listed in Table 3. A cross reference is also included to indicate where the UMM is addressed in this Plan or other Project management documents. Secondary UMM of relevance to this Plan are listed in Appendix A1.



Table 1 – Primary NSW CoA relevant to the CEMP

NSW CoA	Requirement	Plan reference	How addressed
<b>C9</b>	Except as provided by Condition C1, a Construction Environmental Management Plan (CEMP) must be prepared having regard to the <i>Environmental Management Plan Guideline for Infrastructure Projects</i> (Department of Planning, Industry and Environment, 2020).	This Plan Section 1.3	This Plan has been prepared in accordance with the requirements of this condition.
<b>C10</b>	The CEMP must provide:	Section 2.4	A detailed description of PLR2 – EW is provided in Section 2.4.
	(a) a description of activities to be undertaken during construction (including the scheduling of construction);		
	(b) details of environmental and social policies, guidelines and principles to be followed in the construction of the CSSI;	Section 1.7 Section 3.2 Section 3.3 Section 4.2 Appendix A2	The PLR2 – EW Environment Policy (Appendix A2) has been developed consistent with TfNSW's overarching Environment and Sustainability Policy. The Policy provides John Holland's commitment to continual improvement in environmental performance and compliance with applicable legal requirements. Details of how the commitments in the Policy will be achieved is described in Section 3.3. The Sustainability Policy (including social policies) is detailed in Section 1.7. Relevant environmental and social legislation and guidelines applicable to the PLR2 – EW and how they are addressed is provided in Section 4.2.
	(c) a program for ongoing analysis of the key environmental and social impact risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the CSSI. The initial risk assessment may be undertaken as part of the CEMF pursuant to Condition C1;	CEMF Section 1.2.5 Section 4.1	An initial risk assessment for the PLR2 – EW has been undertaken as part of the CEMF developed in accordance with NSW CoA C1 (Section 1.2.5). Details of the ongoing analysis of key environmental and social impact risks arising from PLR2 – EW is provided in Section 4.1.
	(d) details of how the activities described in subsection (a) of this condition will be carried out to:	Section 4.2 Section 4.3	Environmental and sustainability objectives and targets for the PLR2 – EW have been incorporated into this CEMP and Sub-plans. A summary of the environmental and sustainability objectives, targets and key performance indicators relevant to this Plan is provided in Section 4.3. Details of the ongoing
	(i) meet the performance outcomes stated in the documents listed in Condition A1 and as required by this approval; and		





NSW CoA	Requirement	Plan reference	How addressed
	(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition;		analysis of key environmental and social impact risks arising from PLR2 – EW is provided in Section 4.1.
	(e) an inspection program detailing the activities to be inspected and frequency of inspections;	Section 7.1	Details of the inspection regime for PLR2 – EW including by John Holland, the ER, and key agencies and external stakeholders is provided in Section 7.1.
	(f) a protocol for managing and reporting any: (i) incidents; and (ii) non-compliances with this approval or statutory requirements;	Section 6 Section 7.3 Appendix A5	The Environmental Incident Procedure (Appendix A5) (TfNSW, EMF-EM-PR-0001) outlines the procedure to be followed if, during an activity being carried out there is: A report-only event; Non-compliance; Regulatory action received; Environmental incident. The Environmental Incident Procedure sets out the steps for identification; classification; and reporting of report-only events, non-compliances, regulatory action and environmental incidents. The non-compliance procedure is summarised in Section 7.3.
	(g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;	Section 7.3.4	The corrective and preventative actions for rectifying a non-compliance with the Infrastructure Approval once identified is described in Section 7.3.4.
	(h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C14. Where staged construction of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction;	CEMF Project Staging Report Section 3.3	The Project Staging Report and CEMF nominates the NSW CoA and UMMs which are relevant to the PLR2 – EW, and the Sub-plans to be developed. Section 3.3 outlines how these requirements have been addressed by John Holland for the PLR2 – EW.
	(i) an organisational chart including description of the roles and environmental responsibilities for relevant employees and any independent appointments;	Section 5.1	The organisational chart and description of the key roles and responsibilities for relevant personnel and independent appointments for PLR2 – EW is provided in Section 5.1.
	(j) for training and induction for employees, including contractors and sub-contractors, in relation to environmental, social and compliance obligations under the terms of this approval; and	Section 5.3	Details of the site induction, toolbox talks, pre-starts and awareness training as it relates to environmental, social and compliance obligations Section 5.3.





NSW CoA	Requirement	Plan reference	How addressed
	<p>(k) for periodic review and update of the CEMP and all associated plans and programs</p> <p><i>Note: CEMP(s) may reflect the Construction of the CSSI through geographical activities, temporal activities or activity based contracting and staging.</i></p>	<p>Section 1.9</p> <p>Section 7.7</p>	<p>Management reviews of the ESMS, including this Plan as Sub-plans, will be conducted as described in Section 7.7. The process for updating management plan documentation is described in Section 1.9.</p>
<b>C11</b>	CEMP(s) (and relevant CEMP sub-plans) must be submitted to the Planning Secretary for approval except those permitted to be endorsed by others pursuant to a CEMF approved by the Planning Secretary under Condition C1.	CEMF Section 1.8.2	The endorsement and approval process for this Plan, consistent with the approved CEMF, is detailed in Section 1.8.2.
<b>C12</b>	Where a CEMP (and relevant CEMP sub-plans) requires Planning Secretary's approval, the CEMP (and relevant CEMP sub-plans) must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.	Section 1.8.2	The endorsement and approval process for this Plan is detailed in Section 1.8.2.
<b>C13</b>	CEMP(s) (and relevant CEMP sub-plans) not requiring the Planning Secretary's approval, but requiring ER endorsement, must be submitted to the ER no later than one (1) month before the commencement of Construction or where Construction is staged no later than one (1) month before the commencement of that stage. The CEMPs (and relevant CEMP sub-plans) must be endorsed by the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.	Section 1.8.2	The endorsement and approval process for this Plan is detailed in Section 1.8.2.
<b>C14</b>	Except as provided by Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies and council(s) identified for each CEMP Subplan. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant CEMP Sub-plan, including copies of all correspondence from those agencies as required by Condition A12.	Section 1.8.1	<p>This Plan and Sub-plans will be prepared in consultation with the government agencies and council(s) nominated in NSW CoA E14 and relevant UMMs as outlined in Section 1.8.1.</p> <p>Further details of consultation requirements are provided in each of the aspect specific Sub-plans.</p>
	(a) Traffic, Transport and Access - Relevant council(s), relevant road authority, relevant Emergency Services, SOPA	Appendix B1	A Construction Traffic, Transport and Access Management Sub-plan (CTTAMP) has been developed (Appendix B1) to address this NSW CoA and relevant UMMs.
	(b) Maritime works and Navigation - Relevant council(s), Ferry operator, Transport for NSW (maritime operations), SOPA	Appendix B2	A Construction Maritime Works and Navigation Management Sub-plan (MWNMP) has been





NSW CoA	Requirement	Plan reference	How addressed
			developed (Appendix B2) to address this NSW CoA and relevant UMMs.
	(c) Noise and vibration - Relevant council(s), SOPA	Appendix B3	A Construction Noise and Vibration Management Sub-plan (NVMP) has been developed (Appendix B3) to address this NSW CoA and relevant UMMs.
	(d) Heritage (including Aboriginal and non-Aboriginal Heritage) - Relevant council(s), SOPA, LALCs, Heritage NSW, and RAPs	Appendix B4	A Construction Heritage Management Sub-plan (HMP) has been developed (Appendix B4) to address this NSW CoA and relevant UMMs.
	(e) Flora and Fauna - Relevant council(s), AG DCCEEW, DPI Fisheries, NPWS, NSW DCCEEW– Water Group, BCS and SOPA	Appendix B5	A Construction Flora and Fauna Management Sub-plan (FFMP) has been developed (Appendix B5) to address this NSW CoA and relevant UMMs.
	(f) Soil and water - Relevant council(s), NSW DCCEEW– Water Group, DPI Fisheries, SOPA and Heritage NSW  <i>Notes:</i> 1. CEMP Sub-plan(s) may reflect the Construction of the project through geographical activities, temporal activities or activity based contracting and staging. 2. Nothing in this condition prevents the Proponent from combining any of the above CEMP Sub-plans. 3. Where reviewed by an EPA accredited Site Auditor, the Planning Secretary will consider Interim Audit Advice or a Section B Site Audit Statement provided with CEMP sub-plans for approval. 4. Consultation with SOPA is only relevant where there is SOPA affected lands being impacted. 5. The Flora and Fauna CEMP Sub-Plan must be consistent with goals and objectives, mitigation measures and monitoring requirements of the Commonwealth approved conservation advice and any Recovery Plans for all Matters of National Environmental Significance.	Appendix B6	A Construction Soil and Water Management Sub-plan (SWMP) has been developed (Appendix B6) to address this NSW CoA and relevant UMMs.
<b>C16</b>	Construction must not commence until the relevant CEMP(s) and CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMF approved under Condition C1).	Section 1.8.1	Construction of the PLR2 – EW will not commence until the CEMP and Sub-plans have been approved by the Planning Secretary or endorsed by the ER (as per the CEMF).





NSW CoA	Requirement	Plan reference	How addressed
<b>C17</b>	The CEMP(s) and CEMP Sub-plans as approved or endorsed (as relevant), including any minor amendments approved by the ER, must be implemented for the duration of Construction.	Section 1.6	Once approved this CEMP and Sub-plans will be implemented for the duration of the PLR2 – EW.

Table 2 – Primary EPBC CoA relevant to the CEMP

EPBC CoA	Condition	Plan reference	How addressed
<b>15</b>	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Section 7.5	TfNSW will notify the Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW) with the date of commencement of the Action.
<b>16</b>	The approval holder must not commence the Action later than 5 years after the date of this approval decision.	Section 4.2.1	Noted.
<b>17</b>	The approval holder must maintain accurate and complete compliance records.	Section 7.6	John Holland will maintain accurate and complete compliance records for the duration of PLR2 – EW as outlined in Section 7.6.
<b>18</b>	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Section 7.3.3	TfNSW will comply with this condition. John Holland will provide TfNSW with all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connected with a request under this condition.
<b>19</b>	The approval holder must prepare a compliance report for each 12-month period following the date of this approval decision (or as otherwise agreed to in writing by the Minister).	Section 7.3.3	TfNSW will comply with this condition. John Holland will provide TfNSW with all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connected with a request under this condition.
<b>20</b>	Each compliance report must be consistent with the 'Annual Compliance Report Guidelines, Commonwealth of Australia 2023'.	Section 7.3.3	TfNSW will comply with this condition. John Holland will provide TfNSW with all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connected with a request under this condition.







Table 3 – Primary UMMs

UMM	Requirement	Plan reference	How addressed
<b>TT8</b>	<p>A traffic and access management plan will be prepared prior to construction and implemented as part of the CEMP. The plan will detail processes and responsibilities to minimise traffic and access delays and disruptions, and identify and respond to changes to road access and on-street parking arrangements.</p> <p>The plan will include, as appropriate, additional reasonable and feasible measures identified as an outcome of consultation (in accordance with mitigation measure TT12)</p>	Appendix B1	A CTTAMP has been developed (Appendix B1) to address the NSW CoA and this UMM.
<b>TT10</b>	<p>A maritime works and navigation management plan will be prepared prior to construction and implemented as part of the CEMP. The plan will detail processes and responsibilities to manage marine construction vessels and impacts on navigation during construction of the bridges over the Parramatta River.</p> <p>The plan will include, as appropriate, additional reasonable and feasible measures identified as an outcome of consultation (in accordance with mitigation measure TT12).</p>	Appendix B2	A MWNMP has been developed (Appendix B2) to address the NSW CoA and this UMM.
<b>NV5</b>	<p>A noise and vibration management plan will be prepared as part of the CEMP and implemented during construction. The plan will detail processes, responsibilities and measures to manage noise and vibration and minimise the potential for impacts during construction, aligned with the results of community consultation and consistent with the management approach and mitigation measures in the Construction Noise and Vibration Strategy (Transport for NSW, 2019). Measures that mitigate potential noise and vibration at the source will be prioritised.</p>	Appendix B3	A NVMP has been developed (Appendix B3) to address the NSW CoA and this UMM.
<b>AH7</b>	<p>An Aboriginal cultural heritage management plan will be prepared prior to construction and implemented as part of the CEMP. The plan will include measures to minimise the potential for impacts and manage Aboriginal heritage, including:</p> <ul style="list-style-type: none"> <li>• outcomes of further investigations (mitigation measures AH5)</li> <li>• salvage methodology (mitigation measure AH6)</li> <li>• requirements for an induction and cultural awareness training for construction workers and supervisors (mitigation measure AH8)</li> <li>• unexpected finds procedure (mitigation measure AH9)</li> <li>• measures to protect sites from inadvertent impacts from vehicles and equipment.</li> </ul>	Appendix B4	A HMP has been developed (Appendix B4) to address both Aboriginal cultural heritage and Non-Aboriginal heritage requirements, the NSW CoA and this UMM.





UMM	Requirement	Plan reference	How addressed
<b>NAH8</b>	<p>A heritage management plan will be prepared and implemented as part of the CEMP. The plan will include measures to manage non-Aboriginal heritage and minimise the potential for impacts during construction.</p> <p>The plan will be prepared in consultation with relevant heritage agencies (Heritage NSW, Sydney Olympic Park Authority, City of Parramatta Council and City of Ryde Council) and take into account the outcomes of further investigations, including test excavations and the Research Design and Excavation Methodology.</p> <p>The heritage management plan will define a requirement for non-Aboriginal historical heritage awareness training for site workers prior to commencement of construction works. The awareness training will promote an understanding of heritage items that may be impacted during the works.</p>	Appendix B4	A HMP has been developed (Appendix B4) to address both Aboriginal cultural heritage and Non-Aboriginal heritage requirements, the NSW CoA and this UMM.
<b>BD11</b>	<p>A biodiversity management plan will be prepared prior to construction and implemented as part of the CEMP. The plan will include measures to protect biodiversity and minimise the potential for impacts during construction. The plan will include but not be limited to:</p> <ul style="list-style-type: none"> <li>• measures to manage potential impacts on the Green and Golden Bell Frog (see mitigation measure BD12)</li> <li>• measures to manage potential light, noise and vibration impacts on threatened and migratory fauna, such as the Green and Golden Bell Frog, within Sydney Olympic Park</li> <li>• measures to manage biosecurity risks (including pathogens and weeds) in accordance with the Biosecurity Act 2015 (NSW)</li> <li>• locations and requirements for pre-clearing surveys, including where clearing is required within Sydney Olympic Park and areas of mangrove, saltmarsh or other riparian vegetation (see mitigation measure BD13)</li> <li>• an unexpected finds procedure</li> <li>• hygiene controls in relation to chytrid fungus, cinnamon fungus (<i>Phytophthora cinnamomi</i>) and myrtle rust (<i>Pucciniales fungi</i>)</li> <li>• locations and procedures for monitoring (see mitigation measures BD15, BD16 and BD18).</li> </ul> <p>The plan will be developed in accordance with the Biodiversity Guidelines: Protecting and managing biodiversity on RTA projects (Roads and Traffic Authority (RTA), 2011)</p>	Appendix B5	A FFMP has been developed (Appendix B5) to address the NSW CoA and this UMM. In addition, the NVMP has been developed (Appendix B3) which includes measures to manage potential light, noise and vibration impacts on threatened and migratory fauna, such as the Green and Golden Bell Frog, within Sydney Olympic Park.







UMM	Requirement	Plan reference	How addressed
	<p>and the Policy and guidelines for fish habitat conservation and management (update 2013) (DPI, 2013).</p> <p>Management measures, including changes to measures to respond to monitoring outcomes, for works within Sydney Olympic Park and the Millennium Parklands will be developed in consultation with Sydney Olympic Park Authority.</p>		
W9	<p>A soil and water management plan will be prepared as part of the CEMP and implemented during construction. The plan will detail processes, responsibilities and measures to manage potential soil and water quality impacts during construction, including measures to minimise the potential for pollutants to enter surface water and groundwater.</p> <p>The plan will be prepared in accordance with relevant guidelines and standards, including <i>Managing Urban Stormwater-Soils and Construction -Volume 1</i> (Landcom, 2004) and <i>Volume 2D Main Road Construction</i> (DECC, 2008) (the Blue Book), <i>Best Practice Erosion and Sediment Control</i> (International Erosion Control Association (Australasia), 2008), and <i>Sydney Olympic Park Authority Policy-Stormwater Management and Water Sensitive Urban Design</i> (Sydney Olympic Park Authority, 2016) (for works in Sydney Olympic Park).</p>	Appendix B6	A SWMP has been developed (Appendix B6) to address the NSW CoA and this UMM.
HR3	<p>The CEMP will detail incident management and emergency response processes, responsibilities and measures to manage hazards, and incident and emergency situations during construction.</p>	<p>Section 6</p> <p>Section 7.3</p> <p>Appendix A5</p>	<p>The Environmental Incident Procedure (Appendix A5) (TfNSW, EMF-EM-PR-0001) outlines the procedure to be followed if, during an activity being carried out there is: A report-only event; Non-compliance; Regulatory action received; Environmental incident.</p> <p>The Environmental Incident Procedure sets out the steps for identification; classification; and reporting of report-only events, non-compliances, regulatory action and environmental incidents.</p>





UMM	Requirement	Plan reference	How addressed
<b>AQ1</b>	An air quality management plan will be prepared as part of the CEMP and implemented during construction. The plan will detail processes, responsibilities and measures to manage air quality, odour and landfill gas and minimise the potential for impacts during construction. The plan will include an air quality, odour and landfill gas monitoring program, which will be undertaken for the duration of construction.	Appendix B7	A Construction Air Quality Management Plan (AQMP) has been developed (Appendix B7) to address this UMM.
<b>WR3</b>	A waste and resource management plan will be prepared as part of the CEMP and implemented during construction. The plan will adopt the circular economy principles and the waste hierarchy contained in the Waste Avoidance and Resource Recovery Act 2001 and the Infrastructure Sustainability Rating Scheme Technical Manual (Infrastructure Sustainability Council, 2021). It will detail processes, responsibilities and measures to manage waste and resource use, and minimise the potential for impacts during construction.  The plan will include strategies to manage spoil, including preferred reuse options.	Appendix B8	A Waste Management Plan (WMP) has been developed (Appendix B8) to address this UMM.





## 1.5. Environment Protection Licence

The PLR2 – EW may obtain an Environment Protection Licence (EPL) to conduct one or more of the following scheduled activities, pending consultation with NSW EPA:

- 'railway activities – railway infrastructure construction'
- 'road construction'.

Where an EPL is required, this Plan and Sub-plans will be reviewed and revised (if necessary) in accordance with Section 1.9. The PLR2 – EW will be constructed in a manner which satisfies the conditions of the EPL (where an EPL is obtained).

## 1.6. Scope of the Plan

The scope of this CEMP is to describe how the potential environmental and community impacts will be managed during the construction of the PLR2 – EW. This CEMP provides:

- A description of activities to be undertaken during construction (including scheduling)
- Details of the environmental and social policies, guidelines and principles to be followed in the construction of the PLR2 – EW
- A program for ongoing analysis of the key environmental and social impact risks arising from construction, building on the initial risk assessment undertaken as part of the CEMP
- Details of how construction of the PLR2 – EW will be carried out to meet the performance outcomes stated in the NSW and Federal approvals and Environmental Assessment Documentation, and how to manage the identified risks
- A general environmental inspection program detailing the activities to be inspected and frequency of inspections, noting that aspect-specific inspection requirements are addressed in relevant sub-plans
- Protocols for managing and reporting any incidents and non-compliances with the NSW and Federal approvals and with statutory requirements
- Procedures for rectifying any non-compliances identified during compliance auditing, incident management or at any time during construction
- A list of the Sub-plans prepared under this CEMP
- An organisational chart including description of the roles and environmental responsibilities for relevant employees and any independent appointments
- Details of training, inductions and awareness programs for construction personnel, including contractors and sub-contractors, in relation to environmental, social and compliance obligations
- A mechanism for periodic review and update of the CEMP and associated plans and programs, ensuring continual improvement.

This Plan is applicable to all activities during construction of the PLR2 – EW, including all areas where physical works will occur or areas that may be otherwise impacted by the construction works, and under the control of John Holland. All construction personnel, including sub-contractors, are required to operate fully under the requirements of this Plan and related environmental management plans, over the full duration of the construction program.

This Plan may also apply to person/s, contractors, consultants and suppliers where compliance with this Plan is a term of their engagement or association with John Holland. If at any time any part of this Plan or actions under it is, or becomes illegal, invalid, or void under the law of any jurisdiction, then that part of this Plan will be severed and will not apply.

This Plan has been prepared in accordance with the CEMF. In the preparation and ongoing implementation of this Plan, SMART (Specific, Measurable, Achievable, Realistic and Timely)





principles have been considered and applied. A copy of this Plan will be kept on the premises for the duration of construction and available to sub-contractors.

## 1.7. Sustainability

John Holland and TfNSW place a high importance on ensuring key sustainability outcomes are achieved in the delivery of the PLR2 – EW. Guided by the Sustainability Policy (including social considerations), addressing sustainability requirements will be an ongoing process throughout the project life cycle. PLR2 – EW will be delivered to meet the relevant objectives, targets and initiatives outlined in the PLR Stage 2 Sustainability Strategy, prepared by TfNSW in accordance with NSW CoA E108. One such target is the delivery of TfNSW's first IS v2.1 'Design' and 'As-Built' Rating. PLR2 – EW will be targeting a minimum 'Silver' rating for 'Design' and 'As-Built'.

To show commitment to delivering sustainable transport systems by embedding environmental, social, and economic considerations into the asset lifecycle, the TfNSW Sustainability Strategy has identified the following key themes:

- Respond to climate change
- Protect and enhance biodiversity
- Improve environmental outcomes
- Procure responsibly
- Partner with communities
- Respect culture and heritage
- Align spend and impact
- Empower customers to make sustainable choices.

Key initiatives from the TfNSW Sustainability Strategy that align with these objectives and the scope of PLR2-EW are listed in Table 4. Governance, monitoring, reporting and corrective action processes applicable to sustainability are detailed in the ESMS. See the Construction Sustainability Management Plan (PLR2EW-JHGRP-NWW-PM-PLN-000025) for more information.

*Table 4 – Key initiatives of the PLR Stage 2 Sustainability Strategy relevant to PLR2 – EW*

Focus Area	Key initiatives	How addressed
<b>Demonstrate leadership</b>	Develop performance targets across all sustainability themes	PLR2 – EW will target Lea-1 Level 2
	Achieve a high level of attainment of ISC v2.1 rating	PLR2 – EW will achieve an IS v2.1 'Silver' Design and As-Built Rating
	Share lessons learnt about sustainability with industry peers	PLR2 – EW will target Lea-3 Level 2
	Meet the minimum requirements detailed in the TfNSW Baseline Sustainability Requirements	The TfNSW Baseline Sustainability Requirements have been included in the Construction Sustainability Management Plan
	Ensure the project decision making framework includes sustainability criteria	Multi-criteria analysis used on the Project includes non-financial criteria that aligns with environmental, social, and economic considerations
	Monitor sustainability performance and provide public sustainability reports	PLR2 – EW will target Lea-1 Level 2
	Reward innovative approaches to the design, construction and operation of the Project	PLR2 – EW will seek to achieve at least two innovation points





Focus Area	Key initiatives	How addressed
<b>Empower communities</b>	Implement initiatives which will provide tangible benefits to local community groups during the construction period	PLR2 – EW will target Leg-1 Level 1
	Engage with stakeholders to align sustainable development approaches and minimise environmental impacts	PLR2 – EW will target Sta-1 and Sta-2 Level 2
	Establish and achieve targets for identifying and completing projects which benefit local communities and make a positive contribution to community health and well-being	PLR2 – EW will target Leg-1 Level 1
	Investigate and implement feasible opportunities to use residual land to benefit local communities	PLR2 – EW will target Pla-2 Level 2
<b>Respect the environment</b>	Minimise vegetation removal	PLR2 – EW will target Eco-1 Level 1. Refer to the FFMP for further details.
	Replace any trees and vegetation in accordance with the TfNSW Biodiversity Policy	PLR2 – EW will target Eco-1 Level 1
	Adopt an Environmental Management System (EMS) that meets with the requirements of ISO14001	John Holland's Integrated Management System (IMS) is certified to AS4801 and ISO14001
	Identify and manage existing soil and groundwater contamination which may be impacted by the Project	PLR2 – EW will target Rso-2 / Rso-3 Level 1
	Encourage contractors to utilise equipment with pollution control devices to reduce emissions from mobile non-road diesel plant and equipment at source	PLR2 - EW has sought to include SPR Appendix H 5(a)(v-vi) requirements for plant in subcontracts and plant onboarding systems
	Design the alignment to include effective multifunctional land use and connectivity to support urban communities and biodiversity	PLR2 – EW will target Pla-2 Level 2 and Eco-1 Level 1
	Divert office waste from landfill and partner with community initiatives such as "Mates on the Move"	PLR2 – EW will target Rso-4 Level 3
	Enable recycling of waste materials from office facilities and customers	PLR2 – EW will target Rso-4 Level 3
	Maximise recycling of construction and demolition waste by adopting waste recycling targets	PLR2 – EW will target Rso-4 Level 3
	Maximise reuse of existing materials, buildings, facades, and structures	PLR2 – EW will target Rso-4 Level 3
	Minimise the embodied impacts of materials, including high impact materials such as steel and concrete	PLR2 – EW will target Rso-6 Level 2
<b>Act on climate change</b>	Investigate and implement opportunities to use renewable energy (including small scale photovoltaics) during the construction phase	PLR2 – EW will seek to set up purchased renewable electricity agreements at all site facilities utilising grid connections
	Optimise integration of the Project with the most sustainable access modes including walking, cycling and bus	The head office is located next to Rhodes train station. The ancillary facilities are also accessible by walking, cycling and buses
	Incorporate energy efficient construction equipment, methods, and practices	PLR2 – EW will target Ene-1 Level 2







Focus Area	Key initiatives	How addressed
	Offset a considerable part of the greenhouse gas emissions associated with consumption of electricity during construction	PLR2 – EW will seek to establish renewable electricity agreements at all site facilities utilising grid connections
<b>Procure sustainably</b>	Assess tenders based on criteria that include environmental and social impacts/risks, quality, durability and whole-of-life costs	Multi-criteria analysis used on PLR2 – EW includes non-financial criteria that aligns with environmental, social, and economic considerations
	Provide sustainability training provided to high impact suppliers	Sustainability training to material (significant) suppliers will be documented in the Construction Sustainability Management Plan
	Conduct due diligence to ensure supply of materials and equipment from developing countries has not contravened environmental or human rights standards	John Holland subcontracts include provision to seek to prevent modern slavery
	Include consideration of whole-of-life costs and benefits in procurement	PLR2 – EW will target Ecn-1 Level 1
	Develop, implement and maintain processes and procedures for informing subcontractors of sustainable procurement requirements for purchase of materials, goods and services through all phases of the contract.	PLR2 – EW will achieve or exceed Spr-1 D/AB Level 2 PLR2 – EW will achieve or exceed Spr-2 D/AB Level 1 PLR2 – EW will achieve or exceed Spr-3 D/AB Level 1
<b>Deliver community resilience</b>	Require contractors and operators to undertake updated climate risk assessments	PLR2 – EW will target Res-1 / Res-2 Level 2
	Use data, hazard mapping and other tools to manage and quantify increasing catastrophe risks	
	Identify and implement adaptation measures to mitigate extreme and high level climate change risks	
	Identify sites vulnerable to flooding, mitigate impacts where feasible	
	Review emergency procedures (severe weather plan), to address climate change impacts	
	Design for forecast climatic conditions including potential, extreme weather events and increases in annual average temperatures	
	Identify opportunities to contribute to wider climate resilience through the Project	
	Investigate the use of shading structures and canopy cover to provide respite to passengers and provide microclimate benefits	
<b>Respect and integrate heritage</b>	Identify opportunities to enhance heritage values via education, design and implementation of heritage interpretation at those locations	PLR2 – EW will target Her-1 Level 1
	Engage a well-resourced team of both Aboriginal and non-Aboriginal heritage specialists / team members	
	Where items of heritage significance are identified, protection and enhancement of these will provide	





Focus Area	Key initiatives	How addressed
	benefits to the wider community through integration and education	
	Develop partnerships with relevant stakeholders to utilise heritage places and features to promote local heritage values	
	Investigate opportunities for enhancing heritage as part of the Project legacy	

## 1.8. Consultation and approval

### 1.8.1. Consultation

Reflecting the requirements of the Infrastructure Approval and Environmental Assessment Documentation, a number of the aspect specific Sub-plans and Construction Monitoring Programs which support this CEMP, have been prepared in consultation with the stakeholders nominated in Table 5. A detailed consultation report, including matters raised by stakeholders and John Holland responses, has been prepared for each relevant Sub-plan and Monitoring Program in accordance with NSW CoA A12.

Table 5 – Consultation requirements

Document	Environmental Representative	Acoustics Advisor	Relevant council(s) <sup>1</sup>	Relevant Road Authority	Relevant Emergency Services	SOPA <sup>2</sup>	Ferry operator	TfNSW (maritime operations)	LALCs <sup>3</sup>	Heritage NSW	RAPs <sup>4</sup>	AG DCCEW <sup>5</sup>	DPIRD Fisheries <sup>6</sup>	NPWS <sup>7</sup>	NSW DCCEW – Water Group <sup>8</sup>	BCS <sup>9</sup>	EPA <sup>10</sup>	Birdlife Australia
CEMP	✓																	
<b>CEMP Sub-plans</b>																		
CTTAMP	✓		✓	✓	✓	✓												
MWNMP	✓		✓			✓	✓	✓										
NVMP	✓	✓	✓			✓												
HMP	✓		✓			✓			✓	✓	✓							
FFMP	✓		✓			✓						✓	✓	✓	✓	✓		
SWMP	✓		✓			✓				✓			✓		✓			
AQMP	✓																	
WRMP	✓																	
<b>Construction Monitoring Programs</b>																		
Noise and Vibration	✓	✓	✓			✓											✓	
Water Quality	✓		✓			✓											✓	
Air Quality, Odour & Landfill Gas	✓																	
Biodiversity	✓					✓										✓		✓



#### Notes:

1. Relevant councils are the City of Parramatta Council and the City of Ryde Council.
2. Sydney Olympic Park Authority (SOPA)
3. Local Aboriginal Land Council(s) (LALCs)
4. Registered Aboriginal Parties (RAPs)
5. Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW)
6. NSW Department of Primary Industries and Regional Development – Fisheries (DPIRD Fisheries)
7. NSW National Parks and Wildlife Service, within the NSW Department of Climate Change, Energy, the Environment and Water (NPWS)
8. Water Group, of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW – Water Group)
9. Biodiversity Conservation and Science group of the NSW DCCEEW (BCS)
10. NSW Environmental Protection Authority (EPA)

Ongoing consultation will continue between TfNSW, John Holland, other PLR Stage 2 contractors, nearby construction projects, stakeholders, relevant agencies and the community prior to and during construction to review potential cumulative impacts and to co-ordinate, plan and integrate construction methodologies/ activities (including traffic impacts and noise management), as far as practicable to minimise cumulative impacts. This will include the coordination of respite between the various construction projects where nearby sensitive receivers are likely to experience concurrent construction impacts where feasible.

The approach to community consultation is documented in Community Communication Strategy (CCS). The CCS has been developed by TfNSW in accordance with NSW CoA B1 to B4, approved by the Planning Secretary, and described in the Communications and Engagement Plan (CEP).

John Holland will provide timely, accurate, relevant and accessible information about construction activities that may impact upon the community, with provision for feedback through the PLR Stage 2 community information line, postal address and email address.

### 1.8.2. Plan endorsement and approval

In accordance with the risk assessment outlined in the CEMF, this Plan will be endorsed by the ER prior to the commencement of Substage A2. Prior to the commencement of Substage A3, this Plan will be endorsed by the ER, and then submitted to the Planning Secretary for approval no later than one month before the commencement of construction of Substage A3. The specific activities included within Substage A2 and A3 are described in the CEMF and in Section 2.4.

Construction of each Substage will not commence until this CEMP, Sub-plans and Monitoring Programs have been approved by the Planning Secretary or endorsed by the ER (as applicable and as identified in the CEMF). The CEMPs, Sub-plans and Monitoring Programs, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, will be implemented for the duration of the PLR2 – EW.

## 1.9. Revision

The CEMP (including Sub-plans and Monitoring Programs) will be reviewed within one month of any of the below occurrences, or as otherwise agreed with the Planning Secretary:

- At least annually during management reviews (Section 7.7)
- Following reportable environmental incidents
- On identification of new risks, including risks identified during risk register updates
- When non-compliances are identified
- Following environmental audits that identify matters that require attention
- In response to project change (including consistency assessments and modifications)
- As part of a continuous improvement process.

Evidence of the document review process will be reflected in the respective Document History and Status table of each CEMP, Sub-plan and Monitoring Program (where document changes are required) or documented in a file note (where document changes are not required).







Should the review process identify any issues or items within the environmental management documentation that must be updated, it is the responsibility of the Environment and Sustainability Manager to update the documentation and then submit to TfNSW and the ER for review.

The CEMP (including Sub-plans and Monitoring Programs) are to be updated with improved environmental management measures where the original measures are found by John Holland, TfNSW, ER or a statutory authority, to not be fully effective in achieving the intended environmental outcome, or to address changed or evolving circumstances.

The following minor amendments made to this Plan may be approved by the ER, including:

- Amendments arising from Site Auditor advice (as detailed in an IAA)
- Amendments of an administrative nature, consistent with the terms of the Infrastructure Approval, and consistent with the management plans and monitoring programs approved by the Planning Secretary.

Other amendments will be submitted to the ER for endorsement and the Planning Secretary for approval (as applicable and as identified in the CEMP). Revised versions of the CEMP will be made available through the document control process described in Section 7.6.2 and on the Project website in accordance with NSW CoA B10.

Reflecting the requirements of the EPBC CoA 4, the Environment and Sustainability Manager will notify TfNSW of any proposed revision of the FFMP and /or this Plan. TfNSW in turn will notify the AG DCCEEW in writing of the proposed revision within:

- Two business days of formally proposing a revision, or
- Five business days of becoming aware of any proposed revision, accompanied by details of the proposed changes from the approved version (for example, by attaching a copy with tracked changes).

A copy of the updated FFMP and / or this Plan, and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure (Section 7.6.2).

Where the FFMP and / or this Plan have been amended and approved by the Planning Secretary, TfNSW will submit the approval to the AG DCCEEW within two business days of the Planning Secretary approval.



## 2. Project description

A detailed description of the Parramatta Light Rail network, PLR Stage 2, and the PLR2 – EW is provided in this section. Further background information is provided in the Project Staging Report, the CEMF and in the Environmental Assessment Documentation.

### 2.1. Parramatta Light Rail network

Strategic planning for the Central River City and GPOP makes reference to delivery of the Parramatta Light Rail network to tie the GPOP corridor together and provide improved connectivity to and from Greater Parramatta. Parramatta Light Rail provides a catalyst for urban renewal along its length by providing connections to areas that will be transformed through significant NSW Government and private investment.

Parramatta Light Rail is being delivered in stages to ensure the infrastructure needed to support growth and development is in place:

- PLR Stage 1 will connect Westmead to Carlingford via the Parramatta central business district and Camellia. The construction and operation of PLR Stage 1 was approved by the Planning Secretary in May 2018. Testing and commissioning of light rail vehicles is currently underway with operation expected in 2024. Further information on PLR Stage 1 is available at [Parramatta Light Rail](#).
- PLR Stage 2 (the subject of the NSW and Federal approvals) will connect the Parramatta CBD and PLR Stage 1 to Camellia, Rydalmere, Ermington, Melrose Park, Wentworth Point, Sydney Olympic Park and the Carter Street precinct in Lidcombe, adjacent to Sydney Olympic Park.

### 2.2. PLR Stage 2

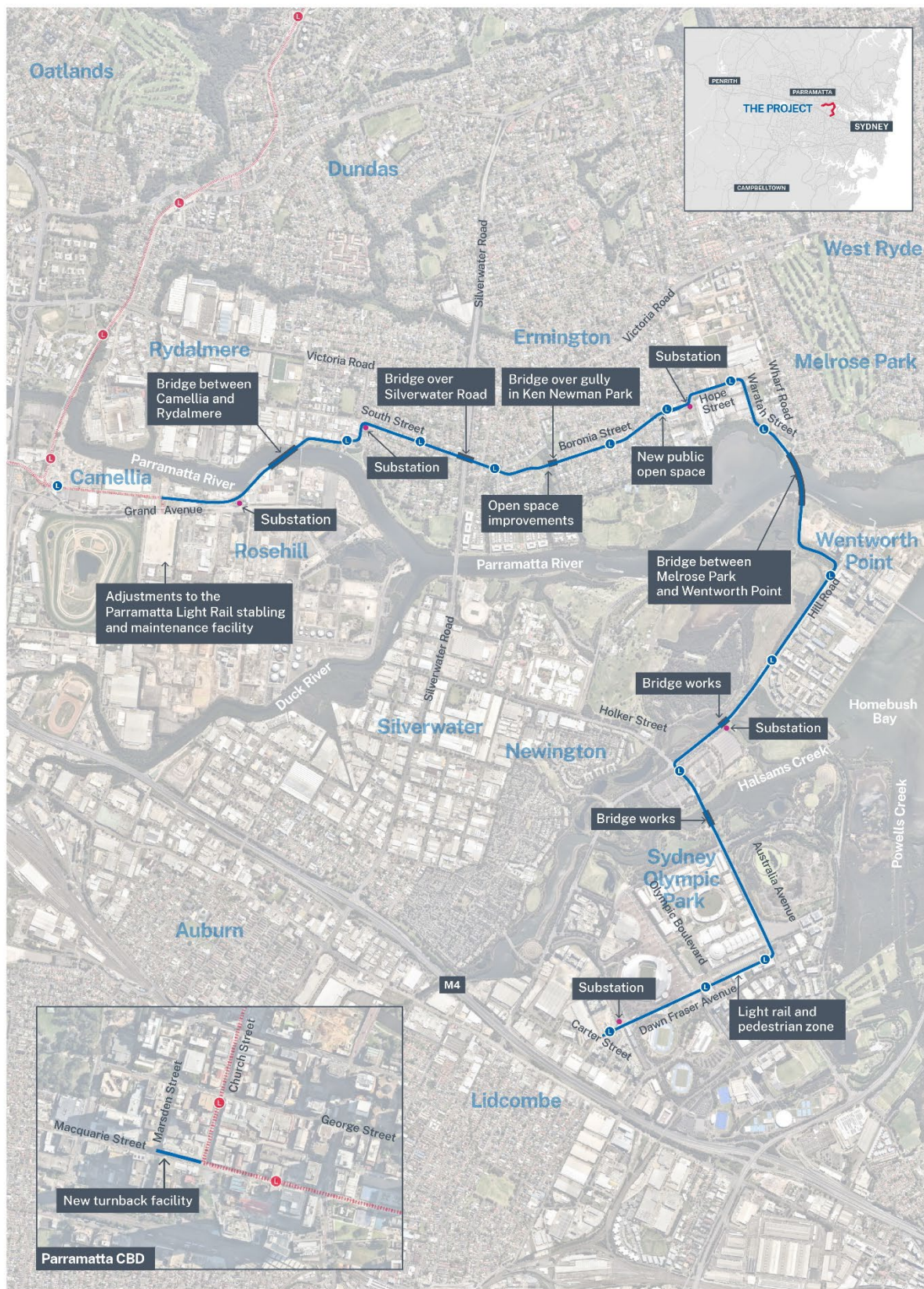
The key features of PLR Stage 2 are:

- A new 10 kilometre long dual light rail track, with 14 stops, between the PLR Stage 1 line in Camellia and the Carter Street precinct, adjacent to Sydney Olympic Park
- Two bridges over the Parramatta River between Camellia and Rydalmere, and between Melrose Park and Wentworth Point
- A bridge over Silverwater Road between Rydalmere and Ermington
- Other bridge works in Ken Newman Park and Sydney Olympic Park
- Around 9.5 kilometres of new active transport links between Camellia and the Carter Street precinct, which will connect with the existing cycling and pedestrian network
- Interchanges with other forms of public transport, including trains, ferries, buses and Sydney Metro West, with the main interchanges located in the Parramatta CBD, Rydalmere and Sydney Olympic Park
- A shared light rail and pedestrian zone (no through vehicle access) within Sydney Olympic Park along Dawn Fraser Avenue between Australia Avenue and Olympic Boulevard
- Bus access over the proposed bridge between Melrose Park and Wentworth Point
- Turnback facilities, including along part of Macquarie Street in the Parramatta CBD
- Adjustments to the Parramatta Light Rail stabling and maintenance facility at Camellia
- Five new traction power substations to convert electricity to a form suitable for use by light rail vehicles
- New and improved open spaces and recreation facilities at Eric Primrose Reserve, Ken Newman Park and the Atkins Road stop.

An overview of PLR Stage 2 route is shown Figure 1.







LEGEND

- Proposed project alignment
- Proposed project stops
- Parramatta Light Rail Stage 1 alignment
- Parramatta Light Rail Stage 1 stops

0 1km



Figure 1 – The PLR Stage 2 project (source: TfNSW)





## 2.3. PLR Stage 2 Staging

As noted in Section 1.2.3, construction of PLR Stage 2 will be staged to align with TfNSW's procurement and delivery strategy. Staging of PLR Stage 2 by geography is presented in Figure 2.

Parramatta CBD	Camellia	Rydalmere East	Ermington	Melrose Park	Wentworth Point	Sydney Olympic Park	Carter Street
				Stage A: Bridge between Melrose Park and Wentworth Point Design and construction of bridge and associated civil and public domain works			
Stage B: Main alignment construction works Design and construction of civil works, public domain and light rail infrastructure up to road level / top of rail and to the top of the concrete slab at stops, including provision of all utility services (excluding high- voltage power supply and cabling for rail systems)						Stage B: Main alignment construction works Cont'	
Stage B: Supply, operate and maintain system works Design and construction of light rail systems, high-voltage power supply and stops above slab level, the support of light rail vehicles and adjustments to the stabling and maintenance facility							

Figure 2 – PLR Stage 2 construction staging (source: TfNSW)

## 2.4. PLR2 – Enabling Works (the Project)

Stage A of the PLR Stage 2, the PLR2 – EW, includes a crossing of the Parramatta River between Melrose Park and Wentworth Point to provide a direct public and active transport (walking and cycling) connection between the precincts north of the river and Sydney Olympic Park, enabling a substantial decrease in journey time from Melrose Park to Sydney Olympic Park as well as from Melrose Park to the retail and local services hub of Rhodes (via Bennelong Bridge). This crossing (Figure 3) will be designed to support shared running between light rail and bus services to future proof the transport corridor for potential bus routes as well as light rail operations.



Figure 3 – Artists impression of the PLR2 – EW bridge over the Parramatta River

### 2.4.1. Key features of the Project

The key features of the PLR2 – EW scope of works is provided in Table 6 and a map of the extents of the work is provided in Figure 4.





Table 6 – Key features of the PLR2 – EW scope of works

Worksite	Scope	Description
<b>Melrose Park</b>	Utilities	<ul style="list-style-type: none"> <li>Investigations of utility assets and preparation of Safety Management Study applications for working around the Viva Energy fuel pipeline</li> <li>Relocation and/or protection of utility services to facilitate PLR2 – EW</li> </ul>
	Site establishment and temporary works	<ul style="list-style-type: none"> <li>Establishment of the main site compound and environmental controls</li> <li>Construction of hardstand for piling platform and crane pad</li> <li>Construction of temporary boat and trailer carpark to enable ramp access on weekends and public holidays</li> </ul>
	Main construction	<ul style="list-style-type: none"> <li>Relocation of the existing Viva Energy fuel pipeline to enable bulk earthworks, foundation treatments, and construction of new car park</li> <li>Construction of drainage</li> <li>Construction of Light Rail track slab</li> </ul>
<b>Bridge Works</b>	Access tracks and working platforms	<ul style="list-style-type: none"> <li>Installation of erosion and sediment controls, salvage of recorded midden, and progressive clearing of mangroves to root level</li> <li>Construction of temporary platforms in Parramatta River to enable access to Pier 1 and Pier 2</li> </ul>
	Main construction	<ul style="list-style-type: none"> <li>Installation of piling and caps</li> <li>Construction of blade walls at piers using pre-assembled formwork</li> <li>Construction of pier head in three phases: base slab, webs and diaphragms, and top slab</li> <li>Installation of bridge deck superstructure</li> </ul>
	Finishing works	<ul style="list-style-type: none"> <li>Installation of barrier</li> <li>Completion of final levelling and grouting of the steel railing</li> <li>Installation of the underdeck drainage on the Light Rail side</li> <li>Construction of reinforced concrete upstands (cast in situ) with conduit/cable separators</li> <li>Installation of multi-function poles</li> <li>Surfacing of bridge deck prior to Light Rail track slab construction</li> </ul>
<b>Wentworth Point</b>	Site establishment and temporary works	<ul style="list-style-type: none"> <li>Establishment of site compound and environmental controls</li> <li>Clearing and grubbing of vegetation</li> </ul>
	Utilities	<ul style="list-style-type: none"> <li>Decommission redundant Ausgrid transition point at Hill Road</li> <li>Relocation and/or protection of utility services</li> </ul>
	Main construction	<ul style="list-style-type: none"> <li>Construction of elevated structure spanning the landfill and tie into Sekisui House</li> <li>Construction of remaining spans to tie into Hill Road (including earthworks for new bus corridor and pavement widening on Hill Road)</li> <li>Road works (drainage, pavements and signalised intersection)</li> </ul>
<b>Track</b>	Track slabs	<ul style="list-style-type: none"> <li>Pouring of concrete</li> <li>Installation of rail</li> </ul>
<b>Finishing and demobilisation</b>	Landscaping and finishing works	<ul style="list-style-type: none"> <li>Installation of architectural treatments, urban design features, landscaping, street furniture, paving, signage, and pavement marking</li> <li>Defect rectification and demobilisation</li> </ul>



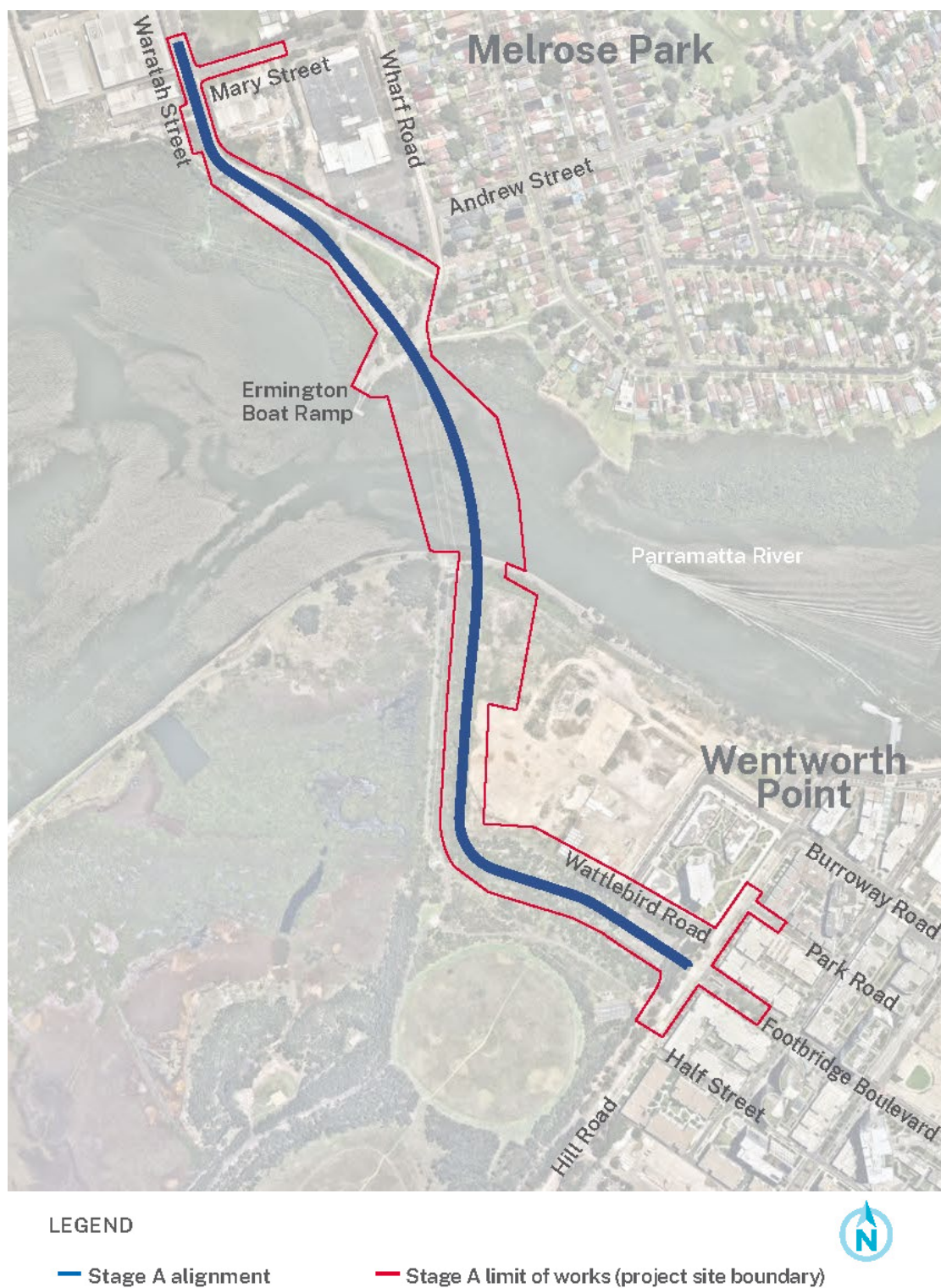


Figure 4 – Extent of PLR2 – EW (Stage A) – Bridge between Melrose Park and Wentworth Point (source: TfNSW)

## 2.4.2. PLR2 – EW Substages

The Project Staging Report identifies that the PLR2 – EW will be carried out in Substages, including:

- Substage A1 – Pre-construction
- Substage A2 – Preliminary construction works
- Substage A3 – Main construction works and testing and commissioning.

Table 7 provides details of the activities to be carried out under each Substage.





The CEMP, all Sub-plans and all Monitoring Programs are applicable to Substages A2 and A3 and any activities from Substage A1 that were not completed prior to approval of the CEMP and Sub-plans. Substages will not commence until the relevant Substage is approved to commence by the relevant authority (Section 1.8.2).

### 2.4.3. Construction activities

The PLR2 – EW includes the following construction activities:

- Site establishment, including installation of environmental controls
- Construction and use of ancillary facilities (including carparks, office buildings, laydown areas)
- Installation and use of minor ancillary facilities
- Clearing and grubbing
- Relocation of utilities and services
- Demolition and removal of redundant structures
- Earthworks
- Installation of temporary rock causeways (subject to separate approvals)
- Construction of a new bridge (including piling)
- Boat and barge movements, including loading and unloading facilities for bridge works
- Material haulage and deliveries
- Traffic management and access changes (temporary and permanent)
- Road works
- Construction of drainage and pavements
- Finishing work and site restoration (road furnishing and landscaping).

An indicative construction sequence is provided in Table 7, including indicative plant and equipment requirements. The indicative duration of construction for the PLR2 – EW is provided in Figure 5.

Construction activities will be planned to minimise disruption to the Ermington Boat Ramp where feasible and reasonable, including minimising impacts to recreational use of the Parramatta River. Planning will include a review of the usage of the facilities at Ermington Boat Ramp and at other existing boat ramps in the vicinity of the PLR2 – EW.

Construction planning will also minimise the duration that land is required to the shortest possible duration, particularly where the land requirements affect recreation/open space areas.

Construction of the bridge will generally involve:

- Construction of foundations (piling)
- Construction of bridge piers
- Construction of bridge abutments and spill-throughs where required
- Construction of blade walls at piers using pre-assembled formwork
- Construction of pier head in three phases: base slab, webs and diaphragms, and top slab
- Installation of bridge deck superstructure.

In accordance with NSW CoA E54 PLR2 – EW will be constructed in a manner that minimises visual impacts of construction sites. Measures include providing temporary decorative hoarding, landscaping and vegetative screening, minimising light spill, or incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, including recognition of Country.





Table 7 – Indicative construction sequence of the PLR2 – EW

Substage	Construction phase	Activities	Plant and equipment
A1 <sup>1</sup>	Pre-construction, including heritage investigations and low impact works	<ul style="list-style-type: none"> <li>Surveys</li> <li>Investigations</li> <li>Site establishment activities, including setup of minor ancillary facilities, establishing site access and installation of environmental controls</li> <li>Installation of project signage</li> <li>Erect temporary fencing and hoarding (where required) around pre-construction works footprint perimeter</li> <li>Install safety barriers and traffic control devices for protection of the work area</li> <li>Minor clearing of vegetation</li> <li>Geotechnical and utilities investigations</li> <li>Environmental and heritage investigations</li> <li>Other work meeting the definition of Low Impact Work under the Infrastructure Approval</li> </ul>	<ul style="list-style-type: none"> <li>Traffic control</li> <li>Temporary fencing</li> <li>Excavators (up to 14-20 tonnes)</li> <li>Site vehicles, tippers and bogies</li> <li>Plate compactors and small rollers</li> <li>Elevated work platforms</li> <li>Water cart</li> <li>Steel plates</li> <li>20T Franna crane</li> <li>Compressor</li> <li>Vacuum truck</li> <li>Drilling Rig</li> <li>Generators</li> <li>Hand tools</li> <li>Other equipment deemed to support the work defined as Low Impact Work</li> </ul>
A2	Preliminary construction works, including utility works, temporary works (non-marine), ongoing site establishment and investigations	<ul style="list-style-type: none"> <li>Relocation of the Viva Energy pipeline, Ausgrid 132 kV, and Endeavour Energy 11 kV overhead powerlines</li> <li>Relocation of the Ausgrid high voltage transmission line to three new poles</li> <li>Removal of the Ausgrid high voltage transmission tower in Archer Park</li> <li>Relocation and/or protection of Sydney Water potable water, recycled water and wastewater utilities</li> <li>Relocation and/or protection of Jemena gas utilities</li> </ul>	<p>Plant and equipment as per Substage A1, as well as:</p> <ul style="list-style-type: none"> <li>Larger excavators (20-30 tonnes) and earthwork plant and equipment</li> <li>Mulcher</li> <li>Chainsaws and other vegetation removal equipment</li> <li>Cranes and working platforms</li> <li>Piling equipment (bored piles)</li> </ul>







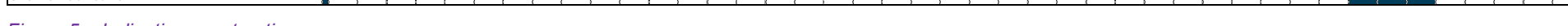
Substage	Construction phase	Activities	Plant and equipment
		<ul style="list-style-type: none"> <li>Relocation and/or protection of telecommunication utilities</li> <li>Relocation and/or protection of Endeavour Energy high voltage utilities</li> <li>Relocation and/or protection of SOPA communications utilities</li> <li>Geotechnical and utilities investigations not completed during Substage A1.</li> <li>Site establishment not completed during Substage A1, including ongoing site compounds setup and use</li> <li>Vegetation removal</li> <li>Installation of temporary working platforms (land-based)</li> <li>Installation of internal haul roads and access points</li> </ul>	<ul style="list-style-type: none"> <li>Concrete trucks</li> <li>Asphalting equipment.</li> </ul>
A3	Main construction works and testing and commissioning, including marine works, bridge construction and all other construction activities	<ul style="list-style-type: none"> <li>Transfer of construction equipment via barge</li> <li>Installation of new navigation aid piles and marine site delineation</li> <li>Construction of a new crew transfer / safety evacuation pontoon</li> <li>Installation of temporary mooring piles</li> <li>Installation of temporary working platforms including, piling, installation of prefabricated steel headstock and pile bracing, installation of primary beams and decking and fitting of handrails.</li> <li>Removal of remaining trees and vegetation and offset planting</li> <li>Remaining earthworks and retaining structures</li> <li>Road works including connections to the existing road network: <ul style="list-style-type: none"> <li>Removing existing kerb, gutters, median strips and redundant infrastructure</li> <li>Milling and excavation to the level required for the installation of the track slab</li> <li>Placing and compacting road base and road pavement works</li> <li>Integration with existing road pavements (where required)</li> <li>Constructing new kerbs, gutters and other drainage</li> </ul> </li> </ul>	Plant and equipment as per Substage A2, as well as: <ul style="list-style-type: none"> <li>Barges</li> <li>Piling rigs (impact piling)</li> <li>Rock breakers.</li> </ul>





Substage	Construction phase	Activities	Plant and equipment
		<ul style="list-style-type: none"> <li>– Erection of directional, wayfinding, regulatory and other signage</li> <li>– Erection of roadside furniture</li> <li>– Road paving and pavement marking</li> <li>– Constructing tie-ins to existing roads</li> <li>– Installing / modifying traffic lights, induction loops and signage</li> <li>▪ Drainage works</li> <li>▪ Light rail civil infrastructure and track and stop slabs, including installation of services conduits, placing steel reinforcement and concrete formwork and pouring concrete</li> <li>▪ New bridge between Melrose Park and Wentworth Point <ul style="list-style-type: none"> <li>– Excavation works at approaches and supports</li> <li>– Construction of bridge abutments on the approaches to the bridge</li> <li>– Piling and construction of pile caps</li> <li>– Construction of bridge piers</li> <li>– Constructing bridge superstructure, which includes: <ul style="list-style-type: none"> <li>▸ Lifting and installing concrete girders and/or precast concrete bridge segments using cranes</li> <li>▸ Off-site assembly of structural elements and lifting into place</li> <li>▸ In-situ concrete pouring of bridge superstructure elements <ul style="list-style-type: none"> <li>▸ Concrete pouring the bridge deck</li> </ul> </li> </ul> </li> <li>– Other bridge fit-out works, including installing handrails and other safety and operational infrastructure.</li> </ul> </li> <li>▪ Provision of active transport links for pedestrians and cyclists</li> <li>▪ Urban and architectural design and finishes of the corridor and public domain, including replacement public car parking and construction of a new amenities building (if required)</li> </ul>	







## 2.4.4. Ancillary facilities

Ancillary facilities are required to support construction of the PLR2 – EW, comprising:

- Temporary buildings (generally prefabricated) including offices and meeting rooms, amenities and first aid facilities
- Hardstand parking areas with sufficient space to accommodate the numbers of construction workers expected at any site
- Materials laydown, storage and handling areas, including purpose built temporary structures as required.

There are two types of ancillary facilities to be used during construction:

- Minor Construction Ancillary Facility: Worker amenities and materials laydown and the like, that meet the requirements of NSW CoA C7 (Section 2.4.5)
- Construction Ancillary Facility: A temporary facility required for the construction of PLR2 – EW, including an office and amenities compound, construction compound, materials storage compound, maintenance workshop, material stockpile area, access and car parking facilities and utility connections to the facility.

The Environmental Assessment Documentation identified and assessed two construction ancillary facilities for use during the PLR2 – EW as described in Table 8. This table also includes an additional compound proposed to be utilised during construction, described as “Wentworth Point south”.

*Table 8 – Construction Ancillary Facilities for PLR2 – EW*

No.	Name	Location	Primary use
<b>1</b> (EIS ref. 7)	Wharf Road	Archer Park, Waratah Street, Ermington Boat Ramp, Wharf Road, Melrose Park	Support works for the bridge between Melrose Park and Wentworth Point from the northern side of the Parramatta River and associated infrastructure. Facility includes site offices, car parking, amenities, materials laydown and utility connections.
<b>2</b> (EIS ref. 8)	Wentworth Point north	Sanctuary Wentworth Point	Support works for the bridge from the southern side of the Parramatta River. Facility includes site offices, car parking, amenities, materials laydown and utility connections.
<b>3</b>	Wentworth Point south	West of Hill Road near intersection with Footbridge Boulevard	Support works for the approach to Parramatta River from Hill Road and land bridge through SOPA land in Wentworth Point

Where additional Construction Ancillary Facilities are required for construction that are not identified by description or location in the Environmental Assessment Documentation, they will be assessed through an assessment of consistency with the NSW and Federal approvals and approved by the proponent (TfNSW). Where additional Construction Ancillary Facilities are determined by TfNSW to not be consistent, a modification assessment report will be prepared for the Planning Secretary’s approval.

Construction Ancillary Facilities are to be operated during the approved standard hours only unless otherwise permitted through an out of hours works (OOHW) approval developed in accordance with the Infrastructure Approval and EPL (where obtained). See the NVMP for more details on the approval of OOHW, including at ancillary facilities.

Prior to the use of each Construction Ancillary Facility, a Pre-construction Ancillary Facility Dilapidation Report will be prepared, which includes a full photographic record and soil samples (at a frequency of five per 1000 m<sup>2</sup>, and at-risk relative locations) and documents all assets, structures (above / below ground), directly adjacent land uses, and any defects at the facility.





Once a Construction Ancillary Facility is no longer required for PLR Stage 2, in accordance with NSW CoA C6, the land will be returned to its pre-existing or better condition within six (6) months of the facility being decommissioned or within two (2) years of operation (whichever is the earliest). Construction Ancillary Facilities used for PLR2 – EW may be transferred to TfNSW or other PLR Stage 2 contractors for delivery of Stage B and reinstatement to satisfy NSW CoA C6. Post-construction Ancillary Facilities Dilapidation Reports will be prepared for each Construction Ancillary Facility using comparable records and sampling as for the pre-construction assessments.

Boundary screening will be erected around all Construction Ancillary Facilities (excluding minor ancillary facilities, Section 2.4.5) that are adjacent to sensitive land uses for the duration of construction in accordance with NSW CoA C8, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s). Boundary screening will minimise, as far as practicable, visual impacts on adjacent sensitive receivers and include:

- Erecting hoarding/fencing as early as possible in the site establishment phase to provide visual screening
- Using high quality materials suitable for parks and public spaces where sites are located close to sensitive receivers and public open space
- Featuring graphics, artwork or Project information at appropriate locations in consultation with TfNSW
- Maintaining hoarding/fencing regularly, including the prompt removal of graffiti.

The CSSI name; application number; telephone number, postal address and email address required under NSW CoA B6 of the Infrastructure Approval will be made available on boundary fencing / hoarding at each ancillary facility before the use of the ancillary facility.

#### 2.4.5. Minor Ancillary facilities

Minor Ancillary Facilities assessed in the Environmental Assessment Documentation can be used for construction without needing approval from the ER. For Minor Ancillary Facilities not included in the Environmental Assessment Documentation, the Environment and Sustainability Manager (or delegate) will prepare minor ancillary facilities assessments for review and approval by the ER in accordance with NSW CoA C7. See Appendix A3 for the Minor Ancillary Facilities checklist template.

Minor Ancillary Facilities can be established and used where they are located within or immediately adjacent to the construction boundary and have been assessed by the ER to have:

- Minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the *Interim Construction Noise Guideline* (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts
- Minimal environmental impact with respect to waste management and flooding
- No impacts on biodiversity, soil and water, and heritage items beyond those already approved under the NSW and Federal approvals.

## 2.5. Light spill

The PLR2 – EW will be designed and constructed to minimise glare and light spill to surrounding properties and ecologically sensitive areas in accordance with NSW CoA E58 and UMM LV7. Lighting associated with the construction and operation of the PLR2 – EW will be consistent with the requirements of:

- AS/NZS 4282:2019 *Control of the obtrusive effects of outdoor lighting*
- AS/NZS 1158:2022 *Lighting for Roads and Public Spaces* (and relevant Australian Standards in the series)
- *National Light Pollution Guidelines for Wildlife* (AG DCCEEW, 2023).

Prior to commencement of construction, the location, extent, type and sensitivity of light receptors and their pre-existing exposure to light will be determined. This will be achieved through a lighting audit







by a suitably qualified professional in accordance with ISC Env-5. Further, lighting impacts from the Project will be modelled and design measures identified and implemented to prevent light spill. Modelling must demonstrate no more than 2 horizontal lux level over the Project boundary and 2 per cent upward light ratio (excluding decorative lighting).

Mitigation measures will be implemented to manage residual impacts of lighting to protect properties adjoining or adjacent to the PLR2 – EW, in consultation with affected landowners. Lighting of work areas, compounds, and work sites will be oriented to minimise glare and light spill impact on adjacent receivers.

## 2.6. Closed-circuit television

The placement, obstruction (in relation to existing) and removal of closed-circuit television (CCTV) cameras will be undertaken in consultation with the CCTV asset owner, adjoining or adjacent property owners and the relevant public authority and relevant Council(s) in accordance with NSW CoA E59.

## 2.7. Utilities

Utilities and services potentially affected by PLR2 – EW will be identified to determine requirements for diversion, protection and/or support. This will include conducting utilities investigations as required, including intrusive investigations. Alterations to utilities and services will be determined through negotiation between the John Holland or TfNSW and the service providers. In consultation with service providers, John Holland will ensure that disruption to utilities and services resulting from the PLR2 – EW are avoided where possible and where unavoidable, customers will be advised in advance using the mechanisms described in the CCS and CEP.

Details of the proposed utilities and services works is provided in the Utilities Management Strategy (PLR2EW-JHGRP-NWW-EV-PLN-000001) developed to satisfy NSW CoA E130. The Utilities Management Strategy will be prepared in consultation with relevant Council(s), SOPA (in Sydney Olympic Park) and relevant utility providers and implemented for all utility work undertaken as a result of the PLR2 – EW. The Utilities Management Strategy will be submitted to the Planning Secretary for approval at least one month before the commencement of utility Work.

To identify potential risks, including those associated with proposed alterations to the gas and fuel pipelines, a Safety Management Study will be undertaken in accordance with AS/NZS 2885.6:2018 *Pipelines—Gas and liquid petroleum, Part 6: Pipeline safety management*. The outcomes of the Safety Management Study will be incorporated in construction planning and design development.

Access to all utilities, open space and properties will be maintained during construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.

It is noted that nothing in the Infrastructure Approval permits the carrying out of any utility work not required for the purpose of the PLR2 – EW in accordance with NSW CoA E136.

## 2.8. Land acquisition and property adjustment plans

TfNSW are responsible for all property acquisitions which will be undertaken in accordance with the requirements of the *Land Acquisition (Just Terms Compensation) Act 1991*, the land acquisition reforms announced by the NSW Government in 2016, and the recommendations of the Auditor General's 2021 review of TfNSW's acquisition practices.

TfNSW will appoint Personal Relationship Manager(s) to assist residential landowners and tenants who may be affected by acquisition. The Personal Relationship Manager(s) will maintain regular contact with these individuals to provide assistance with the acquisition process, including updates on the project, and respond to queries. The Personal Relationship Manager(s) will work with the landowners and tenants to offer assistance and support throughout the acquisition process.

John Holland will seek to secure agreements with affected landowners/landholders, to guide property-level design requirements and the management of construction on, or immediately adjacent to, private properties. Property adjustment plans will be prepared in consultation with impacted landowners / landholders in accordance with UMM LP8. Property adjustment plans will define the works required to







properties affected by acquisition and those requiring adjustments as a result of the PLR2 – EW. Works will include, but not be limited to, adjustments to driveways, fences, trees and landscaping.

## 2.9. Other projects in development – cumulative impacts

In addition to Stage B of PLR Stage 2 which may be delivered concurrently, there are a number of other construction projects and developments proposed or concurrently being delivered within the vicinity of the PLR2 – EW, including, but not limited to:

- Melrose Park North Planning Proposal applies to land at 8, 38-42, 44 & 44A Wharf Road, Melrose Park, 15-19 & 27-19 Hughes Avenue and 655 Victoria Road, Ermington
- Melrose Park South Planning Proposal applies to two separate sites owned by Holdmark at 112 Wharf Road and 30 & 32 Waratah Street, Melrose Park (east site) and 82 Hughes Avenue, Ermington (west site)
- Sanctuary, Wentworth Point (development in construction)
- 9-11 Burroway Road, Wentworth Point (development in construction)
- 37-39 Hill Road, Wentworth Point (proposed development)
- Various areas identified within the Sydney Olympic Park Master Plan 2030 to include more residential homes, education sites, local parks and retail spaces, amongst other changes
- Sydney Metro West at Sydney Olympic Park
- Drainage works along Hill Road, identified during consultation with representatives of City of Parramatta Council.

It is noted that the scale of cumulative impacts is dependent upon timing, location and type of construction activities. Regular interface meetings will be undertaken with government authorities, neighbouring PLR Stage 2 works, other projects, developers, and stakeholders as detailed in Sections 5.5.2 and 5.5.3, and within the CCS and CEP.



### 3. Environmental management system overview

#### 3.1. Environment and Sustainability Management System

To achieve the intended environmental performance outcomes required for each project, since 1999, John Holland have established, implemented, maintained and continually improved an Environment and Sustainability Management System (ESMS) which meets the ISO14001:2016 requirements.

The ESMS is applied to all John Holland projects, including the PLR2 – EW, and is proven and robust. The basis for the ESMS is the concept of Plan-Do-Check-Act (PDCA). The PDCA model provides an iterative process to achieve continual improvement:

- **Plan:** Establish environmental and sustainability objectives and processes necessary to deliver results in accordance with the John Holland Environment Policy
- **Do:** Implement the processes as planned
- **Check:** Monitor and measure processes against the Environment Policy, including its commitments, objectives and operating criteria, and report the results
- **Act:** Take action to continually improve.

Using the concepts and processes of the John Holland ESMS, this CEMP provides a 'roadmap' that links the relevant legislative, project-specific requirements and guidelines (such as from the Environmental Assessment Documentation, NSW and Federal approvals, contractual requirements, and TfNSW and industry guidelines) to the ESMS and describes how to fulfil these requirements.

Figure 6 shows how the framework introduced in ISO 14001 is integrated into the PDCA model within the John Holland ESMS and this CEMP.

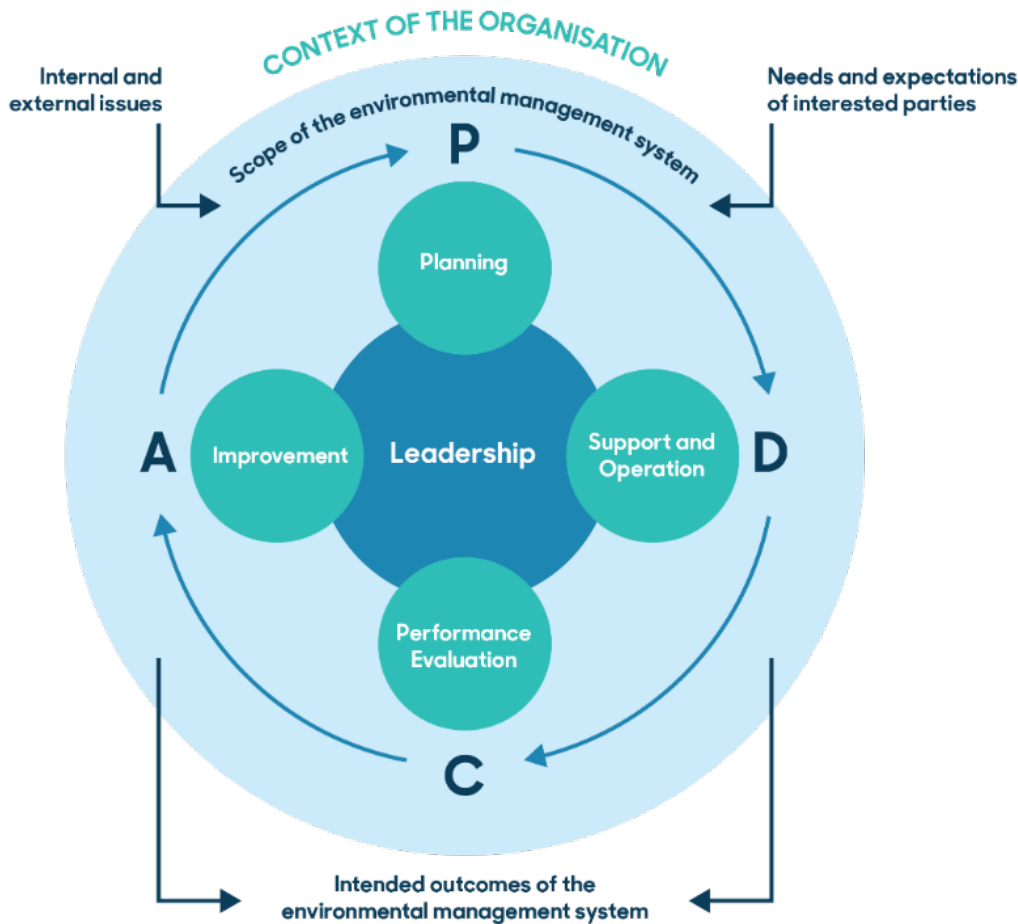


Figure 6 – John Holland's PDCA model





The Project specific ESMS is built from John Holland's ISO AS/NZS 14001 ESMS and comprises a combination of governance documents, including this CEMP, aspect-specific Sub-plans, Monitoring Programs and procedures. The ESMS ensures:

- Environmental risk identification and management is central to all project decision-making, from initial design investigations to site establishment, construction and demobilisation
- Comprehensive integration with other PLR2 – EW management documents, including environmental technical studies which will inform design development, quality assurance and document control management, and work area planning processes which also address site safety and community engagement.

## 3.2. Environment Policy

The John Holland Environment Policy provides John Holland's commitment to continual improvement in environmental performance and compliance with applicable legal requirements and is consistent with the TfNSW's Environment and Sustainability Policy. John Holland's policy is provided in Appendix A2.

The John Holland Environment Policy will be displayed at PLR2 – EW site offices and communicated to all PLR2 – EW construction personnel, including sub-contractors and other interested parties via inductions and ongoing awareness programs (Section 5.3).

## 3.3. Construction Environmental Management Plan

As a key guidance document of the ESMS, this CEMP integrates the environmental management requirements, TfNSW obligations and community expectations into location and activity specific actions, tools and procedures which are to be implemented during the construction of PLR2 – EW.

This CEMP provides the environmental management protocols which, if adequately implemented, ensures that the PLR2 – EW is delivered in accordance with the NSW and Federal approvals and commitments of the Environmental Assessment Documentation. This CEMP also addresses the relevant Infrastructure Sustainability Council (ISC) requirements, supported by the Construction Sustainability Management Plan (PLR2EW-JHGRP-NWW-PM-PLN-000025).

This Plan and the aspect specific Sub-plans have been prepared in accordance with the *Guideline of the Preparation of Environmental Management Plans* (DIPNR, 2004), *Environmental Management Plan Guideline – Guideline for Infrastructure Projects* (DPE, 2020) and relevant TfNSW guidelines.

The supporting appendices prepared under the CEMP comprise:

- Appendix A1      Secondary CoA and UMMs
- Appendix A2      Environment and Sustainability Policy
- Appendix A3      Minor Ancillary Facilities checklist template
- Appendix A4      Environmental Control Map template
- Appendix A5      Environmental Incident Procedure
- Appendix A6      Environmental Work Method Statement template
- Appendix A7      AA and ER Endorsements.

In addition to the Sub-plans and Construction Monitoring Programs, described in Section 3.3.1, other documentation is required to support delivery of PLR2 – EW as described in the following sections.

Any document that is submitted or action taken within a timeframe specified in or under the terms of the Infrastructure Approval may be submitted or undertaken within a later timeframe if agreed with the Planning Secretary in writing in accordance with NSW CoA A9. This does not apply to the written notification required in respect of an incident or a non-compliance.





### 3.3.1. Sub-plans and Construction Monitoring Programs

Aspect-specific environmental management Sub-plans, which include as relevant Construction Monitoring Programs (Monitoring Programs), have been developed as required by the Infrastructure Approval and Environmental Assessment Documentation to support this CEMP. Where applicable, the Monitoring Programs have been included as an appendix to the relevant Sub-plan.

The CEMP, all Sub-plans and all Monitoring Programs are applicable to Substages A2 and A3 (as detailed in Section 2.4.2) and any activities from Substage A1 that were not completed prior to approval of the CEMP and Sub-plans.

The Sub-plans and Monitoring Programs have been prepared under and consistent with the CEMP, the requirements of the NSW and Federal approvals, the Environment Assessment Documentation, and relevant legislation and guidelines. The Sub-plans address the requirements listed in NSW CoA C14 to C19 and the relevant UMMs (see Section 1.4 for details). The Monitoring Programs address the requirements listed in NSW CoA C20 to C28.

The Sub-plans and Monitoring Programs have been prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2. The Sub-plans and Monitoring Programs have also been prepared to compare the actual performance of construction of the PLR2 – EW against the performance objectives described in the Environmental Assessment Documentation, in accordance with NSW CoA C14 and C19.

The Sub-plans include:

- Appendix B1 Construction Traffic, Transport and Access Management Sub-plan (CTTAMP)
- Appendix B2 Maritime Works and Navigation Management Sub-plan (MWNMP)
- Appendix B3 Noise and Vibration Management Sub-plan (NVMP)
- Appendix B4 Heritage Management Sub-plan (HMP)
- Appendix B5 Flora and Fauna Management Sub-plan (FFMP)
- Appendix B6 Soil and Water Management Sub-plan (SWMP)
- Appendix B7 Air Quality Management Sub-plan (AQMP)
- Appendix B8 Waste Management Sub-plan

Monitoring Programs include:

- Noise and Vibration Monitoring Program, Appendix B of Appendix B3
- Surface Water Quality Monitoring Program, Appendix B of Appendix B6
- Air Quality, Odour and Landfill Gas Monitoring Program, Appendix B of Appendix B7
- Biodiversity Monitoring Program (standalone document developed by TfNSW).

### 3.3.2. Other plans and strategies

In addition to the CEMP, Sub-plans and Monitoring Programs, a number of other plans and strategies are required during construction under the NSW and Federal approvals, and Environmental Assessment Documentation. The Project Staging Report, developed in accordance with NSW CoA A14, provides the applicability of these plans and strategies to the PLR2 – EW and allocates the party responsible for its development.

With the agreement of the Planning Secretary, in accordance with NSW CoA A19, TfNSW and/or John Holland may submit any strategies, plans or programs required by the Infrastructure Approval on a progressive basis, and without undertaking all the consultation required under the applicable condition, noting that:

- While a strategy, plan or program may be submitted on a progressive basis, the TfNSW and John Holland (as relevant) must ensure that the activities on site are covered by suitable strategies, plans or programs at all times





- If a strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the specific stage / activities to which strategy, plan or program applies, the relationship of this stage / activity to future stages / activities, and the trigger for updating the strategy, plan or program.

### 3.3.3. Environmental Work Method Statements

Environmental Work Method Statements (EWMS) will be prepared to manage and control high risk activities that have the potential to negatively impact on the environment. EWMS will be prepared by the Environment and Sustainability Manager (or delegate) in consultation with TfNSW, ER and other relevant authorities (such as the EPA, SOPA, and DPIRD Fisheries) before the commencement of the construction activities to which they apply.

EWMS incorporate appropriate mitigation measures and controls, including those identified in the relevant Sub-plans. They also identify key activity specific procedures to be implemented concurrently with the EWMS. EWMS are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simple written instructions. A template EWMS is provided in Appendix A6.

As a minimum, EWMS will be prepared for the following activities:

- Works in waterways and intertidal area
- Clearing and grubbing
- Management of biosecurity
- Areas of heritage salvage which are potentially contaminated.

EWMS are to be developed in consultation with the relevant construction personnel to ensure that all issues are addressed, methods and activities are practical and all construction personnel, including sub-contractors are aware of their commitments and responsibilities. The Environment and Sustainability Manager will review each EWMS prior to submitting it to the appropriate regulatory authority, the ER and TfNSW for review prior to the commencement of the work activities referred to in the EWMS. EWMS may be submitted progressively to suit the construction stages.

For high-risk activities, EWMS are to be provided to the appropriate regulatory authority(ies) for review and comment.

All construction personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS as detailed in Section 5.3, and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections and auditing of compliance with the EWMS will be undertaken by Project management, quality and environmental personnel, as outlined in Section 7, to ensure that all controls are being followed and properly implemented, to ensure its effectiveness and that any non-compliances are recorded and corrective actions implemented. Where appropriate, improvements will be incorporated following reviews as described in Sections 1.9 and Section 7.7. If there are any changes to the EWMS, the appropriate regulatory authority, ER and TfNSW are to be advised of any proposed changes before the changed work method is adopted.

### 3.3.4. Environmental Control Maps

Environmental Control Maps (ECMs) provide a practical translation of environmental risks and controls for construction personnel. ECMs are to be specific to a work area and/or work activity and identify the sensitive environmental areas and receivers and the location of mitigation measures to minimise the impact of construction activities on the environment and community.

In accordance with the requirements of the *Environmental Control Map Guideline* (EMF-EM-GD-0148) (TfNSW, 2023), ECMs must include details of:

- Where environmental controls are located and how they are used
- Where and when environmental monitoring is to occur







- How environmental control measures are communicated to construction personnel.

ECMs will be prepared progressively in the lead up to and throughout construction in consultation with relevant members of the construction team. Each ECM must be prepared as a map(s) suitable for use by all construction personnel. ECMs are to be submitted to the ER, Acoustic Advisor and Social Advisor for review at least one week prior to the commencement of any activities in the area covered by the ECM(s). Any comments made by the ER, Acoustic Advisor and Social Advisor will be addressed and endorsement obtained prior to commencement of works.

All construction personnel, including subcontractors, undertaking a task governed by an ECM must participate in training on the ECMs and acknowledge that they have read and understood their obligations prior to commencing work.

ECM(s) are to be updated to incorporate works progression and changing site characteristics, and revise or amend environmental protection measures if those identified in the ECMs are not adequate in achieving compliance with the environmental obligations under this CEMP. Revised ECM(s) are to be submitted to the ER for review and endorsement unless otherwise agreed with the ER.

Regular monitoring, inspections and auditing of compliance will be undertaken by John Holland management and environmental personnel to ensure that ECMs are adequately implemented. Matters of non-compliance will be managed in accordance with Section 7.3.

### 3.3.5. Procedures, forms and other documents

The ESMS procedures, forms and other documents provide instructions and records related to both environmental and non-environmental activities throughout the delivery of PLR2 – EW. Where applicable, existing procedures and work instructions from the John Holland ESMS will be applied or amended for use on PLR2 – EW.

### 3.3.6. Environment and Sustainability Design Review

An environment and sustainability design review process has been established by John Holland to ensure design documentation complies with the NSW and Federal approvals, Environmental Assessment Documentation, and contractual requirements. The key output of this review process, the Environment and Sustainability Design Review Report, is to include:

- Processes used to complete the review of the design documentation
- Evidence as to how environmental, sustainability and planning constraints have been considered and how opportunities to avoid or reduce impacts have been realised or justification as to why this was not achievable
- Demonstration that the design documentation complies with the NSW and Federal approvals, Environmental Assessment Documentation, and contractual requirements
- Where sustainability and resilience measures have been incorporated into design documentation
- Identification and consideration of feasible and reasonable opportunities for Aboriginal and non-Aboriginal heritage interpretation, and for the promotion of significant environmental features and sites compliant with the NSW and Federal approvals, Environmental Assessment Documentation and contractual requirements.

Design assurance frameworks will be used to allocate requirements to the appropriate design packages, nominate the design stage for design verification for each requirement, and nominate the verification method for each requirement. These design assurance frameworks are separate to the Compliance Tracking Program which is detailed in Section 7.3.5.







## 4. Planning

### 4.1. Environmental aspects and impacts

In accordance with NSW CoA C10(c), an initial risk assessment for activities attributable to the PLR2 – EW has been developed as part of the CEMF. This initial risk assessment and the outcomes of the Environmental Risk and Opportunities Workshop (Section 4.1.1) have informed the development of this CEMP and associated Sub-plans.

Where relevant, the requirements from the NSW and Federal approvals, Environmental Assessment Documentation, CEMF, TfNSW and industry guidelines, EPL (where obtained) and the Infrastructure Sustainability Council will be incorporated into the environmental risk assessment processes, particularly in developing the agreed activity specific site controls.

Environmental aspects and potential impacts associated with construction of the PLR2 – EW are identified in Table 9.

*Table 9 – Environmental aspects and potential impacts associated with construction*

Environmental aspect	Potential impact
<b>Traffic and access</b>	<ul style="list-style-type: none"> <li>High numbers of construction vehicle movements may temporarily affect the surrounding road network, particularly heavy vehicles</li> <li>Site traffic resulting in changes/disruptions to local traffic movements and/or parking</li> <li>Traffic-related safety incidents during work (workers and road users) if management measures are not adequately implemented.</li> </ul>
<b>Marine works and navigation</b>	<ul style="list-style-type: none"> <li>Barge and boat movements which may temporarily affect access to parts of the Parramatta River</li> <li>Short term closure of the Parramatta River waterway upstream of the proposed bridge crossing during key construction activities</li> <li>Construction works in the intertidal areas.</li> </ul>
<b>Noise and vibration</b>	<ul style="list-style-type: none"> <li>Vibration impacts to sensitive receivers (including utilities and heritage items)</li> <li>Road traffic noise impacts to sensitive receivers due to vehicle movements/haulage routes</li> <li>Noise impacts to sensitive receivers associated with physical works and type of plant and equipment proposed.</li> </ul>
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>Direct removal of native vegetation, threatened ecological communities and habitat for threatened fauna species (such as the Green and Golden Bell Frog)</li> <li>Indirect impact to native vegetation and threatened plant species through edge effects</li> <li>Removal of fauna habitats, including bushland, riparian, native, and exotic grasslands</li> <li>Noise, vibration and lighting impacts to fauna.</li> </ul>
<b>Non-Aboriginal and Aboriginal heritage</b>	<ul style="list-style-type: none"> <li>Direct impacts to Aboriginal sites</li> <li>Impact on heritage items, including the former Ermington Wharf</li> <li>Unexpected impacts on unknown heritage items (e.g. archaeological items) during work.</li> </ul>
<b>Soils and water</b>	<ul style="list-style-type: none"> <li>Erosion of soils potentially resulting in offsite sedimentation</li> <li>Potential interaction with groundwater</li> <li>Potential disturbance, handling and disposal of contaminated materials.</li> </ul>





Environmental aspect	Potential impact
<b>Flooding</b>	<ul style="list-style-type: none"> <li>▪ Potential impacts on construction activities due to flooding.</li> </ul>
<b>Air quality</b>	<ul style="list-style-type: none"> <li>▪ Dust associated with excavation including from exposed surfaces, spoil stockpiles or backfilling trenches</li> <li>▪ Potential release of odours and landfill gas during construction affecting amenity</li> <li>▪ Exhaust emissions from equipment, machinery and construction vehicles.</li> </ul>
<b>Socio-economic, land use and property</b>	<ul style="list-style-type: none"> <li>▪ Direct and indirect impacts on properties</li> <li>▪ Changes to property access</li> <li>▪ Construction and operation footprints impact urban residential land and businesses</li> <li>▪ Changes to, or requirements for, easement arrangements for utilities.</li> </ul>
<b>Landscape character and visual amenity</b>	<ul style="list-style-type: none"> <li>▪ Minor and temporary adverse visual and landscape character impacts during work on site which primarily relate to residential receivers</li> <li>▪ Tree and vegetation removal</li> <li>▪ Visibility or overshadowing of temporary and permanent structures</li> <li>▪ Visibility of ancillary facilities, including construction machinery, plant operations and site offices, hoardings, temporary noise barriers</li> <li>▪ Temporary lighting during out of hours works.</li> </ul>
<b>Hazard and risk</b>	<ul style="list-style-type: none"> <li>▪ Transport and storage of hazardous substances and dangerous goods</li> <li>▪ Potential strikes of existing underground utilities</li> <li>▪ Potential asbestos containing material finds during excavation.</li> </ul>
<b>Resource use and waste management</b>	<ul style="list-style-type: none"> <li>▪ Increased demand on water supply for dust suppression during works</li> <li>▪ Impacts associated with unexpected waste volume or types.</li> </ul>
<b>Sustainability</b>	<ul style="list-style-type: none"> <li>▪ Emissions of greenhouse gases as a result of construction activities.</li> </ul>
<b>Cumulative impacts</b>	<ul style="list-style-type: none"> <li>▪ Noise, amenity and traffic related impacts associated with other construction sites in proximity to the works.</li> </ul>

#### 4.1.1. Environmental Risk and Opportunities Workshop

An Environmental Risk and Opportunities Workshop was held on 8 November 2024 prior to construction. Participants invited to attend the workshop included representatives from:

- John Holland site management and environmental personnel
- The ER
- TfNSW
- NSW EPA
- NSW Department of Planning, Housing and Infrastructure (the Department)<sup>1</sup>
- SOPA

<sup>1</sup> The Department advised that it does not attend risk workshops as a matter of policy





- City of Parramatta Council
- NSW Heritage.

The Environmental Risk and Opportunities Workshop identified high risk activities for the PLR2 – EW with inputs provided from the key stakeholders.

Each risk was assessed to identify the associated environmental hazards, initial risk levels, mitigation measures and residual risks. The outcomes of the Environmental Risk and Opportunities Workshop have been incorporated in the development of this CEMP, Sub-plans and Monitoring Programs, and will be used to inform other environmental management documents to be developed during construction (e.g. EWMS).

The Environmental Risk and Opportunities Workshop was also used to raise general awareness of good environmental management practices and site-specific issues among the John Holland construction team, and to develop ideas and actions to improve environmental performance.

#### 4.1.2. Ongoing risk analysis

The Environment and Sustainability Manager is responsible for ensuring that initial environmental and social risks associated with the PLR2 – EW, as identified in the CEMF, are identified and managed through an Aspects and Impacts Register with appropriate mitigation measures identified and implemented throughout construction.

The Environment and Sustainability Manager will review and, if necessary, update the Aspects and Impacts Register on an ongoing process, including, as a minimum, when:

- A new risk has been identified
- There is a change in work systems, materials, equipment, practices or procedures on site
- There is a reportable incident or non-compliance
- New information about an environmental risk becomes available or where personnel raise concerns about the proposed management of an environmental risk
- At regularly scheduled times, including during CEMP Annual reviews, and at management review meetings (Section 7.7) to inform the need to update environmental management documents.

Where new risks are identified, these will be included in the risk register, assessed and control measures established to eliminate or minimise the level of risk. Monitoring and review of the effectiveness of control measures will be carried out during weekly environmental inspections and may include consultation with construction personnel involved in managing the identified risks. Where required, the CEMP will also be reviewed and updated as required in accordance with the CEMP revision process outlined in Section 1.9.

## 4.2. Relevant legislation and guidelines

In accordance with NSW CoA A7, references in the terms of this Plan to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in at the date of the Infrastructure Approval (CSSI-10035).

### 4.2.1. Approvals, permits and licences

In accordance with NSW CoA A5, John Holland and its sub-contractors will comply with all written requirements or directions of the Planning Secretary. A number of approvals, permits and licenses have and/or will be obtained for the PLR2 – EW. The following approvals and licences have been obtained by TfNSW which are applicable to the PLR2 – EW:

- Infrastructure Approval under Part 5, Division 5.2 of the EP&A Act – SSI-10035 granted by the Minister for Planning on 22 February 2024
- A Commonwealth controlled action approval from the Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW) under Part 8 of the EPBC Act – EPBC 2022/09300 granted by the Minister for Environment and Water on 19 April 2024.





In accordance with NSW CoA A6 and EPBC CoA 16, the NSW and Federal Approvals will lapse after five years from the approval date, unless work physically commences on or before that date.

The following licences, approvals or exemptions will be obtained by John Holland, as necessary:

- An Environmental Protection Licence (EPL) under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) may be required. While the PLR2 – EW in isolation does not trigger the need for an EPL, the EPA may determine that an EPL is required as it forms part of the wider PLR Stage 2 which does meet the thresholds under Schedule 1. The need for an EPL is currently being discussed with the EPA
- Road Occupancy Licences for State and regional roads; and/or road opening permits for local roads under the *Roads Act 1993* from the relevant road authority or council as relevant
- Section 18(1) of the *Marine Safety Act 1998* provides that aquatic activities (i.e. an activity that is conducted in or on navigable waters and that restricts the availability of those waters for normal use by the public) are subject to the licensing requirements of clause 97 of the Marine Safety Regulation 2016. Construction of the proposed bridge over the Parramatta River is defined as an aquatic activity for the purposes of the Marine Safety Act and a licence would be required
- An aquifer interference approval under the *Water Management Act 2000* if construction requires intersection of a groundwater source. It is understood that a person can take up to 3 megalitres of groundwater through an aquifer interference activity per authorised project per water year without needing to obtain a water access licence
- Exemptions to allow hot works to be undertaken on Total Fire Ban days as detailed under Section 99 of the *Rural Fires Act 1997*
- Specific Resource Recovery Exemptions, where determined
- To undertake prescribed activities involving environmentally hazardous chemicals or declared chemical wastes, as detailed under s28 of *Environmentally Hazardous Chemicals Act 1985*
- For construction or use of ‘work’ for purposes including the taking and using of water, as detailed under Section 21B of the *Water Act 1912*.

All necessary licences, permits and approvals required for the development of the PLR2 – EW will be obtained and maintained as required throughout construction. No condition of the Infrastructure Approval removes the obligation for TfNSW or John Holland to obtain, renew or comply with such necessary licences, permits or approvals except as provided under Section 5.23 of the EP&A Act.

#### 4.2.2. Legislation

The relevant legal requirements for the PLR2 – EW, including environment and social obligations, are contained within the aspect specific Sub-plans, Monitoring Programs or the Social Impact Management Plan (UMM SE4) which have been developed to address these requirements. A summary of the relevant applicable legislation is provided in Table 10.

The relevant legal requirements will be reviewed at regular intervals, such as during management reviews (Section 7.7) and in response, the CEMP, Sub-plans and Monitoring Programs will be updated with any applicable changes (Section 1.9). Any changes made to the legal requirements of the PLR2 – EW will be communicated to the wider John Holland project team, including sub-contractors, where necessary through toolbox talks, specific training and other methods detailed in Section 5.3.2.

Table 10 – Relevant legislation

Legislation	Key requirements and relevance to the PLR2 – EW
<b>Biodiversity Conservation Act 2016</b>	The purpose of this Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainability development.







Legislation	Key requirements and relevance to the PLR2 – EW
	Under the provisions of Section 5.23(3) of the EP&A Act, directions, Orders or Notices that could otherwise be issued under Part 11 of the <i>Biodiversity Conservation Act 2016</i> cannot be issued for approved CSSI projects.
<b>Contaminated Land Management Act 1997 (CLM Act)</b>	Contaminated land impacted by the PLR2 – EW must be assessed and managed in accordance with the CLM Act.
<b>Dangerous Goods (Road and Rail Transport) Act 2008</b>	The <i>Dangerous Goods (Road and Rail Transport) Act 2008</i> ensures that dangerous goods are transported in a safe manner. The transporter of Dangerous Goods is required to be appropriately licenced (both vehicle and driver). Depending on the quantities being transported, the Act outlines specific requirements for including appropriate placards on the transport vehicle, emergency procedures, personal protective equipment, manifest documentation and fire extinguishers.
<b>Disability Discrimination Act 1992</b>	The <i>Disability Discrimination Act 1992</i> establishes minimum accessibility requirements to be met by providers and operations of public transport conveyances, infrastructure and premises. The PLR2 – EW will be designed to be compliant with the requirements of the <i>Disability Discrimination Act 1992</i> .
<b>Disability Standards for Accessible Public Transport 2002</b>	The <i>Disability Standards for Accessible Public Transport 2002</i> establishes minimum accessibility requirements to be met by providers and operators of public transport conveyances, infrastructure and premises. The PLR2 – EW will be designed to be compliant with the requirements of the <i>Disability Standards for Accessible Public Transport 2002</i> .
<b>Environmental Planning and Assessment Act 1997 (EP&amp;A Act)</b>	<p>The EP&amp;A Act is the primary land use planning statute in NSW. It governs matters such as planning administration, planning instruments, development assessments, building certification, infrastructure finance, appeals and enforcement.</p> <p>This Project was approved by the Minister for Planning on 22 February 2024 under Section 5.19 of the EP&amp;A Act. Relevant conditions of the Infrastructure Approval are detailed in Section 1.4 and Appendix A1.</p>
<b>Fisheries Management Act 1994</b>	Under the provisions of Section 5.23(1) of the EP&A Act, permits that would otherwise be required under sections 201, 205 and 219 of the <i>Fisheries Management Act 1994</i> are not required for approved CSSI projects. Similarly, under the provisions of Section 5.23(3) of the EP&A Act, directions, orders or notices that could otherwise be issued under Division 7 of Part 7A of the <i>Fisheries Management Act 1994</i> cannot be issued for approved CSSI projects.
<b>Heritage Act 1977</b>	<p>Under the provisions of Sections 5.23(1) and 5.23(2) of the EP&amp;A Act, an approval under Part 4, or an excavation permit under Section 139 of the <i>Heritage Act 1977</i> do not apply to approved CSSI projects. In addition, Division 8 of Part 6 of the <i>Heritage Act 1977</i> does not apply to prevent or interfere with the carrying out of approved CSSI projects.</p> <p>Risks to heritage during PLR2 – EW will be managed in accordance with the HMP.</p>
<b>National Greenhouse and Energy Reporting (NGER) Act 2007 (Cth)</b>	The NGER Act provides data and accounting obligations in relation to greenhouse gas emissions, energy consumption, and energy production. John Holland will undertake reporting of greenhouse gas emissions and energy production and consumption under the NGER Act, inclusive of 'material' Subcontractors.
<b>National Parks and Wildlife Act 1974</b>	Under the provisions of Sections 5.23(1) and 5.23(3) of the EP&A Act, permits under section 90 of the <i>National Parks and Wildlife Act 1974</i> and orders and directions pursuant





Legislation	Key requirements and relevance to the PLR2 – EW
	to Part 6A are not applicable to approved CSSI projects. In response to identified Aboriginal heritage impacts, management and mitigation measures are detailed in the HMP.
<b>Protection of the Environment Operations Act 1997</b>	The POEO Act is a key piece of environmental protection legislation in NSW. In addition to defining licencing requirements (Section 4.2.1), the POEO Act establishes the environmental protection framework for pollution (air, water and land), noise emissions, and waste management. POEO Act obligations and management measures are captured in relevant Sub-plans. Pollution event notification requirements are detailed in Section 6.
<b>Roads Act 1993</b>	The <i>Roads Act 1993</i> requires consent to be obtained from the appropriate road authority for the erection of a structure or the carrying out of works in, on or over a public road, or the digging up or the disturbance of the surface of a public road. The requirements of this Act are detailed in Section 4.2.1 and the CTTAMP.
<b>Waste Avoidance and Resource Recovery Act 2001</b>	This Act aims to encourage the most efficient use of resources to reduce environmental harm in accordance with the principles of ecologically sustainable development. Waste avoidance and resource recovery measures are detailed in the WMP.
<b>Water Management Act 2000</b>	The objective of this Act is to provide for the sustainable and integrated management of the water sources of the State for the benefit of both present and future generations.  Section 5.23(1)(g) of the EP&A Act provides for the exemption of SSI projects from requiring a water use approval, a water management approval or an activity approval (other than an aquifer interference approval).

#### 4.2.3. Guidelines and standards

The main guidelines, specifications, and policy documents relevant to this Plan include:

- AS/NZS 1158-2022: Lighting for Roads and Public Spaces
- AS/NZS 4282-2019: Control of the obtrusive effects of outdoor lighting
- AS/NZS 4801-2001: Safety Management Systems.
- AS/NZS ISO 14001-2016: Environmental Management Systems (EMS)
- AS/NZS ISO 19011-2014: Guidelines for Auditing Management Systems
- AS/NZS ISO 9001-2015: Quality Management Systems
- Central City District Plan (Greater Sydney Commission, 2018)
- *Community Infrastructure Strategy* (City of Parramatta, 2020)
- *Environmental Management Plan Guideline – Guideline for Infrastructure Projects* (DPE, 2020)
- *Guideline for the Preparation of Environmental Management Plans* (DIPNR, 2004)
- *Greater Sydney Region Plan – A Metropolis of Three Cities* (Greater Sydney Commission, 2018)
- Interim Construction Noise Guideline (DECC, 2009)
- *Managing Urban Stormwater: Soils and Construction Volume 1*, Landcom, (4th Edition) March 2004 (reprinted 2006) (the “Blue Book”).
- *National Light Pollution Guidelines for Wildlife* (AG DCCEEW, 2023).
- *Technical Manual, Design and As-Built* (Infrastructure Sustainability Rating Scheme, Version 2.1, 2021)
- TfNSW Environment and Sustainability Policy (January, 2020)
- TfNSW guidelines:





- Air Quality Management Guideline (EMF-AQ-GD-0063)
- Chemical Storage and Spill Response Guidelines (EMF-EM-GD-0137)
- Concrete Washout Guidelines (DMS-SD-112)
- Construction Noise and Vibration Strategy (TfNSW, 2019) (CNVS)
- Environmental Control Map Guideline (EMF-EM-GD-0148)
- Fauna Management Guideline (DMS-SD-113)
- Non-road diesel plant data collection workbook (EMF-AQ-TT-0062)
- Pesticide use notification plan (EMF-BP-PS-0095)
- Procedure for Aboriginal cultural heritage consultation and investigation (RMS 11.012-SBN 9781922040183)
- Unexpected Heritage Items Procedure (EMF-HE-R-0076)
- Vegetation Management (Protection and Removal) Guideline (DMS-SD-111)
- Water Discharge and Reuse Guideline (DMS-SD-024)
- Water Sensitive Urban Design Guideline (DMS-SD-106)
- Weed Management and Disposal Guideline (DMS-SD-110)
- Woo-La-Ra Triangle Transport Landfill Site Remediation Action Plan (TfNSW, 2024).

Relevant guidelines and standards will vary for each aspect specific Sub-plan. Specific guidelines and standards are included within Section 2 of each Sub-plan.

In accordance with NSW CoA A7, references in the terms of the Infrastructure Approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of the Infrastructure Approval, unless otherwise approved or required by the Planning Secretary.

### 4.3. Environmental and sustainability objectives and targets

The proposed Parramatta Light Rail network, including PLR Stage 2, is a critical component of the GPOP which was first identified as a priority growth area in the 2014 metropolitan strategy *A Plan for Growing Sydney* (NSW Government, 2014). The GPOP is undergoing a major transformation, with significant investment in urban renewal, employment, education and cultural infrastructure.

The aim of the Parramatta Light Rail network is to deliver an integrated light rail service that supports the NSW Government's vision for the GPOP, which is to become the geographic and demographic centre of Greater Sydney: 'Greater Sydney's true centre – the connected unifying heart' (Greater Sydney Commission, 2016).

To achieve this aim, the objectives for Parramatta Light Rail network (including PLR Stage 2) are defined according to four categories:

1. **City Shaping** – Support the vision for Parramatta as a 21<sup>st</sup> century city – attract new investment and economic development. A catalyst for shaping new growth, activate underutilised land, and provide transport capacity needed to support sustainable population and employment growth
2. **Transport connectivity** – Connect people and places – support the diverse mix of customer journeys that link employment, cultural, educational, health and supporting precincts with existing and new communities
3. **Transport choice** – Provide attractive transport choices for customers – deliver a turn-up and go, safe, reliable, all-day light rail service that is integrated with roads, buses, trains and active transport
4. **Place making** – Contribute to the creation of local hubs – support the creation of attractive and memorable public spaces that are better utilised by communities.





PLR Stage 2 will improve connectivity across the GPOP by providing:

- Two new public and active transport river crossings to connect north and south of Parramatta River
- Frequent and reliable light rail services within the Central River City
- New active transport links and connections to existing routes
- Integration with other transport facilities and modes, including Parramatta Light Rail Stage 1, Sydney Metro West, train, ferry and bus routes.

PLR Stage 2 will improve transport choice and accessibility, attracting people away from the use of cars and reducing congestion. The provision of about 8.5 kilometres of new active transport connects stops and provides links to existing cycle routes and key destinations. PLR Stage 2 complements the existing transport network, and other proposed network and active transport improvements, to support growth and respond to the growing travel demands within and beyond the GPOP.

Environmental and sustainability objectives and targets have been established as a means of assessing environmental and sustainability performance during construction of the PLR Stage 2, including PLR2 – EW. These objectives and targets have been developed with consideration of the key issues identified through the environmental assessment and risk assessment processes. The objectives and targets are consistent with TfNSW's and the John Holland's environment and sustainability policies and will assist in monitoring whether the policy commitments are being met.

The performance of the PLR2 – EW will be monitored against the PLR Stage 2 objectives and targets and documented in the Compliance Tracking Program which will be updated progressively (Section 7.3.5) and as part of management reviews (Section 7.7).

Environmental and sustainability objectives and targets for the PLR2 – EW have been incorporated into aspect specific Sub-plans. The John Holland Project Director and Environment and Sustainability Manager are responsible for ensuring that these objectives and targets are achieved for PLR2 – EW. A summary of the environmental and sustainability objectives, targets and key performance indicators relevant to this Plan are detailed in Table 11.

Table 11 – Environmental and Sustainability objectives, targets and key performance indicators

Objectives	Targets	Key Performance Outcomes
<b>Construct in accordance with environmental approvals</b>	<ul style="list-style-type: none"> <li>▪ Full compliance with statutory approvals</li> </ul>	<ul style="list-style-type: none"> <li>▪ Number of breaches or regulatory infringements</li> </ul>
<b>Compliance with all legal requirements</b>	<ul style="list-style-type: none"> <li>▪ No regulatory infringements (penalty infringement notices or prosecutions)</li> <li>▪ No formal regulatory warning</li> </ul>	<ul style="list-style-type: none"> <li>▪ Number of breaches or regulatory infringements</li> </ul>
<b>Implement a rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001</b>	<ul style="list-style-type: none"> <li>▪ Address non-compliances and corrective actions within specific timeframes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Percentage of non-compliances and corrective actions closed within specific timeframes</li> </ul>
<b>Respond to site inspection reports in a timely manner</b>	<ul style="list-style-type: none"> <li>▪ Close all actions or environmental improvements within agreed timeframes unless otherwise agreed with TfNSW or the ER</li> </ul>	<ul style="list-style-type: none"> <li>▪ Percentage of actions and improvements closed within agreed timeframes</li> </ul>
<b>Retention of trees</b>	<ul style="list-style-type: none"> <li>▪ Trees located outside of the Permanent Light Rail Corridor retained where there are nil operational or safety related impacts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reduction in tree removals and maximise tree retention.</li> </ul>
<b>Implement sustainability initiatives</b>	<ul style="list-style-type: none"> <li>▪ Achieve a minimum 'Silver' ISC Design and As Built Rating</li> </ul>	<ul style="list-style-type: none"> <li>▪ Measure, monitor and report on the implementation of the sustainability initiatives identified in the</li> </ul>





Objectives	Targets	Key Performance Outcomes
	<ul style="list-style-type: none"> <li>Adopt sustainability leadership and continual improvement</li> <li>Integrate governance, environmental, social and economic considerations into decision-making processes within PLR2 – EW</li> <li>Enhance positive environmental, social and economic outcomes wherever possible, while minimising adverse impacts, resource use and embodied impacts</li> <li>Achieve a minimum 'Excellent' ISC As-Built Rating</li> </ul>	<p>Construction Sustainability Management Plan</p> <ul style="list-style-type: none"> <li>Utilise ISC IS rating tool v2.1 to evaluate sustainability performance of the quadruple bottom line (i.e. governance / environmental / economic / social) of PLR2 – EW.</li> </ul>



## 5. Implementation

### 5.1. Resources, roles, responsibilities and authorities

This section details the roles and responsibilities of environmental personnel, including wider John Holland team members, TfNSW, the ER, Acoustics Advisor (AA), Independent Arborist (IA) and Social Advisor. The organisational structure of these roles for the PLR2 – EW is shown in Figure 7.

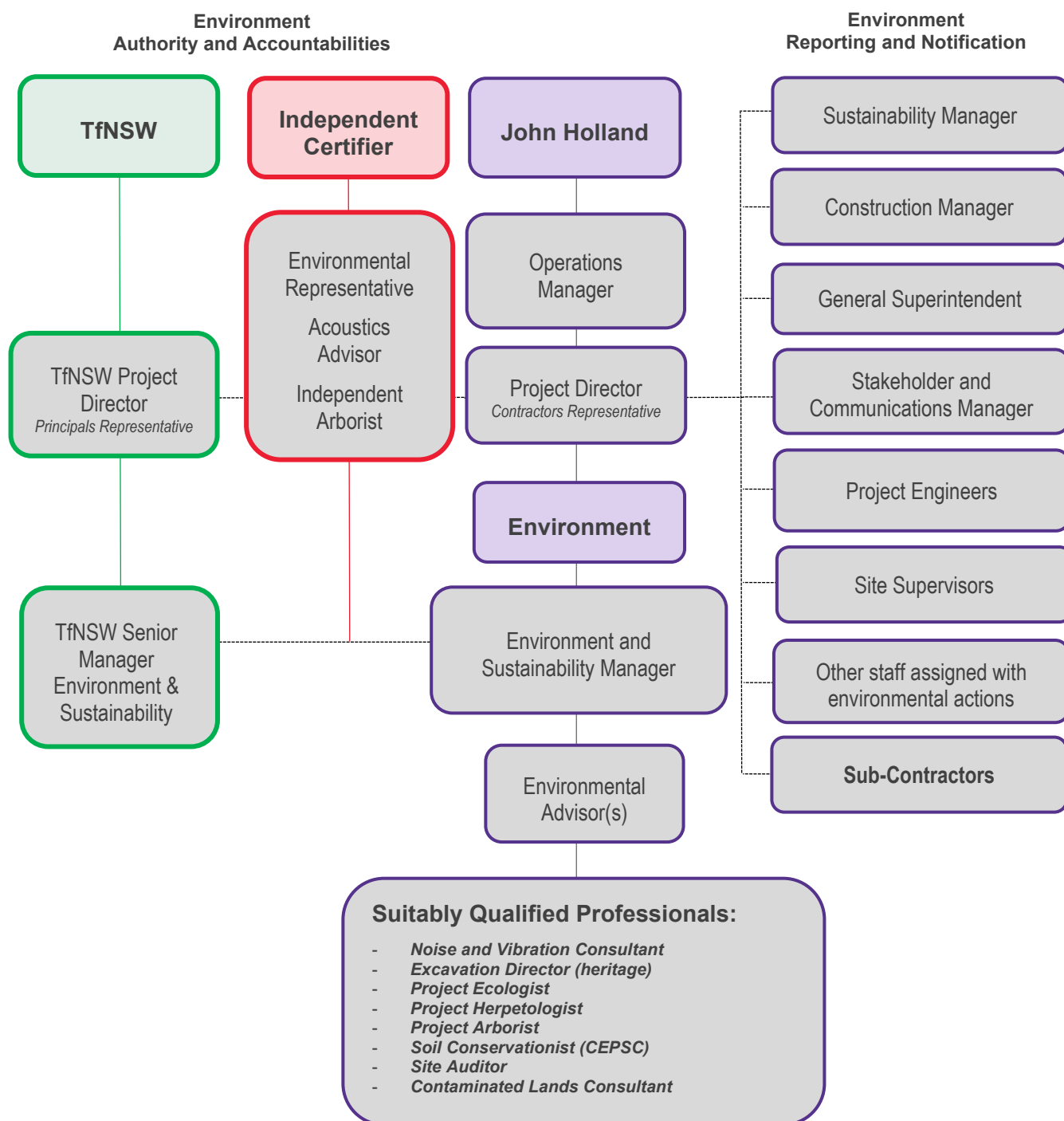


Figure 7 – PLR2 – EW Organisation structure for environment and sustainability management



## 5.1.1. John Holland key personnel

### 5.1.1.1. Environment and Sustainability Manager

As a member of the Operational Leadership Team, the Environment and Sustainability Manager is accountable for the environmental and sustainability performance of the PLR2 – EW and the implementation and effectiveness of environmental control measures. The key authorities, responsibilities and lines of communication associated with this role are detailed in Table 12.

Table 12 – Environment and Sustainability Manager

Environment and Sustainability Manager	
<b>Authority</b>	<ul style="list-style-type: none"> <li>▪ Appointed by the Project Director and works closely with the construction and safety teams</li> <li>▪ Authorised to collaborate and develop documentation necessary for approvals, and environmental and sustainability management</li> <li>▪ Authorised contact person for communications with TfNSW and the EPA on all environmental matters</li> <li>▪ Authorised to take immediate action to shut down any activity, or to effect any pollution control measure, as directed by TfNSW, an authorised officer of the EPA or other relevant agencies</li> <li>▪ All correspondence and documentation that has legal, commercial or contractual impact shall be viewed and agreed upon, by the Project Director.</li> </ul>
<b>Responsibility</b>	<ul style="list-style-type: none"> <li>▪ Overall responsibility for implementation of environmental mitigation on PLR2 – EW</li> <li>▪ Oversees the successful implementation of this CEMP, Sub-plans and Monitoring Programs</li> <li>▪ Development, implementation, monitoring and updating of the CEMP and Sub-plans in accordance with ISO14001</li> <li>▪ Reports to the Project Director on the performance and implementation of this CEMP</li> <li>▪ Ensures management reviews of the CEMP are undertaken annually, documented and actions implemented</li> <li>▪ Ensures environmental risks of the PLR2 – EW are identified and reviewed throughout construction, with appropriate mitigation measures implemented to control the risks</li> <li>▪ Identifies where environmental measures are not meeting the targets set in this CEMP and where improvement can be achieved</li> <li>▪ Ensures environmental protocols are in place and managed</li> <li>▪ Ensures environmental compliance with NSW and Federal approvals, the Environmental Assessment Documentation, CEMP and environmental management plans</li> <li>▪ Obtains and updates all environmental licences, approvals and permits as required</li> <li>▪ Liaises with the ER, AA, IA, Social Advisor, TfNSW Environment team and approval authorities</li> <li>▪ Works collaboratively with the Sustainability Manager (or delegate) to deliver the sustainability objectives, targets and requirements for the PLR2 – EW</li> <li>▪ Manages environmental document control, reporting, inductions and training</li> <li>▪ Manages environmental reporting within John Holland, to TfNSW and regulatory authorities</li> <li>▪ Oversees site monitoring activities, site inspections, audits and site checklists</li> <li>▪ Ensures monitoring records are appropriately maintained, reviewed and any non-compliance issues addressed</li> </ul>







## Environment and Sustainability Manager

	<ul style="list-style-type: none"> <li>Records and provides written reports to the Construction Manager of non-compliances or corrective actions with the CEMP and Sub-plans (refer to Section 7.3.1). This may include the need to implement additional, or revise existing, mitigation measures</li> <li>Provides reports to the Project Director on any major issues resulting from the PLR2 – EW</li> <li>Assists all site staff with issues concerning PLR2 – EW environmental matters</li> <li>Manages all sub-contractors and consultants with regards to environmental matters, including assessing environmental capabilities and overseeing submission of relevant environmental documents and reports</li> <li>Develops and facilitates inductions, toolbox talks, environment awareness notes and other training programs regarding environmental requirements for all construction personnel</li> <li>Notifies TfNSW and relevant authorities in the event of an environmental incident or non-compliance and manages close-out of these</li> <li>Stops activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-compliances, and advises the Project Director, Construction Manager and Superintendent</li> <li>Assists the Stakeholder and Communications Manager to resolve environment-related complaints</li> <li>Develops, reviews and approves EWMS in consultation with the Superintendent, Project Engineers, Foreman / Site Supervisors and other relevant site personnel, as required</li> <li>Manages the day-to-day environmental elements of construction.</li> </ul>
<b>Lines of communication</b>	<ul style="list-style-type: none"> <li>Member of the Operational Leadership Team</li> <li>Primary contact on environmental and sustainability matters to TfNSW, the ER and the AA</li> <li>Primary government agency contact for planning approval and environmental management.</li> </ul>

### 5.1.1.2. Approvals Manager(s)

The responsibilities of the Approvals Manager(s) are detailed in Table 13.

Table 13 – Approvals Manager(s)

Approvals Manager(s)	
<b>Authority</b>	<ul style="list-style-type: none"> <li>Appointed by the Environment and Sustainability Manager</li> </ul>
<b>Responsibility</b>	<ul style="list-style-type: none"> <li>Assists the Environment and Sustainability Manager in the development and receipt of the necessary approvals during the commencement of construction to allow timely start-up</li> <li>Develops environmental management and approvals documentation</li> <li>Ensures compliance with this Plan, Sub-plans and procedures</li> <li>Work in partnership with construction staff to understand the required environmental approvals to allow the commencement of the construction</li> <li>Assist John Holland staff with environmental approval enquiries</li> <li>Develops ECMs and EWMS in consultation with construction personnel for review by the Environment and Sustainability Manager</li> <li>Liaises with the ER, AA and the TfNSW environment team as requested.</li> </ul>
<b>Lines of communication</b>	<ul style="list-style-type: none"> <li>Functional reporting to the Environment and Sustainability Manager</li> </ul>



Approvals Manager(s)	
	<ul style="list-style-type: none"> <li>▪ Indirect reporting to Project Manager(s).</li> </ul>
Minimum Skill Levels	<ul style="list-style-type: none"> <li>▪ Possess a relevant recognised qualification</li> <li>▪ At least 10 years relevant experience</li> <li>▪ Familiarity with current and emerging environmental issues.</li> </ul>

#### 5.1.1.3. Environmental Advisor(s)

The responsibilities of the Environmental Advisor(s) are detailed in Table 14.

Table 14 – Environmental Advisor(s)

Environmental Co-ordinator(s)	
Authority	<ul style="list-style-type: none"> <li>▪ Appointed by the Environment and Sustainability Manager</li> </ul>
Responsibility	<ul style="list-style-type: none"> <li>▪ Assists the Environment and Sustainability Manager in the day-to-day environmental management of the works</li> <li>▪ Ensures compliance with this CEMP, Sub-plans and procedures</li> <li>▪ Works in partnership with construction personnel to build environmental capabilities, drive cultural change, and achieve performance improvements</li> <li>▪ Assists the Environment and Sustainability Manager in implementing the environmental induction program</li> <li>▪ Develops ECMs and EWMS in consultation with construction personnel for review by the Environment and Sustainability Manager</li> <li>▪ Assists construction personnel with environmental enquiries</li> <li>▪ Assists in the implementation of site environmental controls</li> <li>▪ Conducts environmental monitoring and inspections including with the ER and AA</li> <li>▪ Liaises with the ER, AA and the TfNSW environment team as requested</li> <li>▪ Assist the Environment and Sustainability Manager in audits</li> <li>▪ Assist the Environment and Sustainability Manager in the investigation and close out of any environmental complaints.</li> </ul>
Lines of communication	<ul style="list-style-type: none"> <li>▪ Functional reporting to the Environment and Sustainability Manager</li> <li>▪ Indirect reporting to Project Manager(s).</li> </ul>
Minimum Skill Levels	<ul style="list-style-type: none"> <li>▪ Possess a relevant recognised qualification</li> <li>▪ At least two years relevant experience</li> <li>▪ Familiarity with current and emerging environmental issues.</li> </ul>

#### 5.1.1.4. Suitably Qualified Professionals

The John Holland environment team will be supported by specialist consultants (suitably qualified professionals) to provide technical specialist advise and support during the delivery of the PLR2 – EW. The roles and responsibilities for these suitably qualified professionals are provided in the relevant Sub-plan for each environmental aspect as detailed in Table 15.





Table 15 – Other key roles and responsibilities for environmental management

Role	Responsibilities
Noise and Vibration Consultant	As detailed in the NVMP (Appendix B3).
Excavation Director (heritage)	As detailed in the HMP (Appendix B4).
Project Ecologist	As detailed in the FFMP (Appendix 5).
Project Herpetologist	
Project Arborist	
Soil Conservationist	As detailed in the SWMP (Appendix B6).
Site Auditor	
Contaminated Lands Consultant	

#### 5.1.1.5. Other John Holland key personnel

Other key John Holland personnel with environmental responsibilities are detailed in Table 16.

Table 16 – Other key roles and responsibilities for environmental management

Role	Responsibilities
Project Director	<ul style="list-style-type: none"> <li>Ensures all works complies with relevant regulatory and Project requirements, including compliance with the NSW and Federal approvals, Environmental Assessment Documentation (and UMMs), and EPL (where obtained)</li> <li>Ensures the requirements of the CEMP are fully implemented, and in particular, that environmental requirements are not secondary to other construction requirements</li> <li>Endorses and supports the TfNSW and John Holland environment and sustainability policies</li> <li>Liaises with TfNSW, the ER and other government authorities as required</li> <li>Participates and provides guidance in the regular review of the CEMP and supporting documentation</li> <li>Provides adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of the CEMP</li> <li>Provides adequate resources to ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements</li> <li>Provides adequate resources to ensure that complaints are investigated to ensure effective resolution</li> <li>Stops work immediately if an unacceptable impact on the environment is likely to occur</li> <li>Point of contact in the event of an environmental site emergency</li> <li>24-hour person of contact for environmental regulatory authorities.</li> </ul>
Superintendent	<ul style="list-style-type: none"> <li>Plans construction works in a manner that avoids or minimises impacts to the environment</li> <li>Ensures the requirements of the CEMP and Sub-plans are fully implemented</li> <li>Ensures construction personnel manage construction works in accordance with statutory and approval requirements</li> </ul>



Role	Responsibilities
	<ul style="list-style-type: none"> <li>Supports the Environment and Sustainability Manager in achieving relevant environmental objectives</li> <li>Ensures environmental management procedures and protection measures are implemented</li> <li>Co-ordinates the implementation and maintenance of pollution control measures</li> <li>Identifies resources required for implementation of the CEMP and Sub-plans</li> <li>Ensures all construction personnel attend an induction prior to commencing works</li> <li>Liaises with TfNSW, the ER and government authorities as required</li> <li>Stops work immediately if an unacceptable impact on the environment is likely to occur</li> <li>Reports any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Environment and Sustainability Manager</li> <li>Point of contact in the event of an environmental site emergency</li> <li>24-hour person of contact for environmental regulatory authorities.</li> </ul>
<b>Construction Manager</b>	<ul style="list-style-type: none"> <li>Ensures all construction works comply with relevant regulatory and Project requirements, including compliance with the NSW and Federal approvals, Environmental Assessment Documentation (and UMMs), and EPL (where obtained)</li> <li>Leads the construction staging strategy for the civil infrastructure works to deliver works and minimise disruption to stakeholders</li> <li>Co-ordinates the implementation of this CEMP, EWMS and ECMs</li> <li>Supports the Environment and Sustainability Manager in the development of EWMS / ECMs</li> <li>Approves work procedures for effective minimisation of risk to the environment</li> <li>Ensures sub-contractors and suppliers comply with this CEMP, EWMS and ECMs</li> <li>Ensures that work is carried out in accordance with standards and specifications</li> <li>Liaises with TfNSW, the ER and government authorities as required</li> <li>Co-ordinates action in emergency situations and allocate required resources</li> <li>Stops activities where there is an actual or immediate risk of harm to the environment and advises the Construction Manager and Environment and Sustainability Manager</li> <li>Supports the Environment and Sustainability Manager in achieving relevant environmental objectives, including on ground implementation of the EWMS and ECMs</li> <li>Ensuring all erosion and sediment controls are implemented and maintained.</li> </ul>
<b>Stakeholder and Communications Manager</b>	<ul style="list-style-type: none"> <li>Ensures that all community consultation activities are carried out as per CCS and CEP</li> <li>Reports any environmental issues raised by stakeholders or members of the community to the Environment and Sustainability Manager</li> <li>Communicates construction progress, performance and issues to stakeholders including the community</li> <li>Maintains processes to respond to complaints received via the Community Information Line</li> <li>Maintains complaints register in accordance with the Complaints Management System.</li> <li>Liaises with the ER and AA in relation to community and stakeholder complaints.</li> </ul>
<b>Project Engineers</b>	<ul style="list-style-type: none"> <li>Provides input into the preparation of environmental planning documents as required</li> <li>Ensures that instructions are issued and adequate information provided to design / construction personnel that relate to environmental risks on-site</li> </ul>





Role	Responsibilities
	<ul style="list-style-type: none"> <li>Ensures that the works are carried out in accordance with the requirements of the CEMP, Sub-plans and procedures, including implementation of all environmental controls</li> <li>Identifies any environmental risks</li> <li>Identifies resource needs for implementation of CEMP requirements and related documents</li> <li>Ensures that complaints are investigated for effective resolution</li> <li>Takes action in the event of an emergency and allocates the required resources to minimise environmental and community impacts</li> <li>Reports any activities that have resulted, or have the potential to result, in an environmental incident immediately to Construction Manager / Environment and Sustainability Manager.</li> </ul>
<b>Site Supervisors</b>	<ul style="list-style-type: none"> <li>Undertakes any environmental duties as defined by the Construction Manager or Project/Site Engineers</li> <li>Controls field works and implement/maintain effective environmental controls</li> <li>Where required, conducts environmental risk assessments of works prior to commencement</li> <li>Ensures site activities comply with ECMs / EWMS and relevant records are kept</li> <li>Ensures all site workers are inducted prior to commencement of works</li> <li>Attends to any spills or environmental incidents that may occur on site</li> <li>Reports any activities that have resulted, or have the potential to result, in an environmental incident immediately to the Construction Manager</li> <li>Stops activities where there is an actual or immediate risk of harm and advises the Project Manager, Construction Manager or Environment and Sustainability Manager.</li> </ul>
<b>Project Team (including sub-contractors)</b>	<ul style="list-style-type: none"> <li>Complies with the relevant requirements of this CEMP, Sub-plans and other environmental management guidance as instructed by a member of John Holland management team</li> <li>Participates in the mandatory PLR2 – EW induction program</li> <li>Reports any environmental incidents to the Site Supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident</li> <li>Undertakes remedial action as required to ensure environmental controls are maintained in good working order</li> <li>Stops activities where there is an actual or immediate risk of harm to the environment and advises the Project Manager, Construction Manager, Site Supervisor or Environment and Sustainability Manager.</li> </ul>
<b>Sustainability Manager</b>	<ul style="list-style-type: none"> <li>Develops and implements the Construction Sustainability Management Plan</li> <li>Ensures the development, implementation and verification of sustainability measures is carried out for all construction works</li> <li>Supports Project Manager(s) in achieving sustainability objectives, targets and requirements</li> <li>Manages the Sustainability Induction and Training Program for relevant personnel</li> <li>Ensures relevant sustainability personnel are capable and suitably skilled to undertake designated sustainability responsibilities</li> <li>Assists and supports the Construction Manager to ensure the sub-contractors fulfill sustainability obligations, targets and requirements</li> <li>Monitors progress of sustainability targets and ensure actions are initiated and performed throughout the PLR2 – EW</li> </ul>







Role	Responsibilities
	<ul style="list-style-type: none"> <li>Co-ordinates and prepares sustainability initiative progress reports.</li> </ul>

### 5.1.2. TfNSW roles

Roles and responsibilities of TfNSW personnel, as relevant to the construction of the PLR2 – EW is provided in Table 17.

Table 17 – Key roles and responsibilities of TfNSW personnel on PLR2 - EW

Role	Responsibilities
<b>TfNSW Project Director</b>	<ul style="list-style-type: none"> <li>Evaluates and advises on high-risk compliance issues relating to John Holland and TfNSW environmental requirements</li> <li>Provides John Holland management with environmental advice and/or directions, in consultation with TfNSW environmental staff.</li> </ul>
<b>TfNSW Project Manager(s)</b>	<ul style="list-style-type: none"> <li>Evaluates and advises on compliance with TfNSW environmental requirements</li> <li>Reviews and endorses the CEMP in consultation with TfNSW environmental staff and the ER</li> <li>Provides John Holland staff with environmental advice and/or directions, in consultation with TfNSW environmental team.</li> </ul>
<b>TfNSW Senior Environment and Sustainability Manager</b>	<ul style="list-style-type: none"> <li>Reviews the CEMP and related documents prepared for the PLR2 – EW</li> <li>Reviews and considers project changes / refinements that are consistent with the Environmental Assessment Documentation in accordance with TfNSW guidelines</li> <li>Oversees compliance with relevant requirements of the NSW and Federal approvals and Environmental Assessment Documentation (and UMMs) that have not been passed to John Holland by contract</li> <li>Project point of contact for Planning Secretary and Federal environment department</li> <li>Monitors environmental performance of the PLR2 – EW in relation to TfNSW requirements</li> <li>Provides guidance and where appropriate, monitors compliance with post approval document submission requirements.</li> </ul>

### 5.1.3. Independent appointments

In accordance with the Infrastructure Approval, a number of independent appointments, including independent technical specialists to monitor environmental compliance must be nominated by the proponent and approved by the Planning Secretary prior to the commencement of work. The roles and responsibilities of these key independent appointments for PLR2 – EW are provided in Table 18.

All Independent Appointments required by the Infrastructure Approval must have regard to *Seeking approval from the Department for the appointment of independent experts* (DPIE, 2020) and must hold a current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary. More than one Independent Appointment(s) may be engaged to fulfil these roles.

John Holland will provide all documents, information, assistance and co-operation reasonably requested by any of the Independent Appointments or TfNSW (and within the time requested) to allow the Independent Appointments to carry out their role.

Table 18 – Key roles and responsibilities of independent appointments on PLR2 - EW

Role	Responsibilities
<b>Environmental Representative (ER)</b>	The ER is to meet the requirements of the <i>Environmental Representative Protocol</i> (DPE, Oct 2018) and be a suitably qualified and experienced person(s) who was not involved in the



Role	Responsibilities
	<p>preparation of the Environmental Assessment Documentation, and is independent from design and construction personnel and those involved in the delivery of PLR2 – EW. Work must not commence until the ER has been approved by the Planning Secretary.</p> <p>In accordance with NSW CoA A30, the approved ER must:</p> <ul style="list-style-type: none"> <li>Receive and respond to communication from the Planning Secretary in relation to the environmental performance of the PLR2 – EW</li> <li>Consider and inform the Planning Secretary on matters specified in the terms of the Infrastructure Approval</li> <li>Consider and recommend to TfNSW and John Holland any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and community</li> <li>Review documents identified in NSW CoA A14, C1, C4, C9, C14 and C20 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under the Infrastructure Approval and if so: <ul style="list-style-type: none"> <li>Make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary) or</li> <li>Make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department)</li> </ul> </li> <li>Regularly monitor the implementation of the documents listed in NSW CoA A14, C1, C4, C9, C14 and C20 to ensure implementation is being carried out in accordance with these documents and the terms of the Infrastructure Approval</li> <li>Help plan or attend audits of PLR2 – EW commissioned by the Department, including scoping audits, programming audits, briefings and site visits, as may be requested by the Planning Secretary, but not independent environmental audits under NSW CoA A39</li> <li>Assist in the resolution of community complaints as may be requested by the Planning Secretary</li> <li>Review and determine the appropriateness of any activities reliant on the definition of Low Impact Work; and consider or assess the impacts of minor construction ancillary facilities as required by NSW CoA C7</li> <li>Consider or assess the impacts of minor construction ancillary facilities as required by NSW CoA C7</li> <li>Consider any minor amendments made to the CEMP, Sub-plans and Monitoring Programs, without increasing impacts to nearby sensitive land uses, that comprise updating or are of an administrative nature, and are consistent with the terms of the Infrastructure Approval and the CEMP, Sub-plans and Monitoring Programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of the Infrastructure Approval</li> <li>Prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, an ER Monthly Report providing information as set out in the <i>Environmental Representative Protocol</i>. The ER Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement, except in December which will be within 10 days following the end of the month, or as otherwise agreed by the Planning Secretary.</li> </ul>





Role	Responsibilities
<b>Acoustics Advisor (AA)</b>	<p>The AA is required to be suitably qualified and experienced in noise and vibration management, and independent of the design and construction personnel. Work must not commence until the AA has been approved by the Planning Secretary.</p> <p>In accordance with NSW CoA A35, the approved AA must:</p> <ul style="list-style-type: none"> <li>Receive and respond to communication from the Planning Secretary in relation to the noise and vibration performance of the PLR2 – EW</li> <li>Consider and inform the Planning Secretary on matters specified in the terms of the Infrastructure Approval relating to noise and vibration</li> <li>Consider and recommend to TfNSW and John Holland, improvements that may be made to avoid or minimise adverse noise and vibration impacts</li> <li>Review proposed night-time works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures</li> <li>Review noise and vibration documents required to be prepared under the terms of the Infrastructure Approval (including but not limited to CEMPs, Construction Noise and Vibration Impact Statements (CNVIS) and Out-of-hours-Works, and should they be consistent with the terms of the Infrastructure Approval, endorse them before submission to the Planning Secretary (if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary);</li> <li>Regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of the Infrastructure Approval to ensure implementation is in accordance with what is stated in the document(s) and the NSW CoA.</li> <li>Notify the Planning Secretary of noise and vibration incidents and non-compliances in accordance with NSW CoA A44 and A46</li> <li>In conjunction with the ER, the AA must: <ul style="list-style-type: none"> <li>As may be requested by the Planning Secretary or Community Complaints Mediator, help plan, attend or undertake audits of noise and vibration management of the PLR2 – EW, including briefings, and site visits, in conjunction with the ER</li> <li>In the event that conflict arises between TfNSW, John Holland and the community in relation to the noise and vibration performance of the PLR2 – EW, follow the procedure in the CCS to attempt to resolve the conflict, in conjunction with the ER, and if it cannot be resolved, notify the Planning Secretary</li> <li>Consider relevant minor amendments made to CEMP, relevant Sub-plans and Monitoring programs, in conjunction with the ER, that require updating or are of an administrative nature, and are consistent with the terms of the Infrastructure Approval and the management plans and Monitoring Programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment, (this does not include any modifications to the terms of the Infrastructure Approval)</li> <li>Review the noise impacts of minor ancillary facilities as defined in NSW CoA C7</li> <li>Prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. The Monthly Noise and Vibration Report must be submitted within seven (7) days following the end of each month for the duration of the AA's engagement for the PLR2 – EW, except in December which will be within 10 days following the end of the month, or as otherwise agreed by the Planning Secretary.</li> </ul> </li> </ul>





Role	Responsibilities
<b>Independent Arborist (IA)</b>	<p>An IA, with a minimum Australian Qualifications Framework Level 5 qualification in Arboriculture is to be appointed for the duration of PLR2 – EW. The IA must be independent of design and construction personnel and operate as the principle point of contact relating to impacts on trees.</p> <ul style="list-style-type: none"> <li>▪ Defining what is considered to be ‘damage’ to trees</li> <li>▪ Reviewing the proposed removal or damage to trees</li> <li>▪ Providing recommendations or opinions in the Tree Register developed under NSW CoA E76.</li> </ul>
<b>Community Complaints Mediator</b>	<p>A Community Complaints Mediator that is accredited under the National Mediator Accreditation System administered by the Mediator Standards Board (unless otherwise agreed by the Planning Secretary), and independent of the design and construction personnel, must be engaged for the duration of the Project. The Community Complaints Mediator must be approved by the Planning Secretary before the commencement of work.</p> <p>In accordance with NSW CoA B11, the role of the Community Complaints Mediator is to address any complaint where a member of the public has lodged a complaint and is not satisfied by John Holland’s / TfNSW’s response following completion of the process outlined within the CCS. Any member of the public that has lodged a complaint which is registered in the Complaints Management System, and that complaint is unresolved may ask the Community Complaints Mediator to review the Project’s response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public</p> <p>In accordance with NSW CoA B12, the Community Complaints Mediator will:</p> <ul style="list-style-type: none"> <li>▪ Review unresolved disputes if the procedures and mechanisms under the CCS do not satisfactorily address complaints</li> <li>▪ Make recommendations to John Holland / TfNSW to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes</li> <li>▪ Provide a copy of the recommendations, and Project’s response to the recommendations, to the Planning Secretary within a month of the recommendations being made.</li> </ul> <p>John Holland will implement the recommendations made by the Community Complaints Mediator in accordance with NSW CoA B12 within a timeframe agreed with the Community Complaints Mediator, unless otherwise agreed with the Planning Secretary.</p> <p>In accordance with NSW CoA B14, the Community Complaints Mediator will not act before the Complaints Management System required by NSW CoA B5 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in the Infrastructure Approval or clear government policy and resolution processes are available, or matters which are not within the scope of the CSSI.</p>

#### 5.1.4. Design Review Panel

To provide advice and recommendations during design development and construction of PLR2 – EW and to facilitate quality design and place outcomes, TfNSW will appoint an independent Design Review Panel (DRP). The DRP will be formed and hold its first meeting within six months of the date of the Infrastructure Approval, unless otherwise agreed by the Planning Secretary.

The responsibilities of the DRP are outlined in NSW CoA E62. The DRP will be operated and managed in accordance with the DRP Terms of Reference developed by TfNSW and endorsed by the NSW Government Architect. The DRP Terms of Reference will be submitted to the Planning Secretary upon request.





Advice from the DRP that is incorporated into the Project design must be generally consistent with the Project as approved. The DRP will be chaired by the NSW Government Architect (or their nominee), and be comprised of, where relevant, suitably qualified, experienced and independent professional(s) in the fields of:

- Urban design and place making (including active transport)
- Landscape architecture
- Architecture.

The DRP may seek advice from suitably qualified, experienced independent professionals in other fields as required. The DRP will also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice. DRP members will be sourced from the NSW State DRP Pool or otherwise be approved by the NSW Government Architect.

TfNSW will consult with the NSW Government Architect and appoint an appropriately qualified and experienced technical advisor to the DRP and may also appoint an alternate technical advisor. The technical advisor is a representative of TfNSW that can explain design decisions to the DRP based on constructability and operability of design elements. The advisor will attend DRP meetings. The advisor may also be invited by the DRP to assist with decisions regarding the DRP's recommendations and record the DRP's advice and recommendations.

A design development schedule will be provided to the DRP before its first meeting, including details of when relevant elements of the detailed design will be available for review by the DRP. The schedule will be updated every three months until the detailed design process is complete.

### 5.1.5. Regulator roles

The environmental responsibilities of regulators for PLR2 – EW are provided in Table 19.

*Table 19 – Key roles and responsibilities of regulators on PLR2 - EW*

Role	Responsibilities
<b>Planning Secretary (or delegate)</b>	<ul style="list-style-type: none"> <li>▪ Assessing compliance with the Infrastructure Approval</li> <li>▪ Assessing and approving any documents under the Infrastructure Approval which requires the specific approval of the Planning Secretary</li> <li>▪ Assessing any proposed modifications to the PLR2 – EW that are not consistent with the Infrastructure Approval</li> <li>▪ Responding to requests made by TfNSW and/or John Holland in accordance with the requirements of the Infrastructure Approval</li> <li>▪ Liaising with TfNSW during regular meetings (approximately monthly).</li> </ul>
<b>EPA</b>	<ul style="list-style-type: none"> <li>▪ Providing comment on the environment and planning documents as specified in the Infrastructure Approval</li> <li>▪ Provision of review and comment, where applicable, to incident reports for potential or actual environmental harm.</li> </ul>
<b>AG DCCEW</b>	<ul style="list-style-type: none"> <li>▪ Assessing compliance with EPBC CoA</li> <li>▪ Liaison with TfNSW with regard to Protected Matters.</li> </ul>
<b>Heritage NSW</b>	<ul style="list-style-type: none"> <li>▪ Advising on matters associated with the <i>Heritage Act 1977</i>.</li> </ul>
<b>NSW DCCEW BCS</b>	<ul style="list-style-type: none"> <li>▪ Advising on matters associated with threatened species and communities.</li> </ul>
<b>NSW DCCEW Water Group</b>	<ul style="list-style-type: none"> <li>▪ Advising on matters associated with water policy in NSW.</li> </ul>







Role	Responsibilities
DPIRD Fisheries	<ul style="list-style-type: none"> <li>Advising on matters associated with key fish habitats.</li> </ul>

## 5.2. Sub-contractor management

The Project Director and Environment and Sustainability Manager are responsible for the environmental performance of all sub-contractors. Subcontractors will be provided with detailed contracts and information packages before works commence that define environmental and sustainability obligations. Contracts will also clarify duties that the John Holland team will retain for environmental protection of the subcontracted work. Compliance obligations will be reinforced through training programs (e.g. inductions) and role specific training (Section 5.3).

The Environment and Sustainability Manager (or delegate) will participate in the tender assessment and selection process where it is deemed necessary due to associated environmental risks. All sub-contractors are required to complete a sub-contractor questionnaire or similar. As part of the sub-contractor selection process, consideration will be given to past environmental performance.

When engaging sub-contractors, John Holland will:

- Reflect relevant environmental management requirements (such as from the NSW and Federals approvals), sustainability requirements and other obligations in the planning, selection and management of sub-contractors
- Ensure sub-contractors are advised in writing of the environmental and sustainability requirements prior to commencing any work
- Ensure sub-contractors are made aware of their environmental and sustainability reporting requirements and conditions consistent with the relevant environmental management requirements
- Undertake a review of sub-contractors' documentation to verify compliance with this CEMP and the Construction Sustainability Management Plan
- Where required, sub-contractors will be required to support the development of EWMS, ECMs, CNVIS, and/or other approval documents prior to works
- Undertake appropriate monitoring of each sub-contractor's environmental protection measures together with the relevant documentation to ensure that the specified environmental protection requirements are effectively implemented and maintained.

All sub-contractors are required to work in accordance with the approved CEMP and Sub-plans. These obligations are to be monitored by the Environment and Sustainability Manager and wider John Holland team through inspections, monitoring, audits and reporting requirements (Section 7).

All sub-contractors are required to attend the PLR2 – EW Project induction where the requirements and obligations of the CEMP and Sub-plans will be communicated. A record of all sub-contractors inducted will be maintained as part of the induction and training register managed by the safety team.

As relevant to sub-contractor performance, John Holland will regularly review and keep a record of:

- General work practices
- Effectiveness of planned and implemented environmental protection measures
- Compliance with the requirements of this CEMP
- Maintenance of environmental measures.

All environmental documentation submitted by sub-contractors will be subject to review and approval by John Holland personnel to ensure compliance with the NSW and Federal approvals, Environmental Assessment Documentation, EPL (where obtained), this CEMP and TfNSW contract requirements, before works may begin.





### 5.3. Competence, training and awareness

To ensure that this CEMP and Sub-plans are effectively implemented, each level of management is responsible for ensuring that all construction personnel reporting to them are aware of the requirements of this CEMP and Sub-plans. The Environment and Sustainability Manager will coordinate the environmental and sustainability training in conjunction with other training and development activities (e.g. safety).

All John Holland staff and subcontractor personnel (including plant operators and truck drivers) working on the site will be provided with environmental training to achieve a level of competence and awareness appropriate to their assigned activities before they commence their assigned activities. No one is permitted to work on the PLR2 – EW who has not attended the appropriate environmental training to work on the site.

#### 5.3.1. Competence, training and awareness

All personnel (including sub-contractors) are required to attend a compulsory site induction that includes an environmental and sustainability component before commencement on-site. This is undertaken to ensure all personnel involved in the PLR2 – EW are aware of the requirements of this CEMP, the Environment and Sustainability Policy, PLR Stage 2 environment and sustainability commitments, environmentally sensitive areas and ECMs.

The environmental and sustainability requirements of the induction will include training of relevant persons in the efficient use of plant and materials to minimise all potential environmental impacts including noise, air pollution, water pollution, waste, contamination and hours of work and any other medium to high environmental risks identified by the risk assessment in the CEMP.

Short-term visitors to site undertaking inspections/entering the site (such as regulators) will be required to undertake a visitor induction and be accompanied by inducted personnel at all times. Temporary visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The Environment and Sustainability Manager (or delegate) will conduct the environment and sustainability component of the site inductions. The environment and sustainability component of the induction will cover relevant elements of the CEMP and the Construction Sustainability Management Plan, such as:

- This CEMP, including all Sub-plans, procedures and strategies, their purpose and objectives
- Environmental, social and compliance obligations
- Requirements of due diligence and duty of care
- Compliance obligations including relevant legislation, NSW and Federal approvals, and other licences, permits and approvals
- Potential environmental emergencies on-site and the emergency response procedures
- Reporting and notification requirements for pollution and other environmental incidents
- Responsibilities under the POEO Act, other relevant legislation and the EPL (where obtained)
- Key environmental issues and relevant mitigation and management measures
- Complaints response and reporting
- High risk activities and associated environmental safeguards and EWMS
- Site specific environmental management requirements and responsibilities
- A briefing on the use of spill kits
- Approval and responsibilities of ECMs, and the information contained within ECMs
- Erosion and sediment controls, water quality controls, and dewatering





- Minimising light pollution on sensitive receivers, including adjacent vegetation from ancillary facilities and during night works
- Management of contaminated material (including asbestos impacted material)
- Location of identified potential contaminated land sites
- Signs of contaminated soil, including visual asbestos identification protocols
- Procedure for unexpected finds of contaminated land; heritage; or threatened flora and fauna
- Location of acid sulfate soils or potential acid sulfate soils
- Responsibilities under the *Contaminated Land Management Act 1997*
- Responsibilities under the *National Parks and Wildlife Act 1974*, including the need to cease work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations
- Responsibilities under the *Heritage Act 1977* if an object of potential non-Aboriginal heritage is uncovered during construction
- Location of identified Aboriginal and non-Aboriginal archaeological heritage sites, areas of cultural sensitivity and areas of archaeological potential and the kinds of historical relics, structures or deposits which may be encountered during the works
- Noise, vibration and air quality management controls
- Approved standard hours and the process for seeking approval for out of hours works
- Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction
- Location of refuse bins, washing, refuelling and maintenance of vehicles, plant and equipment
- Waste minimisation principles, waste reporting and waste/recycle storage requirements
- Best practice energy efficiency
- Equipment start-up and shut down procedures
- Sustainability management measures and initiatives
- Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue and obligations under the EPBC Act and *Biodiversity Conservation Act 2016*
- Weed control measures, including obligations under the *Biosecurity Act 2015* to prevent the spread
- Specific responsibilities for the protection of flora and fauna
- Overview of PLR2 – EW ISC requirements.

A record of all site inductions will be maintained in an induction and training register managed by the safety team and retained on-site. The training register will identify who is trained, when trained, the trainer and what they were trained in. The Environment and Sustainability Manager may authorise amendments to the site induction where required to address Project modifications, legislative changes or amendments to this CEMP, Sub-plans or the Construction Sustainability Management Plan.

Refresher environmental awareness training will be provided as required, based on the environmental risk assessment and turnover of construction personnel.

### 5.3.2. Toolbox talks, training and awareness programs

Toolbox talks will be used to raise general awareness and educate construction personnel on construction-related environmental issues. Toolbox talks are used to ensure environmental awareness continues throughout construction. Toolbox talks will be tailored to specific environmental issues relevant to upcoming work, including (but not limited to):

- Incident notification requirements





- Erosion and sedimentation control
- Management of waste concrete
- Dewatering
- Hours of work
- Noise and vibration
- Housekeeping and waste management
- Contamination, Acid Sulfate Soils and asbestos containing materials
- Emergency and spill response
- Aboriginal and non-Aboriginal heritage
- Threatened species and ecological communities
- Clearing controls and vegetation protection
- Weed management
- Dust control
- Minimising light pollution during night works
- ECMs for specific activities / locations
- EWMS, for relevant construction personnel
- Traffic, transport and access requirements
- Lessons learnt from other projects, where relevant
- Incident and environmental alerts, where relevant.

Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and the records maintained. Toolbox talks which identify environmental issues and controls are to be held when works commence in a new area of the site, or a new activity, or when environmental issues arise on site, primarily in the form of an ECM.

Toolbox talks are to include, but not be limited to:

- A description of the proposed activity and the environmental constraints of the specific location
- Identification of the relevant environmental issues and risks for the proposed task / location
- An outline of the mitigation and management measures for the proposed works.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. Topics covered may include those detailed above, or others deemed necessary in the lead up to or during construction. Workers responsible for carrying out activities managed under an EWMS must undertake a toolbox talk on the requirements of the EWMS.

Awareness notes, in the form of posters, booklets, or similar will be developed and distributed to the Construction Manager, Project Engineers, Foremen / Site Supervisors and other personnel with a responsibility for managing specific work locations or activities. This documentation will be distributed to the broader construction workforce through daily pre-starts meetings and made available in site offices/break facilities.

For some activities required to be carried out under the Sub-plans, an appropriate level of training is necessary to ensure that the activity is suitably implemented. This includes, but not limited to:

- Noise and vibration monitoring
- Air quality monitoring
- Water quality monitoring





- Design and construction of stormwater quality controls
- Fauna rescue
- Pre-clearing surveys
- Pre and post-condition surveys
- Heritage works.

The Environment and Sustainability Manager will review and approve training programs and monitor implementation.

### 5.3.3. Daily pre-starts

Daily pre-start meetings are used to inform the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the work, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

The Foreman / Site Supervisor will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift.

The environmental component of pre-start meetings will include any environmental issues that could potentially be impacted by, or impact on, the day's activities, and will be developed by the Environment and Sustainability Manager (or delegate). All attendees will be required to sign on to the pre-start meeting and acknowledge their understanding of the issues explained.

Pre-start meeting topics, dates delivered, and a register of attendees will be recorded and maintained by the safety team and the records maintained.

## 5.4. Working hours

### 5.4.1. Hours of work

In accordance with NSW CoA E31, the approved standard hours are:

- 7:00 am to 6:00 pm Monday to Friday
- 8:00 am to 6:00 pm Saturday
- At no time on Sunday or public holidays.

### 5.4.2. Highly noise intensive works

As required by NSW CoA E32, highly noise intensive works (HNIW) that result in an exceedance of the applicable NML at the same receiver must only be undertaken:

- Between 8:00 am to 6:00 pm Monday to Friday
- Between 8:00am to 1:00pm Saturday
- At no time on Sunday or public holidays.

Highly noise intensive works will be carried out in continuous blocks not exceeding three hours each, with a minimum respite of at least one hour between ceasing and recommencing each block of work. 'Continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing the work.

The Infrastructure Approval defines highly noise intensive works as those identified as 'particularly annoying' including but not limited to those activities listed under the ICNG and includes:

- Use of power saws, such as used for cutting timber, rail lines, masonry, road pavement or steel work
- Grinding metal, concrete or masonry
- Rock drilling





- Line drilling
- Vibratory rolling
- Bitumen milling or profiling
- Jackhammering, rock hammering or rock breaking
- Impact piling.

Highly noise intensive works also includes any other activity identified by the AA, following an assessment of the character of the noise emitted by the activity based on the *Noise Policy for Industry*, Fact Sheet C considerations (EPA 2017).

The PLR2 – EW will require various highly noise intensive work activities including those listed above. The proposed equipment including any highly noise intensive equipment will be identified within the activity-specific CNVIS and given a 5 dB penalty in the noise modelling.

### 5.4.3. Variation to hours of work

Notwithstanding the approved standard hours in Section 5.4.1 and Section 5.4.2, works associated with the PLR2 – EW may be undertaken outside of these approved standard hours if one or more of the following circumstances apply as permitted by NSW CoA E33.

#### 5.4.3.1. Safety and emergencies

In accordance with NSW CoA E33(a), work that is required to manage safety and/or in the event of an emergency can be carried out outside of the approved standard hours, including:

- For the delivery of materials required by the NSW Police Force or other authority for safety reasons, or
- 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, otherwise known as 'emergency work'.

On becoming aware of the need for emergency work, the Environment and Sustainability Manager will notify the TfNSW Senior Environment and Sustainability Manager, the ER, AA, and the EPA (where an EPL is applicable) of the need for those works. TfNSW will notify the Planning Secretary using information provided by the Environment and Sustainability Manager.

The construction team, supported by the communications team, will use its best endeavours to notify affected residents and owners/occupiers of properties identified as sensitive land use of the likely impact and duration of those works.

#### 5.4.3.2. Low impact out of hours works

In accordance with NSW CoA E33(b), work that meets all of the following criteria can be carried out outside of the approved standard hours:

- Work that causes  $L_{Aeq(15 \text{ minute})}$  noise levels:
  - No more than 5 dB(A) above the RBL at any residence in accordance with the ICNG, and
  - No more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land use(s); or
- Work that causes  $L_{Amax}$  noise levels during the night time period of no more than 15 dB(A) above the RBL at any residence; or
- Work that causes:
  - Continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of *Assessing Vibration: a technical guideline* (DEC, 2006), or





- Intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of *Assessing Vibration: a technical guideline* (DEC, 2006).

#### 5.4.3.3. Approved OOHW

In accordance with NSW CoA E33(c), work can be carried out outside of the approved standard hours by approval, including:

- Where different work hours, including highly intensive work are permitted or required under an EPL in force in respect of the CSSI; or
- Work which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E34; or
- Through negotiated agreements with the substantial majority of affected residents and sensitive land use(s) for work which are not subject to an EPL. Upon request, a copy of the documented outcomes of the community consultation will be provided to the ER, AA, EPA and Planning Secretary

Refer to Section 6.3.7 of the NVMP for more guidance regarding negotiated agreements.

#### 5.4.3.4. Specified activities

In accordance with NSW CoA E33(d), a number of specified activities can be carried out outside of the approved standard hours, including:

- Work at the stabling and maintenance facility at Camellia;
- Recycling of spoil and ballast at the Grand Avenue construction compound, Camellia;
- Work in the road reserve of Silverwater Road and the use of cranes adjacent to Silverwater Road for the construction of the bridge over Silverwater Road; and
- Testing and commissioning of Light Rail Vehicles/infrastructure, driver training and trial running of Light Rail Vehicles.

Although the activities identified in NSW CoA E33(d) permit works to occur outside the approved standard hours, these activities still need to be managed in accordance with this CEMP, the NVMP, applicable CNVIS, and any other relevant conditions and licence requirements.

#### 5.4.4. Timetabling of work activities

Work activities for the PLR2 – EW will be timetabled to be carried out during the approved standard hours where possible. This applies in particular to excavation, demolition or rock breaking activities and for activities concentrated in a single area (i.e. activities that do not move along across the Project site, and/or do not require OOHW for safety reasons, duration respite or to minimise disruption to road networks).

Where work outside of the approved standard hours is planned to take place, the following hierarchy of preferred working hours (sourced from the CNVS) must be considered when timetabling works unless otherwise agreed with affected community through consultation:

- Saturday afternoon periods between 1.00 pm and 6.00 pm (Period 1 Day) (applicable to HNIW)
- Sunday and public holiday day periods between 8.00 am and 6.00 pm (Period 1 Day)
- Weekday evening periods between 6.00 pm and 10.00 pm (Period 1 Evening)
- Weekend evening periods between 6.00 pm and 10.00 pm (Saturdays Period 1 Evening/Sundays Period 2)
- Weekend night periods between 10.00 pm and 8.00 am (Period 2)
- Work during the weekday evening and night and scheduling the noisiest or vibration intensive work first (between 6.00 pm and 10.00 pm) to minimise sleep disturbance impacts in the night period between 10.00 pm and 7.00 am) (Period 1 Evening and Period 2)





- All other times outside recommended standard hours.

Highly noise and vibration intensive works as defined in the CNVS will be limited to the approved standard hours as far as practicable.

The hierarchy listed above shall be subject to feedback from affected sensitive receivers and key stakeholders (including the EPA) and can be revised on a case-by-case basis as required. This hierarchy does not apply to emergency work.

Timetabling of work activities will also take into account the appropriate respite periods and duration reduction preferences determined in consultation with the community / noise sensitive receivers at each affected location on a regular basis (see Section 6.2 of the NVMP for more details).

The Environment and Sustainability Manager (or delegate) and Stakeholder and Communications Manager (or delegate) will attend Project scheduling meetings as required to assist the construction teams with the management of work scheduling to minimise works outside of the approved standard hours. Further detail on specific timetabling and justification for undertaking works outside of the approved standard hours will be included in CNVIS for proposed work activities.

#### 5.4.5. Out of Hours Work (OOHW) Protocol

An Out of Hours Work (OOHW) Protocol has been prepared in accordance with NSW CoA E34, the CNVS, Environmental Assessment Documentation and the NVMP. The OOHW Protocol provides the process for the consideration, management and approval of work outside of the approved standard hours detailed in Section 5.4.1 and 5.4.2, for works that are not subject to an EPL.

The aim of the OOHW Protocol is to ensure that a rigorous process is followed to identify the risk of adverse impacts on sensitive receivers with regards to the OOHW, including, but not be limited to:

- Identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:
  - the ER and AA reviews all proposed out-of-hours activities and confirm their risk levels
  - low risk activities can be approved by the ER, in consultation with the AA
  - high risk activities that are approved by the Planning Secretary.
- The details to be provided in any OOHW application, including information on the nature and need and justification for activities to be conducted during the varied construction hours
- Requirements if the works are proposed through a negotiated agreement made with the impacted residents and sensitive land use(s)
- The process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods. Measures are to take into account the predicted noise levels and the likely frequency and duration of the OOHW that sensitive land use(s) would be exposed to, including the number of noise awakening events
- Procedures to facilitate the coordination of OOHW, including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided
- Requirements for consultation with potentially affected receivers and local Councils and notification to the Planning Secretary of approved low risk out-of-hours works.

The OOHW Protocol will be prepared in consultation with the ER and AA, and approved by the Planning Secretary before commencement of work out of standard hours.

Any application for OOHW is to demonstrate that the proposed OOHW is compliant with all licences, permits, approvals, consents, notification, statutory requirements, etc, and have been appropriately justified and assessed. If a certain activity or work is regulated by the EPA via an EPL, the management of the activity or work should not be co-regulated under the OOHW Protocol.

Consultation with the community will be managed by the Stakeholder and Communications Manager in consultation with the TfNSW communications team and will also be carried out prior to the OOHW being undertaken.





## 5.5. Communication

### 5.5.1. Internal communication

The environment team will meet regularly to discuss any issues with environmental management on-site, any amendments to plans that might be required or any new/changes to construction activities. Regular meetings will also occur with the ER, AA and TfNSW environment staff. These meetings will discuss ongoing environmental performance and identify any issues to be addressed.

In addition, environment team members will participate in regular toolbox talks to communicate on environmental performance, advise on any upcoming sensitive environmental matters for future work areas and to receive feedback from construction personnel.

Further internal communications regarding environmental issues and aspects will be through awareness training and pre-start meetings as described in Section 5.3.

### 5.5.2. Liaison with EPA, government authorities or other relevant stakeholders

John Holland will notify TfNSW of its proposed commencement of construction or stages of construction (if further staging proposed), who will notify the Planning Secretary in writing of the date of commencement of construction (or stage as relevant) of the PLR2 – EW at least one month before commencement of which the notification applies. TfNSW will also notify AG DCCEEW in writing of the date of commencement of the action within 10 business days after the date of commencement of the action to which the Federal approval applies.

The Environment and Sustainability Manager is the main point of contact regarding specific environmental issues. The Environment and Sustainability Manager is responsible for reporting on the ongoing environmental performance of the PLR2 – EW to TfNSW, the ER, AA and EPA (on receipt of an EPL). The Environment and Sustainability Manager will report regularly to TfNSW on progress and any key environmental matters, and to the EPA through monthly EPL reports (if relevant).

TfNSW will be immediately notified on each occasion that the site is visited by the EPA and/or other relevant agencies. Relevant government authorities will be consulted throughout construction as required by the NSW and Federal approvals, and other licences, permits and statutory requirements.

The Environment and Sustainability Manager will report to the EPA in the event of an occurrence or set of circumstances that causes or threatens to cause material harm.

### 5.5.3. Community liaison and/or notification

#### 5.5.3.1. TfNSW Community Communications Strategy

TfNSW has prepared a Community Communications Strategy (CCS) in accordance with the requirements of NSW CoA B1 to B4 to document the approach to stakeholder and community communications for PLR Stage 2, including PLR2 – EW. The CCS provides mechanisms to facilitate communication about construction of the CSSI with:

- The community (including adjoining affected landowners and businesses, and others directly impacted by the PLR2 – EW)
- Aboriginal people, RAPs and LALCs
- Relevant councils.

The CCS identifies opportunities for providing information and consulting with the community and stakeholders during the construction. The CCS is to be approved by the Planning Secretary, as required by NSW CoA B3.

The CCS includes:

- Details of people, organisations and councils to be consulted during the design and work phases of PLR2 – EW
- Details of the community and its demographics







- Timing of consultation
- Procedures and mechanisms for the regular distribution of accessible information, including to 'Language Other than English' (LOTE), culturally and linguistically diverse (CALD) and vulnerable communities about or relevant to the PLR2 – EW
- Opportunities for education within the community about construction sites
- Measures for advising the community in advance of upcoming work, including upcoming out-of-hours work, as required by NSW CoA E33, including:
  - Justification / description of the potential work, location and duration of the out-of-hours work
  - Noise characteristics and likely noise levels of the work, including qualitative descriptions
  - Likely mitigation and management measures which aim to achieve the relevant noise management levels and vibration criteria under NSW CoA E35 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).
- Details of the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for the PLR2 – EW
- Procedures and mechanisms to:
  - Allow the community to discuss or provide feedback to the PLR2 – EW
  - Allow representatives from PLR2 – EW to respond to community enquiries or feedback
  - Resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the PLR2 – EW, including disputes regarding rectification or compensation
- Details of who will engage with the community, relevant council(s) and agencies.

A range of communication tools are defined in the CCS, and may include:

- Targeted community open days
- Media releases and advertisements in local and metropolitan papers
- Public displays
- Door-knocks
- Letterbox drops
- Community update newsletters, information brochures and fact sheets
- Community information sessions and community forums
- Signage at construction sites
- Construction updates (including for councils, emergency services and bus operators)
- Project website
- Project 1800 number, email address and postal address.

The CCS was submitted for the Planning Secretary's approval no later than one month before the commencement of work on PLR2 – EW. The CCS will be implemented for the duration of the PLR2 – EW through the implementation of the John Holland Communications and Engagement Plan (CEP).

#### 5.5.3.2. John Holland Communications and Engagement Plan

John Holland will support the implementation of the CCS and in meeting the community relations obligations of the Infrastructure Approval during the delivery of the PLR2 – EW through the implementation of the CEP.







The CEP, which has been developed under and consistent with the CCS, details the procedures and processes for community notification, consultation and complaints management for the PLR2 – EW. It provides a targeted approach to achieving the objectives of the CCS and aligns with the ESMS.

The CEP:

- Guides John Holland's interactions with stakeholders and the community
- Responds to requirements for community and stakeholder liaison throughout the delivery of the PLR2 – EW
- Ensures John Holland will partner with TfNSW, and other PLR Stage 2 contractors as relevant, to coordinate stakeholder engagement and community consultation activities
- Supports the PLR2 – EW certainty of delivery by ensuring consistent standards of stakeholder and community liaison.

The objectives of the CEP are to:

- Establish and build genuine relationships with stakeholders and the community to increase support and understanding of the PLR2 – EW and to encourage sustainable and accessible community ownership and participation
- Minimise where possible, impacts on stakeholders and the community
- Actively manage impacts and disruption to stakeholders and the community
- Appropriately address stakeholder issues
- Ensure a “no surprises” approach exists where commitments to the community are met or exceeded at all times
- Ensure stakeholders and the community fully understand the activities to be undertaken by PLR2 – EW, potential impacts and expected outcomes
- Communicate early and often.

As part of the CEP, a Social Impact Management Plan (SIMP) will be prepared, in accordance with Section 5.2 of the *Social Impact Assessment Guideline for State Significant Projects* (DPIE, 2021), to manage the implementation of the proposed socio-economic mitigation measures, and detail the specific management actions and targets that will be developed in response to these measures. The SIMP will define specific actions, roles and responsibilities, and a monitoring, reporting and adaptive management framework for construction.

The CEP will be implemented for the duration of the PLR2 – EW.

### 5.5.3.3. Community and stakeholder liaison

The John Holland communications team, led by the Stakeholder and Communications Manager, will be available in the lead up to, and during, construction to listen to concerns and answer questions from the community and businesses. A nominated representative will provide a single point of contact for people (including business owners/operators) wanting to find out more about PLR2 - EW, including the impacts of construction, and the measures that will be implemented to minimise these impacts as far as possible.

Consultation with relevant key stakeholders (including facility managers) in relation to community infrastructure with the potential to be directly affected (by the Project's land requirements) and/or indirectly affected (for example, as a result of amenity impacts or access changes) will continue throughout construction of the PLR2 – EW. Consultation will be undertaken in accordance with the CCS and CEP, and will assist with identifying measures to minimise the potential impacts of the PLR2 – EW on community infrastructure as far as possible. Stakeholders to be consulted include, but are not limited to, relevant councils, NSW Maritime, Melrose Park Public School and the Department of Education, and SOPA.

TfNSW and John Holland will continue to consult with relevant councils and SOPA to offset the direct impacts of the Project's land requirements on open space (parks and reserves) through the provision





of a net increase in open space, including active transport infrastructure and improved open spaces and recreation facilities.

#### 5.5.4. Complaints management

All community enquiries and complaints related to the construction activities will be referred to:

- 24-hour toll free community information line: 1800 139 389
- Project postal address: Level 7, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
- Email address: [parramattalightrail@transport.nsw.gov.au](mailto:parramattalightrail@transport.nsw.gov.au)

Details of the above contact details for enquiries and complaints related to the PLR2 – EW will be on the TfNSW project website, before the commencement of work.

The CEP includes the requirement to maintain a Complaints Register which will record the details of all complaints relating to the PLR2 – EW including the following:

- Date and time of the complaint
- Method by which the complaint was made (telephone, letter, meeting, etc)
- Any personal details of the stakeholder (name, address, contact telephone number)
- Nature of the complaint
- Action taken in relation to the complaint, means by which the complaint was addressed and any follow up
- Any monitoring to confirm that the complaint has been satisfactorily resolved
- Whether resolution was reached, with or without mediation
- If no action taken, reasons why
- The status of resolution of the complaint.

Once complaints have been received and allocated to the PLR2 – EW by TfNSW, attempts will be made to resolve complaints in accordance with the CEP. All complaints will be investigated and the source of the complaint determined immediately, with a phone call made to the complainant (when received by phone) by the Stakeholder and Communications Manager (or delegate). An initial response will be provided during this phone call, unless the complainant agrees otherwise.

An initial written response to email complaints will be provided within 24 hours (or during the next business day if received out-of-hours) and a resolution provided within seven business days, if the complaint cannot be resolved in the initial contact.

The complainant will be kept informed and updated of the progress until the complaint is resolved.

For any complaints or enquiries which are received (e.g. via the complaints line or email) and allocated to the PLR2 – EW for resolution, details will be uploaded to TfNSW's cloud-based database – Consultation Manager. Enquiries will be recorded in Consultation Manager but are not classified as complaints. A maximum of seven business days should be taken to respond to an enquiry.

Complainants will be advised of the following information before, or as soon as practicable after, providing personal information in accordance with NSW CoA B8:

- The Complaints Register may be forwarded to government agencies, including the Planning Secretary and its representatives (including independent appointments such as the ER, or AA), to allow them to undertake their regulatory duties
- By providing personal information, the complainant authorises the Proponent to provide that information to government agencies
- The supply of personal information by the complainant is voluntary
- The complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement).





A Collection Statement will also be included on the TfNSW Project website to make prospective complainants aware of their rights under the *Privacy and Personal Information Protection Act 1998* (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.

The Stakeholder and Communications Manager (or delegate) will be responsible for providing information to TfNSW to assist with the updates of the Complaints Register. The Complaints Register will be provided to the Planning Secretary on request in accordance with NSW CoA B9. In accordance with NSW CoA A31 and A34, the Complaints Register will be provided to the ER and AA on a weekly basis where complaints have been received, or as requested.

The Stakeholder and Communications Manager (or delegate) will inform TfNSW once a complaint has been resolved and if not resolved escalate to the TfNSW Community and Stakeholder Engagement Manager for further resolution. An escalation process will be followed for the resolution of complaints which requires escalation to the TfNSW Communication and Stakeholder Engagement Manager and TfNSW Project Manager. TfNSW will establish a mediation system for complaints unable to be resolved. The mediation system will be available for the duration of PLR2 – EW. Further details of the mediation system are provided in the CCS.

The Environment and Sustainability Manager is to apply an adaptive approach to ensure that corrective actions are applied in consultation with construction personnel to allow modifications and improvements in the management of environmental issues resulting in community complaints.

In respect of each complaint made, the Stakeholder and Communications Manager must advise each complainant of the results of the investigation of their complaint and any proposed remedial action within a reasonable period of time. Where required, noise monitoring is to be carried out in accordance with the NVMP.

In accordance with NSW CoA B5, the complaints management system will be maintained for the duration of PLR2 – EW and for a minimum for 12 months following completion of the project.

#### 5.5.5. Project website

A website has been established for PLR Stage 2 (<https://www.nsw.gov.au/driving-boating-and-transport/projects/parramatta-light-rail/stage-2>) and will be regularly maintained during construction of the PLR2 – EW and wider PLR Stage 2 works. The TfNSW Project website will be kept up to date with the latest construction information, environmental assessments, and will include all community updates. The TfNSW Project website includes methods for the community to provide feedback, enquiries and complaints related to the PLR2 – EW, including the CSSI name; application number; telephone number, postal address and email address required under NSW CoA B6.

In accordance with NSW CoA B15, the following information will be maintained by TfNSW on the Project website:

- Information on the current implementation status of the PLR2 – EW
- The Environmental Assessment Documentation and any documentation relating to any modifications made to the PLR2 – EW planning approvals
- A copy of the Infrastructure Approval in its original form, a current consolidated copy of the Infrastructure by the Minister to a modification of the terms of the Infrastructure Approval
- A copy of each statutory approval, licence or permit required and obtained for PLR2 – EW
- A current copy of each document required under the terms of the Infrastructure Approval
- A copy of any audit reports required under the Infrastructure Approval.

John Holland will provide information to TfNSW as required to assist in the management of the Project website, including:

- A copy of this CEMP and Sub-plans
- Documentation required to be published under the Infrastructure Approval





- Community notifications, including for OOHW
- Modifications to the Infrastructure Approval
- Other documents requested by TfNSW.

John Holland will supply documents to TfNSW required by the relevant NSW and Federal approvals to be made publicly available, meeting TfNSW and Minister's requirements including web-accessibility. Where the information/document relates to a particular work activity or is required to be implemented, it must be published before the commencement of the relevant work activity to which it relates or before its implementation.

Relevant Project information will be published on the website for the duration of construction. As required by EPBC CoA 10, Sub-Plans (the overarching plans approved by the Secretary) will be published on the Project website within 15 business days of the date of their approval, unless otherwise agreed to in writing by the Federal Minister for the Environment and Water.

Confidential information, which may include the location of threatened species, Aboriginal objects or places and personnel contact details, will be removed from all documents provided before being made available to the public.

### 5.5.6. Aboriginal Focus Group

During construction, John Holland will attend regular meetings with the Aboriginal Focus Group (AFG) established and held by TfNSW. AFG meetings will be held to:

- Provide updates on the progress of the works and forthcoming activities, including sharing information on Project activities pertinent to Aboriginal culture, Caring for Country and Aboriginal participation
- Provide updates on progress of the commitments made in the Aboriginal Cultural Heritage Assessment Report prepared for the EIS (TfNSW, 2023)
- Provide an appropriate mechanism for AFG feedback on Project activities including design, delivery and procurement
- Promote participation in Designing with Country processes and outcomes
- Encourage sharing of knowledge in consideration of cultural sensitivities.

AFG meetings will be scheduled in conjunction with key PLR2 – EW activities or milestones, but at least every six months. Where the meeting interval is longer than six months John Holland would be responsible for re-establishing the AFG compliant with the terms of the *TfNSW procedure for Aboriginal cultural heritage consultation and investigation*.



## 6. Emergencies and incidents

The Environmental Incident Procedure (Appendix A5) (TfNSW, EMF-EM-PR-0001) outlines the procedure to be followed if, during an activity being carried out there is:

- A report-only event
- A non-compliance
- Regulatory action received
- An environmental incident.

The Environmental Incident Procedure sets out the steps for the:

- Identification
- Classification
- Reporting of report-only events, non-compliances, regulatory action and environmental incidents.

Emergency contacts for PLR2 – EW are provided in the '*List of emergency and key contacts*'.

For any construction traffic incidents and the required response, see the CTTAMP for details. If an environmental incident occurs as a result of a construction traffic incident, this will be reported in accordance with the Environmental Incident Procedure (Appendix A5).

The key requirements of the Environmental Incident Procedure (Appendix A5) are summarised in the sections that follow.

### 6.1. Emergency preparedness

Environmental emergency planning and awareness training will be undertaken for construction and based upon the Environmental Incident Procedure (Appendix A5). All construction personnel will be inducted on the environmental incident management process detailed in Appendix A5, as well as implementing the relevant environmental safeguards and risk mitigation measures.

John Holland will ensure that the following equipment will be available to all construction personnel to utilise in the event of an incident:

- Protective gloves for certain types of corrosive chemicals
- Other personal protective equipment required for the handling of hazardous chemicals
- Spill kits
- Stormwater drain guards
- Alarms, including fire alarms
- Firefighting equipment
- Up-to-date safety data sheets for any chemicals or fuels used or stored at the premises
- Hard hats for designated 'emergency controllers'
- Eye-wash stations.

John Holland will ensure that all construction personnel are aware of where the equipment listed above is located on site and are appropriately trained on the use of all equipment.

### 6.2. Incident identification

Section 3 of the Environmental Incident Procedure (Appendix A5) details the actions to be undertaken for incident response.





### 6.3. Incident classification

Table 3.1.1 of the Environmental Incident Procedure (Appendix A5) details environmental incident classification based upon three risk areas:

- Environment
- Reputation and integrity
- Regulation and compliance.

Table 20 provides the definitions of each type of environmental incident/issue.

*Table 20 – Environmental event definitions for PLR2 – EW*

Event	Definition
<b>Environmental event</b>	<ul style="list-style-type: none"> <li>▪ A report-only event, non-compliance, regulatory action or environmental incident.</li> </ul>
<b>Environmental incident</b>	<ul style="list-style-type: none"> <li>▪ An environmental incident is an event or set of circumstances, as a consequence of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur</li> <li>▪ Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts</li> <li>▪ An unexpected find that is not managed in accordance with relevant procedures / guidelines is also considered an environmental incident.</li> </ul>
<b>Non-compliance (as per Infrastructure Approval)</b>	<ul style="list-style-type: none"> <li>▪ Non-compliance is an occurrence, set of circumstances or development that is a breach of the Infrastructure Approval</li> <li>▪ A non-compliance also includes failure to implement the CEMP and CEMP Sub Plans.</li> </ul>
<b>Notifiable event</b>	<ul style="list-style-type: none"> <li>▪ Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority, i.e. NSW CoA A44 for incidents or NSW CoA A46 for non-compliances.</li> </ul>
<b>Report-only event</b>	<ul style="list-style-type: none"> <li>▪ An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.</li> </ul>
<b>Significant incident</b>	<ul style="list-style-type: none"> <li>▪ An environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management.</li> </ul>
<b>Incident affecting protected matter(s)</b>	<ul style="list-style-type: none"> <li>▪ An event that has the potential to, or does impact, Matters of National Environmental Significance other than as authorised by the PLR Stage 2 Federal approval.</li> </ul>

### 6.4. Incident notification and reporting

Notification and reporting of environmental incidents will be in accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5), specifically Figure 3.2.1. A summary of notification requirements is provided in Table 21. If requested, TfNSW's nominated data system (i.e. Ngara) will be used in accordance with TfNSW requirements for reporting of incidents and close out.

All environmental incidents, non-compliances and report-only events will be immediately notified verbally to the TfNSW Senior Environment and Sustainability Manager (or delegate) during standard hours or via SMS outside of standard hours. Incident reports will be provided to TfNSW in accordance with the TfNSW Environmental Incident Procedure, including lessons learnt from each environmental incident and proposed measures to prevent the occurrence of a similar incident. All efforts will be





undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

Incidents that meet the criteria outlined in the NSW and Federal approvals will also be immediately notified verbally to the ER during standard hours or via SMS outside of standard hours. Incident reports will be provided to TfNSW and ER. TfNSW will provide written notification to the Planning Secretary and/or AG DCCEEW in accordance with the procedure outlined in Appendix A5. In accordance with NSW CoA A44, the Planning Secretary must be notified in writing via the Major Projects website as soon as possible and no later than 24 hours after TfNSW become aware of the incident.

NSW CoA A45 also requires additional written notification within seven days and a detailed report within 30 days of the incident occurring, if requested by the Planning Secretary. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after TfNSW becomes aware of a notifiable incident. Notification is required to be given even if John Holland / TfNSW fails to give the notification required under NSW CoA A45 or, having given such notification, subsequently forms the view that a notifiable incident has not occurred.

Written notifications of an incident to the Planning Secretary must:

- Identify the CSSI and application number
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as a notifiable incident)
- Identify how the incident was detected
- Identify when John Holland and TfNSW became aware of the incident
- Identify any actual or potential non-compliance with terms of the Infrastructure Approval
- Describe what immediate steps were taken in relation to the incident
- Identify further action that will be taken in relation to the incident
- Identify a PLR2 – EW contact for further communication regarding the incident.

If requested by the Planning Secretary, within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, TfNSW (using information provided by John Holland) must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

The incident report must include:

- A summary of the incident
- Outcomes of an incident investigation, including identification of the cause of the incident
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- Details of any communication with other stakeholders regarding the incident.

In accordance with EPBC CoA 23 and 24, AG DCCEEW must also be notified in writing of any incident affecting protecting matters. The notification must be submitted as soon as practicable and no later than 2 business days after becoming aware of the incident affecting protected matters.

In accordance with EPBC CoA 24, AG DCCEEW must be provided with the details of the incident no later than 12 business days after becoming aware of the incident affecting protected matters.





Table 21 – Summary of requirements for incident notification and reporting

Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
<b>Regulatory action (material harm under the POEO Act)</b>	<ul style="list-style-type: none"> <li>EPA environment line</li> <li>Fire and Rescue NSW (for events that present an immediate threat to human health or property)</li> <li>Ministry of Health</li> <li>SafeWork NSW</li> <li>Relevant Council's</li> <li>TfNSW Senior Manager Environment and Sustainability</li> <li>ER</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager
	<ul style="list-style-type: none"> <li>Planning Secretary</li> </ul>	As soon as possible, and no later than 24 hours after TfNSW becomes aware of an incident.	TfNSW (via the major projects portal)	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Written notification report</li> <li>Detailed incident report, if requested by the Planning Secretary</li> </ul>	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Within 7 days</li> <li>Within 30 days</li> </ul>	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager
<b>Regulatory action (other than material harm under the POEO Act):</b> <ul style="list-style-type: none"> <li>Discovery of Aboriginal objects</li> </ul>	<ul style="list-style-type: none"> <li>TfNSW Senior Manager Environment and Sustainability</li> <li>RAPs</li> <li>Heritage NSW</li> </ul>	As soon as possible, and no later than 24 hours after TfNSW becomes aware of an incident.	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager





Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
– Discovery of all human remains	<ul style="list-style-type: none"> <li>NSW Police</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager
If TfNSW activities have contaminated land or if TfNSW owns land that has been contaminated	<ul style="list-style-type: none"> <li>EPA</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	Environment and Sustainability Manager
The location of a relic once a relic has been discovered or located	<ul style="list-style-type: none"> <li>TfNSW Senior Environment and Sustainability Manager</li> <li>Heritage NSW</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager
TfNSW Incident Classification C1, C2, C3 (excluding material harm)	<ul style="list-style-type: none"> <li>TfNSW Senior Environment and Sustainability Manager</li> <li>ER</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager
Significant Incident (C1, C2, C3) with potential for: <ul style="list-style-type: none"> <li>Regulatory action (e.g. EPA Penalty Infringement Notice) and/ or</li> <li>Reputational damage (e.g. media coverage) and/ or</li> <li>Significant environmental harm.</li> </ul>	<ul style="list-style-type: none"> <li>TfNSW Executive Director Environment and Sustainability who will determine whether further escalation to the Planning Secretary and other senior management is required</li> <li>ER</li> </ul>	Immediately	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager





Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
<b>TfNSW Incident Classification C4, C5, and C6</b>	<ul style="list-style-type: none"> <li>TfNSW Senior Environment and Sustainability Manager</li> <li>ER</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager
<b>Environmental incident with the potential for unapproved impacts on a drinking water supply</b>	<ul style="list-style-type: none"> <li>Local water supply authority</li> <li>EPA</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	Environment and Sustainability Manager
<b>Report-only events</b>	<ul style="list-style-type: none"> <li>TfNSW Senior Environment and Sustainability Manager</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	In accordance with Section 3.2 of the Environmental Incident Procedure in Appendix A5	Environment and Sustainability Manager
<b>Any incident (as defined in the NSW Infrastructure Approval)</b>	<ul style="list-style-type: none"> <li>Planning Secretary</li> <li>ER</li> </ul>	As soon as possible and no later than 24 hours after TfNSW becomes aware of an incident.	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Written notification report</li> <li>Detailed incident report, if requested by the Planning Secretary</li> </ul>	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Within 7 days</li> <li>Within 30 days</li> </ul>	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager
<b>Incident affecting protected matters</b>	<ul style="list-style-type: none"> <li>TfNSW Senior Environment and Sustainability Manager</li> <li>ER</li> </ul>	Immediately	Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager
	<ul style="list-style-type: none"> <li>AG DCCEEW</li> </ul>	As soon as practicable, and no later than 2 business days after becoming aware of the incident	TfNSW Senior Environment and Sustainability Manager	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	In accordance with Section 3.2 of the Environmental Incident Procedure (Appendix A5)	Environment and Sustainability Manager / TfNSW Senior Environment and Sustainability Manager







## 6.5. Incident investigation

Where required, due to the severity or ongoing nature of an incident, investigations will be conducted and action plans established to ensure that the incident does not occur again. Environmental investigations will include:

- Identification of the cause, extent and responsibility of the incident
- Identification and implementation of the necessary corrective action
- Identification of the personnel responsible for carrying out the corrective action
- Implementation or modification of controls necessary to avoid a repeat occurrence of the incident
- Recording of any changes in written procedures required
- Notifying all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the POEO Act.

Where there are lessons learnt from the investigation or current procedures are identified as being ineffective, the CEMP will be revised by the Environment and Sustainability Manager to include improved procedures or requirements.

## 6.6. Environmental incident simulation drills

Environmental incident simulation drills will be undertaken at least once every 12 months. Additional drills may be required at the discretion of the Environment and Sustainability Manager in response to notifiable pollution incidents.

Environmental incident simulation drills may be integrated into other emergency and incident testing and training programs and delivered as a desktop simulation or practical exercise. The Environment and Sustainability Manager will coordinate the drill and prepare a brief report on the outcomes and lessons learned.



## 7. Monitoring and Review

### 7.1. Environmental inspections

Environmental inspections will be undertaken for the duration of the PLR2 – EW. The type and frequency of environmental inspections will be determined by the environmental risk assessment and reflect the minimum requirements detailed in Table 22. Refer to the relevant Sub-plans for details on aspect-specific inspections.

Environmental inspections undertaken by John Holland environmental personnel will be documented in an online inspection form using Soteria (John Holland's compliance and incident tracking system). Copies of all environmental inspection reports prepared by John Holland environmental personnel, TfNSW, the ER and AA will be kept within project records and closed out within agreed timeframes.

All actions identified during environmental inspections will be tracked in an action tracking register and closed out within the required timeframes by the allocated construction personnel. The action tracking register will list the required action, date raised, status, and close out date. This register will be updated by the Environmental Advisor (or delegate) and monitored by the Environment and Sustainability Manager for on-time completion.

Table 22 – Environmental inspection

Type of inspection	Minimum Frequency	Form	Scope	By Whom
<b>Internal inspections</b>				
<b>Informal – work sites</b>	Pre-work / Daily	Daily diary	Site housekeeping; erosion and sediment controls; tree protection; dust mitigation; noise controls; other environmental controls; confirm resources required to perform works effectively are available and in place	Forman / Supervisor / Leading Hand
<b>Informal – work sites</b>	Daily	Environmental Checklist, as required	Significant environmental aspects and impacts including erosion and sediment controls	Environment and Sustainability Manager / Environmental Coordinator
<b>Formal – work sites</b>	Weekly	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	Environment and Sustainability Manager / Environmental Coordinator
<b>Sustainability inspections</b>	As required, to confirm adequate implementation of the Construction Sustainability Management Plan	Sustainability checklist	Environmental and social aspects	Sustainability Representative
<b>Soil conservationist inspections</b>	As required	ERSED Report	As detailed in the CSWMP	Soil conservationist
<b>Wet weather preparation inspections</b>	Prior to rainfall where a wet weather event is predicted	Wet weather	Ensure that all erosion and sediment control measures installed on the premises are inspected and works undertaken to repair and/or	Environment and Sustainability Manager / Environmental Coordinator



Type of inspection	Minimum Frequency	Form	Scope	By Whom
			maintain these controls if practicable and safe to do so.	
<b>Formal – work sites</b>	Post rainfall / significant weather event	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	Environment and Sustainability Manager / Environmental Coordinator
<b>Formal – work sites</b>	Pre-flood	Environmental Checklist	Ensure that all erosion and sediment control measures installed on the premises are inspected and works undertaken to repair and/or maintain these controls if practicable and safe to do so.	Environment and Sustainability Manager / Environmental Coordinator
<b>Formal – Shutdown inspections</b>	Before and after site shutdowns (e.g. site closed for more than four days, such as during Christmas) or a significant weather event is forecast (e.g. storm event requiring shutdown of the site)	Environmental aspects of the PLR2 - EW Shutdown Checklist	Significant environmental aspects and impacts including erosion and sediment controls	Environment and Sustainability Manager
<b>Formal – Start up inspections</b>	Following a shutdown period if a significant weather event has occurred during this time	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	Environment and Sustainability Manager / Environmental Coordinator
<b>External inspections</b>				
<b>TfNSW Inspections</b>	TfNSW to attend ER inspections and carry out other inspections based on an assessment of risk or to confirm action close out as appropriate	Determined by TfNSW	Determined by TfNSW	TfNSW
<b>ER Inspections</b>	Typically, on a weekly or fortnightly basis. Noting that frequency may vary based on an assessment of risk	Determined by ER	Determined by ER	ER
<b>AA inspections</b>	Typically, on a fortnightly or monthly basis. Noting that frequency may vary based on an assessment of risk	Determined by AA	Determined by AA	AA
<b>Planning Secretary inspections</b>	Determined by Planning Secretary	Determined by Planning Secretary	Determined by Planning Secretary. TfNSW to co-ordinate with Planning Secretary	Planning Secretary



Type of inspection	Minimum Frequency	Form	Scope	By Whom
<b>EPA and other agency inspections</b>	Determined by EPA	Determined by EPA.	Determined by EPA. John Holland to co-ordinate	EPA

### 7.1.1. ER, AA and TfNSW inspections

The ER, AA and TfNSW environment team will carry out regular inspections of work sites and critical activities throughout construction of the PLR2 – EW. Inspections by the ER and TfNSW will typically occur on a weekly or fortnightly basis depending on the complexity and anticipated risks associated with the stage of construction. Inspections will be carried out in accordance with the TfNSW inspection procedure. Inspections by the AA may include independent monitoring reviews and would typically be carried out on a fortnightly to monthly basis depending on the complexity and anticipated noise and vibration risks associated with the stage of construction.

The Environment and Sustainability Manager (or delegate) and construction personnel, such as Project Engineer / Construction Manager / Foreman / Supervisor will participate in all ER, AA and TfNSW inspections and will maintain appropriate records. Deficiencies and required actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed in accordance with the TfNSW inspection procedure. Timeframes for close out of issues will be discussed at the end of the inspection and nominated in the inspection report.

TfNSW may authorise environmental specialists as agents of TfNSW to enter the PLR2 – EW site for the purposes of surveillance or inspection and to attend site meetings to discuss environmental aspects of the PLR2 – EW.

### 7.1.2. Inspections by Planning Secretary, EPA and other agencies

The Environment and Sustainability Manager will advise TfNSW on each occasion that the site is visited by the Planning Secretary, the EPA and/or other relevant agencies. Where TfNSW are not in attendance, the Environment and Sustainability Manager will provide TfNSW with details of the purpose and outcome of the visit, and of all actions taken by John Holland in response to the visit.

## 7.2. Environmental Monitoring

Monitoring will be undertaken to validate the impacts predicted for the PLR2 – EW, to measure the effectiveness of environmental controls and implementation of this CEMP and Sub-plans and to address approval requirements. The monitoring requirements for required aspects are included in the relevant issue-specific environmental management plans and summarised in Table 23.

Table 23 – Environmental Monitoring Requirements

Requirement	Description	Relevant Plan	Reporting requirements
<b>NSW CoA C20(a)</b>	Noise and Vibration Monitoring Program	NVMP	Annual (within 30 days of the end of reporting period), recipients of the report will include: <ul style="list-style-type: none"> <li>▪ TfNSW</li> <li>▪ ER</li> <li>▪ AA</li> <li>▪ Planning Secretary</li> <li>▪ NSW EPA</li> <li>▪ City of Parramatta Council</li> <li>▪ SOPA</li> </ul>
<b>UMM W11</b>	Surface water quality Monitoring Program	SWMP	
<b>UMM AQ1</b>	Air Quality, Odour and Landfill Gas Monitoring Program	AQMP	



Requirement	Description	Relevant Plan	Reporting requirements
			<ul style="list-style-type: none"> <li>Project website</li> </ul>
<b>UMM BD15</b>	Biodiversity Monitoring Program	FFMP	As determined by TfNSW (refer to the Biodiversity Monitoring Program)

The Construction Monitoring Programs required by NSW CoA C20 will provide:

- Details of baseline data available
- Details of baseline data to be obtained and when
- Details of all monitoring of the PLR2 – EW to be undertaken
- The parameters of the PLR2 – EW to be monitored
- The frequency of monitoring to be undertaken
- The location of monitoring
- The reporting of monitoring results and analysis of results against relevant criteria will be undertaken (including trends in the data, including maximum, minimum and average data results for all monitored parameters)
- Details of the methods that will be used to analyse the monitoring data
- Procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable impacts
- Consideration of SMART principles
- Any consultation to be undertaken in relation to the monitoring programs.

Construction Monitoring Programs are to be prepared under and consistent with the CEMP and in consultation with the relevant stakeholders and agencies, as outlined in Section 1.8.1.

The Construction Monitoring Programs will be endorsed by the ER and submitted to the Secretary for approval at least one month before commencement of construction, except those permitted to be endorsed by others pursuant to a CEMF approved by the Planning Secretary. Construction will not commence until the Secretary has been provided the Construction Monitoring Programs, and all relevant baseline data for the specific construction activity has been collected.

Regular monitoring and measurement will be undertaken to monitor environmental management performance and evaluate compliance. The procedures set out in the Monitoring Programs must contain the scope, methodology and responsibilities for its implementation.

The Construction Monitoring Programs including any minor amendments approved by the ER, will be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.

The results of the monitoring will be reported within Construction Monitoring Reports at the frequencies and to the relevant parties as outlined in Table 23, from the commencement of construction. Construction Monitoring Reports must include the results of monitoring undertaken in accordance with the Construction Monitoring Programs including for noise and vibration, surface water quality and air quality. Construction Monitoring Reports will be provided by TfNSW to the Planning Secretary for information.

Should a non-compliance be detected or monitoring results directly attributable to the PLR2 – EW exceed the target set in the Monitoring Programs, the following will be implemented:

- Analysis of the results by the Environment and Sustainability Manager in more detail with a view of determining possible causes for the non-compliance
- Site inspection by the Environment and Sustainability Manager (or delegate)







- Advising relevant personnel of the problem
- Identifying and agreeing on actions to resolve or mitigate the non-compliance
- Implementing actions to rectify or mitigate the non-compliance.

A non-compliance report may be issued by the Environment and Sustainability Manager in response to the non-compliance if it is found to be construction related. The timing for any improvement will be agreed between the relevant Project Manager/Construction Manager and the Environment and Sustainability Manager based on the level of risk (e.g. a significant risk will require immediate action). The ER will be kept informed of any non-compliance including the status of implementation or improvement actions.

The ER and TfNSW will be advised of any non-compliances from monitoring and details reported in the Monthly Environmental Reports and also in the Construction Monitoring Reports.

All environmental monitoring equipment will be maintained and calibrated according to manufacturers' specifications and appropriate records kept.

## 7.3. Compliance management and monitoring

### 7.3.1. Non-compliance procedure

A non-compliance is an occurrence, set of circumstances or development that is a breach of the Infrastructure Approval. A non-compliance also includes failure to implement the CEMP and CEMP Sub Plans.

Non-compliances will be immediately notified to the Environment and Sustainability Manager. The Environment and Sustainability Manager will implement immediate response actions to prevent or minimise environmental impacts where necessary and safe to do so.

The Environment and Sustainability Manager will immediately advise the John Holland Project Director, the TfNSW Environmental Officer and the TfNSW Project Management Team of the non-compliance and whether notification to regulatory authorities has been made to regulatory authorities (refer to the Environmental Incident Procedure, Appendix A5).

The Environment and Sustainability Manager will submit an initial non-compliance report within 24 hours of the notification and a full non-compliance report including corrective actions (refer to Section 7.3.4) within 48 hours of the notification. As detailed in the Environmental Incident Procedure (Appendix A5), non-compliance reports will be submitted via INX.

In accordance with NSW CoA A46, the Planning Secretary must be notified in writing via the Major Projects website within seven days after TfNSW or John Holland becomes aware of any non-compliance. As required by NSW CoA A46, a non-compliance notification must identify:

- Project (i.e. PLR Stage 2)
- Stage (i.e. PLR2 – EW)
- Infrastructure Approval application number (i.e. SSI-10035)
- Set out the NSW CoA that is non-compliant
- Outline the way in which it does not comply
- Provide the reasons for the non-compliance (if known)
- Describe what actions have been, or will be, undertaken to address the non-compliance.

The ER will also be informed of any non-compliance.

As specified in NSW CoA A47, a non-compliance which has been notified as an incident does not need to also be notified to the Planning Secretary as a non-compliance.



### 7.3.2. Reporting a non-compliance under the Federal EPBC Act Approval

In accordance with EPBC CoA 23 and 24, AG DCCEE must also be notified in writing of any non-compliance with the conditions or non-compliance with the commitments made in the FFMP. The notification must be submitted as soon as practicable and no later than 2 business days after becoming aware of the non-compliance, with a follow up report providing further details regarding corrective action(s) within 12 business days.

### 7.3.3. Compliance records and reports

The Environment and Sustainability Manager is responsible for maintaining compliance records as current at the point of use. The Environment and Sustainability Manager (or delegate) will provide TfNSW with a copy of all compliance records to satisfy the requirements of the Federal approval. TfNSW are required to maintain accurate and complete compliance records.

If AG DCCEE makes a request in writing, TfNSW must provide electronic copies of compliance records to AG DCCEE within the timeframe specified in the request.

In accordance with EPBC CoA 19, a compliance report will be prepared by TfNSW in accordance with the 'Annual Compliance Report Guidelines, Commonwealth of Australia 2023' for each 12-month period following the commencement of construction. TfNSW will:

- Publish the report on the website within 20 business days following the relevant 12-month period
- Notify AG DCCEE by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication
- Keep all compliance reports publicly available on the website
- Exclude or redact sensitive ecological data from published compliance reports
- Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to AG DCCEE within 5 business days of publication.

### 7.3.4. Corrective and preventative actions

When a non-compliance is identified, the following will be completed to rectify the non-compliance:

- John Holland will liaise with the appropriate construction personnel or qualified person to identify the appropriate corrective/preventative actions and improvement opportunities
- Corrective/preventative actions and improvement opportunities will be entered into the John Holland quality management system database (Soteria) and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes
- John Holland will provide the corrective/preventative actions and improvement opportunities information to TfNSW in the monthly environmental reports
  - If a corrective action is required, a process will be completed for verification of how the non-compliance has been closed out and to confirm that it is effective in addressing the non-compliance
  - If a preventive action is required, relevant incidents, complaints, audit findings and non-compliances will be discussed between the Environment and Sustainability Manager, TfNSW and the ER
- The John Holland quality management system database will be reviewed regularly to ensure actions are closed out as required.

Any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, review of compliance, audit findings or other reviews.





### 7.3.5. Compliance Tracking Program

A Compliance Tracking Program will track and manage compliance against the NSW and Federal approvals, UMMs, permits and licences using TfNSW's compliance monitoring system (Ngara). The Compliance Tracking Program will be maintained by the Environment and Sustainability Manager and submitted to TfNSW on a six-monthly basis.

## 7.4. Auditing

### 7.4.1. Independent audits – NSW Requirements

To satisfy NSW CoA A39, independent auditing and audit reporting for the PLR2 – EW will be carried out in accordance with the *Independent Audit, Post Approval Requirements* (DPIE, 2020). The auditing report will also be prepared in accordance with AS/NZS ISO 19011:2014 - *Guidelines for Auditing Management Systems*.

The requirements for the Independent Audit as detailed in DPIE (2020) *Independent Audit – Post Approval Requirements* are as follows:

1. An assessment of compliance with:
  - (a) All NSW and EPBC CoA applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation
  - (b) All post approval and compliance documents prepared to satisfy the CoA, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - (c) All environmental licences and approvals applicable to the development excluding EPLs issued under the POEO Act or as agreed by the Planning Secretary.
2. A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - (a) Actual impacts compared to predicted impacts documented in the Environmental Impact Assessment
  - (b) The physical extent of the development in comparison with the approved boundary
  - (c) Incidents, non-compliances and complaints that occurred or were made during the audit period
  - (d) The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
  - (e) Feedback received from the Department, and other agencies and stakeholders, including the community on the environmental performance of the Project during the audit period
3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any)
4. A high-level assessment of whether the CEMP and Sub-plans are adequate
5. Any other matters considered relevant by the auditor or the Planning Secretary, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

In accordance with NSW CoA A39, and the DPIE 2020 *Independent Audit – Post Approval Requirements*, the independent environmental audits of the PLR2 – EW will be conducted by a suitably qualified, experienced and independent team of experts in auditing. The results of the audit will be documented in an Environmental Audit Report which:

- Assesses the performance of the PLR2 – EW and its effects on the surrounding environment





- Assesses whether the PLR2 – EW is complying with the NSW and Federal approvals and the commitments in the Environmental Assessment Documentation (UMMs)
- Reviews the adequacy of any document required under the Infrastructure Approval
- Verifies compliance with this CEMP and aspect-specific Sub-plans
- Verifies compliance with any relevant legal and other requirements (e.g. licenses, permits, regulations, TfNSW guidelines, contract documentation etc)
- Recommends measures or actions to improve the environmental performance of the PLR2 – EW, and improvements to any document required under the Infrastructure Approval.

In accordance with NSW CoA A38, the Independent Auditor will be approved by the Planning Secretary before the commencement of an Independent Audit.

The first independent environmental audit will be carried out within 12 weeks of the commencement of construction, or as agreed by the Planning Secretary. Ongoing independent environmental audits will occur at intervals, no greater than 26 weeks from the date of the initial audit, or as agreed by the Planning Secretary. However, the Planning Secretary may request the independent audits to be completed at different times. If this occurs, the Planning Secretary will give one month notice to TfNSW and John Holland of the date upon which the audit will be required.

TfNSW will submit a copy of the Independent Audit Report to the Secretary with a response to any recommendations contained in the audit report for information within two months from the undertaking of the independent audit site inspection as outlined in NSW CoA A42 and the *Independent Audit Post Approval Requirements* (DPE, 2020). The Independent Audit Reports will also be provided to the Federal Minister for the Environment and Water if a non-compliance or incident relating to Protected Matters is identified.

Each Independent Audit Report and a response to any recommendations contained in the audit report will be publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.

#### 7.4.2. Independent audits – Commonwealth Requirements

Independent audits of compliance with the EPBC CoA will be conducted as requested by AG DCCEEW and at least every five years. In accordance with EPBC CoA 27, TfNSW will provide AG DCCEEW for approval. Prior to the commencement of the audit, TfNSW will agree the audit criteria with AG DCCEEW in writing. TfNSW must issue the audit report to AG DCCEEW within the timeframe specified in the approved audit criteria. John Holland will provide all assistance reasonably requested by TfNSW to meet the timeframes agreed to in the Federal approval.

John Holland will maintain accurate records substantiating all activities associated with or relevant to the EPBC CoA, including measures taken to implement all management plans required by the EPBC CoA, and make them available upon request to AG DCCEEW. Such records may be subject to audit by AG DCCEEW or an independent auditor in accordance with Section 458 of the EPBC Act, or used to verify compliance with the EPBC CoA.

#### 7.4.3. Internal audits – John Holland

Internal auditing will be undertaken by a suitably qualified auditor in accordance with John Holland's ESMS. Internal audits will be carried out at least every 12 months during construction and scheduled one month prior to the independent audits so that the outcomes of the internal audits can inform the independent audits. The internal audit scope will cover the most material environmental, social and economic issues for the PLR2 – EW and determine compliance with:

- The CEMP and Sub-plans
- Approval requirements (NSW and EPBC CoAs, UMMs)
- Any relevant legal and other requirements (e.g. licenses, permits, regulations, TfNSW guidelines, contract documentation etc).





All internal environmental audits will be undertaken in accordance with AS/NZS ISO 19011. The audit timings will be in line with timings and approach detailed in Infrastructure Sustainability Council (ISC) v2.1 Technical Manual for Design and As-Built.

#### **7.4.4. Audit of the Independent Appointments**

The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions under NSW CoA A24. This includes the ER, AA, and Community Complaints Mediator. TfNSW and John Holland will facilitate and assist the Planning Secretary in any such audit.

In accordance with NSW CoA A25, the Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with the Infrastructure Approval.

### **7.5. Reporting and identified records**

Various reports will be prepared to address the requirements of the Infrastructure Approval, commitments under the Environmental Assessment Documentation, and other reporting needs. Table 24 sets out the overarching reporting requirements for the PLR2 – EW. Further reporting requirements will be outlined in the Sub-plans, including reports, plans, strategies and procedures that will be prepared. Section 7.6.2 outlines the approach to be adopted for document control on the PLR2 – EW. Records will be made available to the Planning Secretary and AG DCCEEW upon request, within the timeframe nominated in the request.





Table 24 – Project reporting requirements

Report	Requirement	Timing	Responsibility	Recipient
<b>Monthly Environmental Report (Project Deed, Exhibit A, Annexure 13)</b>	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, compliance report and key environmental issues.	Monthly	Environment and Sustainability Manager	<ul style="list-style-type: none"> <li>TfNSW</li> </ul>
<b>Quarterly Environmental Reports (Project Deed, Exhibit A, Annexure 13)</b>	Reporting to TfNSW with any reporting requirements identified in the Project Deed and the Infrastructure Approval, including: <ul style="list-style-type: none"> <li>Details of the Tree Protection Plans in place during the reporting period, including summaries of monthly monitoring of tree protection measures; an updated Tree Register and progress of tree removals, relocations and pruning activities</li> <li>Update on the progress of the tree plantings as required under the landscape designs</li> <li>Compliance reporting against this CEMP.</li> </ul>	Quarterly	Environment and Sustainability Manager	<ul style="list-style-type: none"> <li>TfNSW</li> </ul>
<b>Compliance Tracking Program (Project Deed, Exhibit A, Annexure 6)</b>	Reporting to TfNSW using the TfNSW compliance monitoring system to track the conditions of all licences, permits and approvals to demonstrate ongoing compliance with the environment and sustainability requirements.	Every six months	Environment and Sustainability Manager	<ul style="list-style-type: none"> <li>TfNSW</li> <li>ER</li> </ul>
<b>Construction Monitoring Reports (Infrastructure Approval)</b>	Reporting the results of the monitoring conducted under the Construction Monitoring Programs, in accordance with NSW CoA C28, within Construction Monitoring Reports from the commencement of construction. Construction Monitoring Reports will include the results of monitoring including for noise and vibration, surface water quality and air quality (including odour and landfill gas). The Construction Monitoring Reports will provide an analysis of the monitoring data and detail any proposed and implemented management measures in accordance with the procedures identified in the relevant Construction Monitoring Program.	Annually (within 30 days of the end of reporting period)	Environment and Sustainability Manager	<ul style="list-style-type: none"> <li>TfNSW</li> <li>ER</li> <li>AA</li> <li>Planning Secretary</li> <li>NSW EPA</li> <li>Relevant Councils</li> <li>SOPA</li> <li>Project website</li> </ul>





Report	Requirement	Timing	Responsibility	Recipient
<b>Notification of the commencement of construction (Infrastructure Approval)</b>	The Planning Secretary will be notified in writing of the date of commencement of construction at least one month before this date in accordance with NSW CoA A36.	Once, at least one month before the commencement of construction.	Environment and Sustainability Manager / TfNSW	<ul style="list-style-type: none"> <li>ER</li> <li>AA</li> <li>Planning Secretary</li> </ul>
<b>Notification of the commencement of controlled action (Federal Approval)</b>	The AG DCCEEW will be notified in writing of the date of commencement of the controlled action within five business days following commencement of the action.	Once, within five business days following commencement of the action.	Environment and Sustainability Manager / TfNSW	<ul style="list-style-type: none"> <li>AG DCCEEW</li> </ul>
<b>ER Monthly Report (Infrastructure Approval)</b>	As per NSW CoA A30, including the information set out in the <i>Environmental Representative Protocol</i> under the heading 'Environmental Representative Monthly Reports'. John Holland will provide documentation as requested by the ER to assist the ER in developing the ER Monthly Report in accordance with NSW CoA A31.	Within seven days following the end of each month for the duration of the ER's engagement for the CSSI, (except in December which will be within 10 days following the end of the month), or as otherwise agreed by the Planning Secretary	ER	<ul style="list-style-type: none"> <li>Environment and Sustainability Manager</li> <li>TfNSW</li> <li>Planning Secretary</li> <li>Other relevant regulatory agencies</li> </ul>
<b>AA Monthly Report (Infrastructure Approval)</b>	As per NSW CoA A35, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. John Holland will provide documentation to assist the AA in developing the AA Monthly Report in accordance with NSW CoA A34.	Within seven days following the end of each month for the duration of the AA's engagement for the CSSI, (except in December which will be within 10 days following the end of the month), or as otherwise agreed by the Planning Secretary	AA	<ul style="list-style-type: none"> <li>Environment and Sustainability Manager</li> <li>TfNSW</li> <li>Planning Secretary</li> <li>Other relevant regulatory agencies</li> </ul>





Report	Requirement	Timing	Responsibility	Recipient
<b>Tree Register (Project Deed, Exhibit A, Annexure 6)</b>	<p>Updates on the status of tree removals including:</p> <ul style="list-style-type: none"> <li>▪ Tree Register and progress reporting on tree removals, relocations and pruning</li> <li>▪ Tree removals, relocations and pruning programmed for the next two months</li> <li>▪ Maintenance and monitoring progress report</li> <li>▪ Performance against the targets for 'avoidance, minimisation and management of impacts to trees' Environmental Requirements in the Contract.</li> </ul>	Monthly, and upon request	Environment and Sustainability Manager	<ul style="list-style-type: none"> <li>▪ TfNSW</li> </ul>





## 7.6. Records of environmental activities

### 7.6.1. Environmental records

The Environment and Sustainability Manager is responsible for maintaining the environmental management documents and records as current at the point of use. Types of records include:

- Monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Internal and external audit reports
- Induction and training records
- Reports on environmental incidents, non-compliances, complaints and follow-up actions
- Community engagement information
- Minutes of CEMP and ESMS management review meetings and evidence of any actions taken
- CEMP, Sub-plans, Monitoring Programs, ECMs, EWMS, CNVIS, etc.
- Compliant use of procedures and forms from the ESMS.

Environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

Only the Environment and Sustainability Manager or delegate has the authority to change the John Holland environmental management documentation. The Environment and Sustainability Manager must endorse changes prior to resubmission. This documentation will be held for five years after the actual completion date and be available to TfNSW upon request.

### 7.6.2. Document control

The Environment and Sustainability Manager will coordinate the preparation, review and distribution of John Holland's environmental documents and records. Table 24 identifies the recipients for the PLR2 – EW documentation, including CEMP and Sub-plans.

During construction, environmental documents and records will be stored electronically and at the main ancillary facility. The documents required to be prepared under the Infrastructure Approval will be made available on the PLR Stage 2 website via TfNSW (Section 5.5.5).

John Holland will implement a document control procedure as provided in the Quality Management Plan to control the flow of documents within and between TfNSW, stakeholders and sub-contractors. The procedure will ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use
- Controlled and stored for the legally required timeframe
- Removed from use when superseded or obsolete
- Archived.

A register and distribution list will identify the current revision of documents, records or data.

## 7.7. Management reviews

Periodic reviews of the ESMS and CEMP will be undertaken as part of the continual improvement processes for the PLR2 – EW through meetings of relevant personnel. Table 25 sets out the management review processes and procedures that will be implemented to monitor and review environmental performance and compliance with environmental requirements.

The outcomes of the management reviews could include amendments to this CEMP, Sub-plans and related documentation, revision to the PLR2 – EW project or ESMS, review of the risk assessment,





re-evaluation of the PLR2 – EW objectives and targets as well as input into other Project documents. For further details on the CEMP revision process, refer to Section 1.9.

Table 25 – Management Review processes

Meeting	Purpose	Frequency	Attendees
<b>Operational Leadership Team Meeting</b>	To discuss upcoming risks, program, milestones, project scope changes, review performance, and assess adequacy of project resources.	Fortnightly	<ul style="list-style-type: none"> <li>Operational Leadership Team, including Environment and Sustainability Manager</li> </ul>
<b>Environment Team Meeting</b>	To discuss upcoming activities, resourcing, and review effectiveness of controls and processes.	Weekly	<ul style="list-style-type: none"> <li>Environment team</li> </ul>
<b>Environment, Planning and Sustainability Meetings</b>	Review of status and progress of key environmental deliverables, review upcoming activities, plan site inspections and audits, review incidents and complaints and non-compliances.	Fortnightly	<ul style="list-style-type: none"> <li>Environment and Sustainability Manager</li> <li>TfNSW Senior Manager Environment and Sustainability</li> <li>ER</li> <li>AA</li> </ul>
<b>PLR2 – the Department co-ordination meetings</b>	Provide updates to the Department on the current status of construction and program, compliance updates, and details of the submission / review of Infrastructure Approval documents.	Monthly	<ul style="list-style-type: none"> <li>TfNSW Senior Manager Environment and Sustainability</li> <li>ER</li> <li>AA</li> <li>Environment and Sustainability Manager (as required)</li> </ul>
<b>Post Environmental Incident Meeting</b>	To discuss the causes leading to an incident, possible failure in systems or procedures and rectification process.	As required	<ul style="list-style-type: none"> <li>Environment team, Superintendent, Project Manager(s), construction personnel and subject matter experts as required.</li> </ul>
<b>CEMP Reviews</b>	To review the effectiveness of the CEMP, Sub-plans, and control measures, and revise if necessary.  Review the adequacy and effectiveness of the ESMS, CEMP, Sub-plans and Monitoring Programs, including through an analysis of monitoring results and system compliance.	Every 12 months	<ul style="list-style-type: none"> <li>Environment team, Superintendent, Project Manager(s), and subject matter experts as required.</li> </ul>

## 7.8. Project refinements

Modifications or refinements to the PLR2 – EW project scope may result from detailed design refinement or changed circumstances during construction, resulting in the need of a Modification or Consistency Assessment. Any design changes or changes in scope of works must be communicated to the Environment and Sustainability Manager. The Environment and Sustainability Manager (or delegate) will undertake an environmental assessment and consistency review for the proposed changes in consultation with the TfNSW Senior Manager Environment and Sustainability to determine if a Modification may be required.

Should the consistency assessment determine that a Modification is required, i.e. the impacts are of a nature and scale that it is not considered consistent with the NSW and/or Federal approvals, the ER





will be informed and a Modification application prepared under Section 5.25 of the EP&A Act. The application must include all necessary reports/studies and be lodged by TfNSW to the Planning Secretary for determination.

The TfNSW Senior Manager Environment and Sustainability will approve all refinements that are deemed consistent with the NSW and/or Federal approvals. A copy of any Consistency Assessment will be provided to the ER before the commencement of the subject work for information.

John Holland may also request from TfNSW to undertake works outlined under the flexibility provisions listed in Appendix D of the Infrastructure Approval. These represent minor logistical changes to the approved scope of works. To facilitate the acceptance of these works, the Environment and Sustainability Manager (or delegate) will provide all documentation and supporting information reasonably requested by TfNSW (or the ER as relevant) prior to the proposed application of the flexibility provisions.

Approval of a Modification or Consistency Assessment may result in the review and update of the CEMP and Sub-plans as relevant, as outlined in Section 1.9.





## Appendix A1: Secondary environmental requirements

Secondary requirements that are related, but not specific to, the development of this Plan are outlined in this appendix. Cross references are provided to indicate where the requirements are addressed in this Plan or other Project management documents. This includes:

- Secondary NSW CoA which are listed in Table 26
- Secondary UMM which are listed in Table 27.





Table 26 – Secondary Conditions of Approval

NSW CoA	Condition	Plan reference	How addressed
A1	<p>The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>(a) Parramatta Light Rail Stage 2 Environmental Impact Statement, dated November 2022</p> <p>(b) Parramatta Light Rail Stage 2 Response to Submission – Main Report, dated October 2023;</p> <p>(c) Parramatta Light Rail Stage 2 Amendment Report – Main Report, dated October 2023.</p> <p>Note: Framework documents included in the documents listed above must, where required, be updated to reflect requirements of this approval and resubmitted in compliance with a condition of this approval. Inclusion of these documents in the documents listed above does not limit the Planning Secretary's ability to request changes or further information to satisfy the requirements of any condition.</p>	<p>Section 1.1</p> <p>Section 1.2.2</p> <p>Section 1.3</p>	<p>PLR2 – EW will be carried out in accordance with the terms of the Infrastructure Approval and generally in accordance with the Environmental Assessment Documentation.</p>
A2	<p>The CSSI must be carried out in accordance with all procedures, commitments, preventative actions, performance criteria / outcomes and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.</p>	<p>Section 1.1</p> <p>Section 1.2.2</p> <p>Section 1.3</p>	<p>PLR2 – EW will be carried out in accordance with all procedures, commitments, preventative actions, performance criteria / outcomes and mitigation measures set out in the Environmental Assessment Documentation, unless otherwise specified in, or required under, the Infrastructure Approval.</p>
A3	<p>In the event of an inconsistency between:</p> <p>(a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and</p> <p>(b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>	<p>Section 1.4</p>	<p>In the event of an inconsistency between the terms of the Infrastructure Approval and the Environmental Assessment Documentation, the terms of the Infrastructure Approval will prevail to the extent of the inconsistency; and any document listed in Environmental Assessment Documentation, the most recent document will prevail to the extent of the inconsistency.</p>
A4	<p>In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.</p>	<p>Section 1.4</p>	<p>In the event that there are differing interpretations of the NSW CoA, the Planning Secretary's interpretation is final.</p>





NSW CoA	Condition	Plan reference	How addressed
A5	<p>The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:</p> <ul style="list-style-type: none"> <li>(a) the environmental performance of the CSSI;</li> <li>(b) any document or correspondence in relation to the CSSI;</li> <li>(c) any notification given to the Planning Secretary under the terms of this approval;</li> <li>(d) any audit of the Construction or Operation of the CSSI;</li> <li>(e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval);</li> <li>(f) the carrying out of any additional monitoring or mitigation measures; and</li> <li>(g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.</li> </ul>	Section 4.2.1	John Holland and its sub-contractors will comply with all written requirements or directions of the Planning Secretary.
A6	This approval lapses five (5) years after the date on which it is granted, unless Work has physically commenced on or before that date.	Section 4.2.1	The requirements of this NSW CoA are noted.
A7	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval, unless otherwise approved or required by the Planning Secretary.	Section 4.2.3	The requirements of this NSW CoA are noted.
A8	The Proponent may undertake the flexibility provisions outlined in Appendix D. Flexibility provisions in Table E.1 of the Submissions Report do not apply.	Section 7.8	To facilitate the acceptance of works under the flexibility provisions (Appendix D of the Infrastructure Approval), the Environment and Sustainability Manager (or delegate) will provide all documentation and supporting information reasonably requested by TfNSW (or the ER as relevant) prior to the proposed application of the flexibility provisions.
A9	Any action required to be undertaken within a timeframe specified in or under the terms of this approval may be undertaken within a different timeframe agreed in writing with the Planning Secretary. This condition does not apply to the written notification required in respect of an Incident or a non-compliance.	Section 3.3	The requirements of this NSW CoA are noted. Requests to the Planning Secretary in relation to this NSW CoA will be made through TfNSW.





NSW CoA	Condition	Plan reference	How addressed
A10	Any document required by this approval which requires the Planning Secretary's approval, must be approved by the Planning Secretary before the commencement of Work associated with that document.	Section 1.4	Any document required by the Infrastructure Approval which requires the Planning Secretary's approval, will be approved by the Planning Secretary before the commencement of work associated with that document.
A11	Any document required to be prepared by this approval, must be implemented unless otherwise agreed by the Planning Secretary.	Section 1.4	Any document required to be prepared by the Infrastructure Approval, will be implemented unless otherwise agreed by the Planning Secretary.
A12	Where the terms of this approval require a document or monitoring program to be prepared, or a review to be undertaken in consultation with relevant parties, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation. The evidence must include:  (a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party (c) documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations; (d) outline of the issues raised by the identified party and how they have been addressed; and (e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.	Section 1.8.1	A detailed consultation report, including matters raised by stakeholders and John Holland responses, will be prepared for each Sub-plan and Monitoring Program in accordance with NSW CoA A12.
A14	The CSSI may be constructed and operated in stages (including but not limited to temporal, location or activity-based staging). Where staged Construction and/or Operation is proposed, a Staging Report (for either or both Construction and Operation as the case may be) must be prepared. The Staging Report must be endorsed by the ER and then submitted to the Planning Secretary for information no later than one (1) month before the commencement of Construction of the first of the proposed stages of Construction (or if only staged Operation is proposed, one (1) month before the commencement of Operation of the first of the proposed stages of Operation), or as required by Condition A19.  <i>Unless otherwise specified in this approval, early works are a stage of construction unless considered to be Low Impact Work.</i>	Section 1.2.3 Section 2.3	TfNSW are responsible for developing and seeking approval of the Project Staging Report. John Holland will implement the PLR2 – EW in accordance with the Project Staging Report.







NSW CoA	Condition	Plan reference	How addressed
A15	<p>The Staging Report must:</p> <p>(a) if staged Construction is proposed, set out how the Construction of the whole of the CSSI will be staged, including details of work and activities to be carried out in each stage and the general timing of when Construction of each stage will commence and finish;</p> <p>(b) if staged Operation is proposed, set out how the Operation of the whole of the CSSI will be staged, including details of Work or other activities to be carried out in each stage and the general timing of when Operation of each stage will commence and finish (if relevant);</p> <p>(c) specify how compliance with conditions will be achieved across and between each of the stages of the CSSI; and</p> <p>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</p> <p><i>Note: A Staging Report may reflect the staged Construction and Operation of the project through geographical activities, temporal activities or activity-based contracting and staging.</i></p>	<p>Section 1.2.3</p> <p>Section 2.3</p>	<p>TfNSW are responsible for developing and seeking approval of the Project Staging Report. John Holland will implement the PLR2 – EW in accordance with the Project Staging Report.</p>
A16	<p>Where staging is proposed, the CSSI must be staged in accordance with the Staging Report.</p>	<p>Section 1.2.3</p> <p>Section 2.3</p>	<p>PLR Stage 2 will be staged in accordance with the Project Staging Report.</p>
A17	<p>Where staging is proposed, the terms of this approval that apply or are relevant to the Work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.</p> <p><i>Note: Where an inconsistency arises between the staging report and the terms of this approval, the terms of this approval prevail.</i></p>	<p>Section 1.4</p>	<p>PLR Stage 2 will be staged in accordance with the Project Staging Report. The terms of the Infrastructure Approval that apply or are relevant to PLR2 – EW will be complied with at the relevant time.</p>
A18	<p>Where changes are proposed to the staging of Construction or Operation, a revised Staging Report must be prepared, endorsed by the ER and submitted to the Planning Secretary no later than one (1) month before the proposed change in the staging.</p>	<p>Section 1.2.3</p> <p>Section 2.3</p>	<p>TfNSW are responsible for developing and seeking approval of the Project Staging Report. John Holland will implement the PLR2 – EW in accordance with the Project Staging Report.</p>
A19	<p>Strategies, plans or programs required by this approval can be submitted on a progressive basis, with the agreement of the Planning Secretary.</p> <p>With the agreement of the Planning Secretary, the Proponent may prepare the updated strategy, plan or program without undertaking all the consultation required under the applicable condition in this approval.</p> <p><i>Notes:</i></p>	<p>Section 3.3.2</p>	<p>With the agreement of the Planning Secretary, TfNSW and/or John Holland may submit any strategies, plans or programs required by the Infrastructure Approval on a progressive basis, and without undertaking all the consultation required under the applicable condition as outlined in Section 3.3.2.</p>





NSW CoA	Condition	Plan reference	How addressed
	<p>1. While a strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the activities on site are covered by suitable strategies, plans or programs at all times; and</p> <p>2. If a strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the specific stage / activities to which strategy, plan or program applies, the relationship of this stage / activity to future stages / activities, and the trigger for updating the strategy, plan or program.</p>		
A20	If a Construction Environmental Management Framework (CEMF) is submitted for approval under Condition C1, the Staging Report must be submitted before or with the CEMF, i.e. no later than one (1) month before the lodgement of any CEMP, CEMP sub plan or CMP to the Planning Secretary for approval.	Section 1.2.3 Section 1.2.5 Section 2.3	TfNSW are responsible for developing and seeking approval of the CEMF and Project Staging Report. John Holland will implement the PLR2 – EW in accordance with the approved CEMF and Project Staging Report.
A23	All Independent Appointments required by the terms of this approval must have regard to <i>Seeking approval from the Department for the appointment of independent experts</i> (DPIE, 2020). All Independent Appointments must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments.
A24	<p>The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must:</p> <p>(a) facilitate and assist the Planning Secretary in any such audit; and</p> <p>(b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.</p>	Section 7.4.4	TfNSW and John Holland will facilitate and assist the Planning Secretary in any such audit commissioned by the Planning Secretary.
A25	<p>The Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval.</p> <p><i>Note: Conditions A24 and A25 apply to all Independent Appointments including the ER, AA, and Community Complaints Mediator</i></p>	Section 7.4.4	The requirements of this NSW CoA are noted.
A26	More than one (1) Independent Appointment(s) may be engaged for the CSSI, in which case the functions to be exercised by the Independent Appointments under the terms of this approval may be carried out by any Independent Appointments that are approved by the Planning Secretary for the purposes of the CSSI.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments.





NSW CoA	Condition	Plan reference	How addressed
	<i>Note: The intent is to allow for multiple ER or AA appointments to undertake the functions of the role as required by the terms of the approval.</i>		
A27	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the ER, and seeking approval from the Planning Secretary.
A28	The Planning Secretary's approval of an ER must be sought no later than one (1) month before the commencement of Work.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the ER, and seeking approval from the Planning Secretary. Work for the PLR2 – EW will not commence until the ER has been approved by the Planning Secretary.
A29	The proposed ER must meet the requirements of the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018) and must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in Condition A1, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the ER, and seeking approval from the Planning Secretary.
A30	For the duration of the Work until the commencement of Operation / 6 months after the completion of Construction, or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in Conditions A14, C1, C4, C9, C14 and C20 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or	Section 5.1.3	John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW or the ER (and within the time requested by TfNSW or the ER) in connection with a request under this condition.





NSW CoA	Condition	Plan reference	How addressed
	<p>(ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary/Department);</p> <p>(e) regularly monitor the implementation of the documents listed in Conditions A14, C1, C4, C9, C14 and C20 to ensure implementation is being carried out in accordance with the document and the terms of this approval;</p> <p>(f) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A39 of this approval;</p> <p>(g) as may be requested by the Planning Secretary, assist in the resolution of community complaints;</p> <p>(h) review and determine the appropriateness of any activities reliant on the definition of Low Impact Work;</p> <p>(i) consider or assess the impacts of minor construction ancillary facilities as required by Condition C7 of this approval;</p> <p>(j) consider any minor amendments to be made to the Ancillary Facility Site Establishment Management Plan, CEMP, CEMP Sub-plans and Construction monitoring programs without increasing impacts to nearby sensitive land uses or that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the Ancillary Facility Site Establishment Management Plan, CEMP, CEMP Sub-plans and Construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; and</p> <p>(k) prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI, (except in December which will be within 10 days following the end of the month), or as otherwise agreed by the Planning Secretary;</p> <p><i>Note: The written statement / submission by point (d) must be made via the Major Projects Portal to the Planning Secretary advising the documents have been endorsed.</i></p>		





NSW CoA	Condition	Plan reference	How addressed
A31	<p>The Proponent must provide the ER with documentation requested in order for the ER to perform their functions specified in Condition A30 (including preparation of the ER monthly report), as well as:</p> <p>(a) the complaints register (to be provided on a weekly basis where complaints have been received or as requested); and</p> <p>(b) a copy of any assessment carried out by the Proponent of whether proposed Work is consistent with the approval (which must be provided to the ER before the commencement of the subject Work).</p> <p><i>Note: Personal details of the complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.</i></p>	Section 5.1.3	John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW or the ER (and within the time requested by TfNSW or the ER) in connection with a request under this condition.
A32	<p>A suitably qualified and experienced Acoustics Advisor(s) (AA) in noise and vibration management, who is independent of the design and construction personnel, must be nominated by the Proponent and engaged for the duration of Work and for no less than six (6) months following completion of Construction of the CSSI, or unless otherwise agreed with the Planning Secretary.</p>	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the AA and seeking approval from the Planning Secretary.
A33	<p>Work must not commence until an AA has been approved by the Planning Secretary no later than one (1) month before commencement of Work.</p>	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the AA and seeking approval from the Planning Secretary.
A34	<p>The Proponent must cooperate with the AA by:</p> <p>(a) providing access to noise and vibration monitoring activities as they take place;</p> <p>(b) providing for review of noise and vibration plans, assessments, monitoring reports, data and analyses undertaken (including but not limited to CEMPs, CNVIS and Out-of-hours- Works);</p> <p>(c) providing the complaints register (to be provided on a weekly basis where complaints have been received or as requested); and</p> <p>(d) considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted.</p> <p><i>Note: Personal details of the complainant are not to be provided to the AA unless otherwise agreed to or requested by the complainant.</i></p>	Section 5.1.3	John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW or the AA (and within the time requested by TfNSW or the AA) in connection with a request under this condition.
A35	<p>The approved AA must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the performance of the CSSI in relation to noise and vibration;</p>	Section 5.1.3	John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW or the AA (and







NSW CoA	Condition	Plan reference	How addressed
	<p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval relating to noise and vibration;</p> <p>(c) consider and recommend to the Proponent, improvements that may be made to avoid or minimise adverse noise and vibration impacts;</p> <p>(d) review proposed night-time works to determine if sleep disturbance would occur and recommend measures to avoid sleep disturbance or appropriate additional alternative mitigation measures;</p> <p>(e) review noise and vibration documents required to be prepared under the terms of this approval (including but not limited to CEMPs, CNVIS and Out-of-hours-Works), and should they be consistent with the terms of this approval, endorse them before submission to the Planning Secretary (if required to be submitted to the Planning Secretary) or before implementation (if not required to be submitted to the Planning Secretary);</p> <p>(f) regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of this approval to ensure implementation is in accordance with what is stated in the document(s) and the terms of this approval;</p> <p>(g) notify the Planning Secretary of noise and vibration incidents and non-compliances in accordance with Conditions A44 and A46 of this approval;</p> <p>(h) in conjunction with the ER, the AA must:</p> <p>(i) as may be requested by the Planning Secretary or Community Complaints Mediator (required by Condition B11), help plan, attend or undertake audits of noise and vibration management of the CSSI including briefings, and site visits,</p> <p>(ii) in the event that conflict arises between the Proponent and the community in relation to the noise and vibration performance of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B4 to attempt to resolve the conflict, and if it cannot be resolved, notify the Planning Secretary,</p> <p>(iii) consider relevant minor amendments made to the Ancillary Site Establishment Management Plan, CEMP, relevant sub-plans and noise and vibration monitoring programs that require updating or are of an administrative nature, and are consistent with the terms of this approval and the management plans and monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, endorse the amendment, (this does not include any modifications to the terms of this approval),</p> <p>(iv) review the noise impacts of minor ancillary facilities as defined in Condition C7, and</p>		<p>within the time requested by TfNSW or the AA) in connection with a request under this condition.</p>





NSW CoA	Condition	Plan reference	How addressed
	(v) prepare and submit to the Planning Secretary and other relevant regulatory agencies (where requested by those agencies), for information, a Monthly Noise and Vibration Report detailing the AA's actions and decisions on matters for which the AA was responsible in the preceding month. The Monthly Noise and Vibration Report must be submitted within seven (7) days following the end of each month for the duration of the AA's engagement for the CSSI, (except in December which will be within 10 days following the end of the month), or as otherwise agreed by the Planning Secretary.		
A36	The Planning Secretary must be notified in writing of the dates of commencement of Work, Construction and Operation at least one (1) month before those dates.	Section 7.5	The Planning Secretary will be notified in writing of the date of commencement of construction at least one month before this date in accordance with NSW CoA A36. John Holland are not responsible for Operations in accordance with the Project Staging Report.
A37	If the Construction or Operation of the CSSI is to be staged, the Planning Secretary must be notified in writing at least one (1) month before the commencement of each stage, of the date of the commencement of the relevant Work, Construction and Operation at least one (1) month before those dates.	Section 1.2.3 Section 2.3 Section 7.5	TfNSW are responsible for developing and seeking approval of the Project Staging Report. John Holland will implement the PLR2 – EW in accordance with the Project Staging Report. The Planning Secretary will be notified in writing of the date of commencement of construction at least one month before this date in accordance with NSW CoA A36. John Holland are not responsible for Operations in accordance with the Project Staging Report.
A38	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit. This condition does not apply to the engagement of auditors required under Condition E124.	Section 7.4.1	TfNSW are responsible for engaging the independent auditor and seeking approval from the Planning Secretary.
A39	Independent Audits of the CSSI must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020).	Section 7.4.1	TfNSW will comply with NSW CoA A39. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition. John Holland will implement recommended measures or actions arising from





NSW CoA	Condition	Plan reference	How addressed
			the Environmental Audit Program and Environmental Audit Reports.
A40	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020), upon giving at least four (4) weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	Section 7.4.1	The requirements of this NSW CoA are noted.
A41	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020), the Proponent must:  (a) review and respond to each Independent Audit Report prepared under Condition A39 or Condition A40;  (b) submit the response to the Planning Secretary; and  (c) make each Independent Audit Report and response to it publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.	Section 7.4.1	TfNSW will comply with NSW CoA A41. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition. John Holland will implement recommended measures or actions arising from the Environmental Audit Program and Environmental Audit Reports.
A42	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two (2) months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020).	Section 7.4.1	TfNSW will comply with NSW CoA A42. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition. John Holland will implement recommended measures or actions arising from the Environmental Audit Program and Environmental Audit Reports.
A44	The Planning Secretary must be notified via the Major Projects Website within 24 hours after the Proponent becomes aware of an Incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and nature of the incident.	Section 6.4	Incidents that meet the criteria outlined in the Infrastructure Approval will be notified verbally immediately to the TfNSW Senior Environment and Sustainability Manager and ER. Incident reports will be provided to TfNSW and ER. TfNSW will provide written notification to the Planning Secretary in accordance with the TfNSW Environmental Incident Procedure.





NSW CoA	Condition	Plan reference	How addressed
A45	Subsequent written notification must be given and reports submitted in accordance with the requirements set out in Appendix A of this approval.	Section 6.4	TfNSW will comply with NSW CoA A45. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition.
A46	The Planning Secretary must be notified via the Major Projects Website within seven (7) days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 7.3.1	TfNSW will comply with NSW CoA A46. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition. A non-compliance which has been notified as an incident does not need to also be notified to the Planning Secretary as a non-compliance.
A47	A non-compliance which has been notified as an Incident under Condition A44 does not need to be notified as a non-compliance.	Section 7.3.1	TfNSW will comply with NSW CoA A47. A non-compliance which has been notified as an incident does not need to also be notified to the Planning Secretary as a non-compliance.
A48	The CSSI name; application number; telephone number, postal address and email address required under Condition B6 of this approval must be made available on boundary fencing / hoarding at each ancillary facility before the commencement of Construction. This information must also be provided on the website required under Condition B15 of this approval.	Section 2.4.4 Section 5.5.5	The CSSI name; application number; telephone number, postal address and email address required under NSW CoA B6 of the Infrastructure Approval will be made available on boundary fencing / hoarding at each ancillary facility before the use of the ancillary facility (Section 2.4.4). This information will also be provided on the Project website required under NSW CoA B15 (Section 5.5.5).
B1	A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication about Construction and Operation of the CSSI with:  (a) the community (including adjoining affected landowners and businesses, and others directly impacted by the CSSI);	Section 5.5.3.1 Section 5.5.3.2	TfNSW are responsible for developing and seeking approval of the CCS. John Holland will implement the CCS through the implementation of the CEP.





NSW CoA	Condition	Plan reference	How addressed
	<p>(b) Aboriginal people, Registered Aboriginal Parties (RAPs) and LALCs; and</p> <p>(c) the relevant councils.</p>		
<b>B2</b>	<p>The Community Communication Strategy must:</p> <p>(a) identify people, organisations, councils to be consulted during the design and work phases of the CSSI;</p> <p>(b) identify details of the community and its demographics;</p> <p>(c) identify timing of consultation;</p> <p>(d) set out procedures and mechanisms for the regular distribution of accessible information including to LOTE and CALD and vulnerable communities about or relevant to the CSSI;</p> <p>(e) identify opportunities for education within the community about construction sites;</p> <p>(f) detail the measures for advising the community in advance of upcoming Work, upcoming out-of-hours work as required by Condition E33 including:</p> <p>(i) justification and description of the potential work, location and duration of the out-of-hours work;</p> <p>(ii) the noise characteristics and likely noise levels of the work; and</p> <p>(iii) likely mitigation and management measures which aim to achieve the relevant noise management levels and vibration criteria under Condition E35 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).</p> <p>(g) provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for the CSSI;</p> <p>(h) set out procedures and mechanisms:</p> <p>(i) through which the community can discuss or provide feedback to the Proponent;</p> <p>(ii) through which the Proponent will respond to enquiries or feedback from the community;</p> <p>(iii) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the CSSI, including disputes regarding rectification or compensation; and</p> <p>(i) address who will engage with the community, relevant council(s) and agencies.</p>	<p>Section 5.5.3.1</p> <p>Section 5.5.3.2</p>	<p>TfNSW are responsible for developing and seeking approval of the CCS. John Holland will implement the CCS through the implementation of the CEP.</p>







NSW CoA	Condition	Plan reference	How addressed
B3	Work for the purposes of the CSSI must not commence until the Community Communication Strategy has been approved by the Planning Secretary.	Section 5.5.3.1 Section 5.5.3.2	TfNSW are responsible for developing and seeking approval of the CCS. John Holland will implement the CCS through the implementation of the CEP.
B4	The Community Communication Strategy must be submitted for the Planning Secretary's approval no later than one (1) month before commencement of Work and the approved strategy implemented for the duration of Work and for 12 months following the completion of Construction.	Section 5.5.3.1 Section 5.5.3.2	TfNSW are responsible for developing and seeking approval of the CCS. John Holland will implement the CCS through the implementation of the CEP. TfNSW will continue to implement the CCS during other stages of PLR Stage 2 and for 12 months following completion of construction.
B5	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of Work and for a minimum for 12 months following completion of Construction of the CSSI.  <i>Note: In the situation where there are different entities constructing and operating the CSSI, continuity of access to the Complaints Management System must be maintained.</i>	Section 5.5.4	The requirements of NSW CoA B5 and UMM SE3 will be satisfied by TfNSW prior to commencement of work on PLR2 – EW and maintained for 12 months following completion of construction. Refer to the CCS and CEP for further details on communication processes.
B6	<p>The following information must be available to facilitate community enquiries and manage complaints one month before the commencement of Work and for 12 months following the completion of construction:</p> <ul style="list-style-type: none"> <li>(a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI;</li> <li>(b) a postal address to which written complaints and enquires may be sent;</li> <li>(c) an email address to which electronic complaints and enquiries may be transmitted; and</li> <li>(d) "a mediation system for complaints unable to be resolved.</li> </ul> <p>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</p>	<p>Section 5.5.3.1 Section 5.5.3.2 Section 5.5.4 CCS CEP</p>	The requirements of this NSW CoA will be satisfied by TfNSW prior to commencement of work on PLR2 – EW and maintained for 12 months following completion of construction. Refer to the CCS and CEP for further details on communication processes.





NSW CoA	Condition	Plan reference	How addressed
B7	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any Work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:	Section 5.5.4 CCS CEP	The requirements of this NSW CoA will be satisfied by TfNSW prior to commencement of work on PLR2 – EW and maintained for 12 months following completion of construction.  John Holland will notify TfNSW of any complaints it receives and provide all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition. Refer to the CCS and CEP for further details on communication processes.
	(a) number of complaints received;		
	(b) the date and time of the complaint;		
	(c) the method by which the complaint was made;		
	(d) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;		
	(e) nature of the complaint;		
	(f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and		
	(g) "if no action was taken, the reason(s) why no action was taken.		
B8	<p>Complainants must be advised of the following information before, or as soon as practicable after, providing personal information:</p> <p>(a) the Complaints Register may be forwarded to government agencies, including the Planning Secretary and its representatives (including independent appointments such as the ER, or AA), to allow them to undertake their regulatory duties;</p> <p>(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies;</p> <p>(c) the supply of personal information by the complainant is voluntary; and</p> <p>(d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement).</p> <p>The Collection Statement must be included on the Proponent's or CSSI's website to make prospective complainants aware of their rights under the <i>Privacy and Personal Information Protection Act 1998</i></p>	Section 5.5.4 CCS CEP	Complainants will be advised of the information outlined in NSW CoA B8 before, or as soon as practicable after, providing personal information. A Collection Statement will also be included on the TfNSW Project website to make prospective complainants aware of their rights under the <i>Privacy and Personal Information Protection Act 1998</i> (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement. Refer to the CCS and CEP for further details on communication processes.





NSW CoA	Condition	Plan reference	How addressed
	<p>(NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.</p> <p>Notes:</p> <ol style="list-style-type: none"> <li>For any complaints made in person, the complainant must be made aware of the Collection Statement.</li> <li>Should a complainant disagree with the collection statement, a note to that effect must be recorded in the Complaints Register.</li> </ol>		
B9	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Section 5.5.4 CCS CEP	The Complaints Register will be provided to the Planning Secretary on request in accordance with NSW CoA B9.
B10	<p>A Community Complaints Mediator that is:</p> <ol style="list-style-type: none"> <li>independent of the design and construction personnel; and</li> <li>accredited under the National Mediator Accreditation System, administered by the Mediator Standards Board, unless otherwise agreed by the Planning Secretary,</li> </ol> <p>must be nominated by the Proponent and approved by the Planning Secretary one (1) month before the commencement of Work. Once approved the Proponent must engage the Community Complaints Mediator for the duration of Work and for a period of 12 months after Operation.</p>	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the Community Complaints Mediator and seeking approval from the Planning Secretary.
B11	The role of the Community Complaints Mediator is to address any complaint where a member of the public has lodged a complaint and is not satisfied by the Proponent's response following completion of the process outlined within the Community Communication Strategy listed within Condition B1. Any member of the public that has lodged a complaint which is registered in the Complaints Management System identified in Condition B5, and that complaint is unresolved may ask the Community Complaints Mediator to review the Proponent's response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public.	Section 5.1.3	TfNSW will comply with NSW CoA B11, relying on information provided by John Holland to TfNSW. John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition.
B12	<p>The Community Complaints Mediator will:</p> <ol style="list-style-type: none"> <li>review unresolved disputes if the procedures and mechanisms under Condition B2(h) (iii) do not satisfactorily address complaints;</li> </ol>	Section 5.1.3	TfNSW will comply with NSW CoA B12, relying on information provided by John Holland to TfNSW. John Holland will provide all documents, information, assistance and co-operation





NSW CoA	Condition	Plan reference	How addressed
	<p>(b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and</p> <p>(c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one (1) month of the recommendations being made.</p>		reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition.
<b>B13</b>	The Proponent must implement the recommendations made by the Community Complaints Mediator in accordance with Condition B12 within a timeframe agreed with the Community Complaints Mediator, unless otherwise agreed with the Planning Secretary.	Section 5.1.3	John Holland will implement the recommendations made by the Community Complaints Mediator in accordance with NSW CoA B12 within a timeframe agreed with the Community Complaints Mediator, unless otherwise agreed with the Planning Secretary.
<b>B14</b>	The Community Complaints Mediator will not act before the Complaints Management System required by Condition B5 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the Community Complaints Mediator. The Community Complaints Mediator will not act before the Complaints Management System required by NSW CoA B5 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in the Infrastructure Approval or clear government policy and resolution processes are available, or matters which are not within the scope of the CSSI.
<b>B15</b>	<p>A website or webpage providing information in relation to the CSSI must be established before commencement of Work and be maintained for the duration of Construction, and for a minimum of 24 months following the completion of Construction or unless an alternative timeframe is agreed by the Planning Secretary. The following up-to-date information (excluding confidential, personal, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant Work commences and maintained on the website or dedicated pages including:</p> <p>(a) information on the current implementation status of the CSSI;</p> <p>(b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval;</p>	Section 5.5.5	TfNSW will comply with NSW CoA B15, relying on information provided by John Holland to TfNSW. John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition.





NSW CoA	Condition	Plan reference	How addressed
	<p>(c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval;</p> <p>(d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI;</p> <p>(e) a copy of the current version of each document required under the terms of this approval; and</p> <p>(f) a copy of the audit reports required under this approval.</p> <p>Where the information / document relates to a particular Work or is required to be implemented, it must be published before the commencement of the relevant Work to which it relates or before its implementation.</p> <p>All information required in this condition must be provided on the Proponent's website, ordered in a logical sequence, easy to navigate, searchable and documents titles clearly presented.</p> <p>Notes:</p> <ol style="list-style-type: none"> <li><i>The intention of this condition is to increase transparency and for information/documents required as part of the approval to be provided proactively and publicly in an easily accessible manner. Where information is excepted by this condition, it is intended that these documents are provided in their redacted form.</i></li> <li><i>The Planning Secretary may instruct the Proponent to finalise and upload any report or documents to the Project's website in accordance with Condition A5.</i></li> <li><i>The publishing of documents must occur before the relevant Work / activity is going to commence, unless otherwise agreed with the Secretary.</i></li> <li><i>In determining what information should be published under this condition, the proponent should have regard to the principles in Division 2 of Part 2 of the Government Information (Public Access) Act, 2009.</i></li> <li><i>Documents should be named to be consistent with the conditions of approval where possible. The name should also give an overall impression of what the document is about. The names should be simple and concise (no more than 50 characters) without any unnecessary punctuation or under scoring in the title.</i></li> </ol>		
B16	Where the agreement of the Planning Secretary is sought to cease providing information via a website or webpage in accordance with Condition B15, the Proponent must demonstrate:	Section 5.5.5	TfNSW will comply with NSW CoA B16.







NSW CoA	Condition	Plan reference	How addressed
	<p>(a) operational compliance through independent audits completed in accordance with Condition A41; and</p> <p>(b) how the public can request access to information that will no longer be available through a website or webpage.</p>		
C1	<p>A Construction Environmental Management Framework (CEMF) may be prepared to facilitate the preparation and approval of construction environmental management and monitoring plans required under Part C of this approval. The CEMF must:</p> <p>(a) identify the Construction Environmental Management Plans (CEMPs), CEMP Sub-plans and Construction Monitoring Programs (CMP) required for each stage of Construction consistent with the Staging Report prepared under Condition A14;</p> <p>(b) document the proposed structure of the CEMPs, CEMP Sub-plans and CMPs for the relevant stage of Construction;</p> <p>(c) provide, by way of a Risk Matrix, an assessment of the predicted level of environmental and social risk, including the potential level of community concerns posed by each Construction stage. This must use a process consistent with AS/NZS ISO 31000: 2018; Risk Management – Guidelines; and</p> <p>(d) nominate the consultation and endorsement level for the CEMPs, CEMP Sub-plans and CMPs required for each Construction stage. The endorsement level being one of the following:</p> <p>(i) Low Risk Stage – to be self endorsed and consultation with stakeholders is not mandatory,</p> <p>(ii) Medium Risk Stage – to be endorsed by the ER and consultation with stakeholders required, and</p> <p>(iii) High Risk Stage– to be approved by the Planning Secretary and consultation with stakeholders required.</p> <p>For a Low Risk Stage(s) the requirements of Conditions C4 to C28 of this approval do not apply. In these circumstances, a CEMP, CEMP sub-plan and CMP, may be substituted with an alternate process such as a Construction Method Statement or the like.</p> <p>The CEMF must be prepared in consultation with the ER and then submitted no later than one (1) month before the lodgement of any CEMP, CEMP sub plan or CMP to the Planning Secretary for approval.</p> <p>Notes:</p>	Section 1.2.5	To facilitate the preparation and approval of CEMPs, Sub-plans and Construction Monitoring Programs prior to and during the construction phase of PLR Stage 2, TfNSW have developed a CEMF in accordance with NSW CoA C1. TfNSW are responsible for seeking approval of the CEMF. The CEMP and Sub-plans will not be submitted to the Planning Secretary until at least one month following the submission of the CEMF to the Planning Secretary for approval.





NSW CoA	Condition	Plan reference	How addressed
	<p>1. The Planning Secretary may vary the CEMF in relation to the endorsement authority for the CEMPs, CEMP Sub-plans and CMPs.</p> <p>2. The intent is for staging and not activities within a stage.</p>		
C2	The approved CEMF must be implemented for the duration of Construction.	Section 1.2.5	The approved CEMF will be implemented for the duration of construction. This CEMP and Sub-plans have been prepared in accordance with relevant requirements of the CEMF.
C3	Where changes are proposed to the staging of Construction, a revised CEMF must be prepared, endorsed by the ER and submitted to the Planning Secretary for approval no later than one (1) month prior to the proposed change in the staging.	Section 1.2.5	TfNSW are responsible for developing and seeking approval of the CEMF. John Holland will comply with the requirements of the CEMF following Planning Secretary approval.
C6	Once an ancillary facility is no longer required for the CSSI, the land must be returned to its pre-existing or better condition within six (6) months of the site being decommissioned or within two (2) years of Operation (whichever is the earliest).	Section 2.4.4	Once a Construction Ancillary Facility is no longer required for PLR Stage 2, the land will be returned to its pre-existing or better condition within six (6) months of the facility being decommissioned or within two years of operation (whichever is the earliest). Construction Ancillary Facilities used for PLR2 – EW may be transferred to TfNSW or other PLR Stage 2 contractors for delivery of Stage B and reinstated to satisfy NSW CoA C6.
C7	<p>Minor Ancillary Facilities can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:</p> <p>(a) are located within or immediately adjacent to the construction boundary; and</p> <p>(b) have been assessed by the ER to have:</p> <p>(i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009) (ICNG), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts; and</p> <p>(ii) minimal environmental impact with respect to waste management and flooding, and</p>	Section 2.4.5	Minor Ancillary Facilities assessed in the Environmental Assessment Documentation can be used for construction without needing approval from the ER. For Minor Ancillary Facilities not included in the Environmental Assessment Documentation, the Environment and Sustainability Manager (or delegate) will prepare minor ancillary facilities assessments for review and approval by the ER in accordance with NSW CoA C7.





NSW CoA	Condition	Plan reference	How addressed
	(iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.		
C8	Boundary screening must be erected between ancillary facilities (excluding minor ancillary facilities) and adjacent to sensitive land use(s) for the duration of the time that the ancillary facility is in use, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s).  Boundary screening should aim to minimise visual impacts on adjacent sensitive land use(s).	Section 2.4.4	Boundary screening will be erected around all Construction Ancillary Facilities (excluding minor ancillary facilities) that are adjacent to sensitive land uses for the duration of construction in accordance with NSW CoA C8, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s). Boundary screening will minimise, as far as practicable, visual impacts on adjacent sensitive receivers.
C20	The following Construction Monitoring Program must be prepared in consultation with the relevant government agencies and council(s) 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:  (a) Required Construction Monitoring Programs: Noise and Vibration; Relevant government agencies to be consulted for each Construction Monitoring Program: EPA, SOPA and relevant council(s).  <i>Note: Consultation with SOPA is only relevant where SOPA lands are affected.</i>	Section 7.2 NVMP	Details of the Noise and Vibration Monitoring Program are provided in Section 7.2. Also refer to the NVMP (Appendix B3) for the Noise and Vibration Monitoring Program.
C21	Each Construction Monitoring Program (CMP) must be consistent with SMART principles and provide: (a) details of baseline data available; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the CSSI to be undertaken; (d) the parameters of the CSSI to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis of results against relevant criteria will be undertaken (including trends in the data, including maximum, minimum and average data results for all monitored parameters); (h) details of the methods that will be used to analyse the monitoring data;	Section 7.2 NVMP SWMP AQMP	The requirements of the Monitoring Programs are provided in Section 7.2. Also refer to the relevant Sub-plans for copies of the Monitoring Programs.





NSW CoA	Condition	Plan reference	How addressed
	(i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable impacts; (j) consideration of SMART principles; and (k) any consultation to be undertaken in relation to the monitoring programs.		
C22	CMPs must be submitted to the Planning Secretary for approval except those permitted to be endorsed by others pursuant to a CEMF approved by the Planning Secretary under Condition C1.	Section 7.2	Approval requirements for the Monitoring Programs is provided in Section 7.2. Monitoring Programs will be submitted to the Planning Secretary for approval except those permitted to be endorsed by others pursuant to the CEMF.
C23	Where a CMP requires Planning Secretary's approval, the CMP must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction, or where Construction is staged, no later than one (1) month before the commencement of each stage.	Section 7.2	Approval requirements for the Monitoring Programs is provided in Section 7.2. Monitoring Programs will be submitted to the Planning Secretary for approval following ER endorsement no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.
C24	CMP(s) not requiring the Planning Secretary's approval, but requiring ER endorsement, must be submitted to the ER no later than one (1) month before the commencement of Construction or where Construction is staged no later than one (1) month before the commencement of that stage. The CMP(s) must be endorsed by the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.	Section 7.2	Approval requirements for the Monitoring Programs is provided in Section 7.2. Monitoring Programs will be submitted to the Planning Secretary or ER (as relevant) for endorsement no later than one month before the commencement of construction, or where construction is staged, no later than one month before the commencement of each stage.
C25	Construction must not commence until the relevant CMP(s) have been approved by the Planning Secretary or endorsed by the ER, (as applicable and as identified in the CEMF approved under Condition C1), and all relevant baseline data for the specific construction activity has been collected.	Section 7.2	Construction of the PLR2 – EW will not commence until the Monitoring Programs have been approved by the Planning Secretary or endorsed by the ER (as relevant) and all relevant baseline data for the specific construction activity has been collected.





NSW CoA	Condition	Plan reference	How addressed
C26	The CMP(s), as approved or endorsed (as relevant), including any minor amendments approved by the ER, must be implemented for the duration of Construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	Section 7.2	The Monitoring Programs including any minor amendments approved by the ER, will be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.
C27	The results of the construction monitoring must be uploaded to the project website (required by Condition B15) in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP and submitted to the Planning Secretary and relevant regulatory agencies upon request.	Section 7.2 Section 7.5	The results of the construction monitoring will be uploaded to the TfNSW Project website in the form of a Construction Monitoring Report at the frequency identified in the relevant Monitoring Program and submitted to the Planning Secretary and relevant regulatory agencies upon request.
C28	The Construction Monitoring Report must provide an analysis of the monitoring data and detail any proposed and implemented management measures in accordance with the procedures identified in the relevant CMP.  <i>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</i>	Section 7.5	The Construction Monitoring Reports will provide an analysis of the monitoring data and detail any proposed and implemented management measures in accordance with the procedures identified in the relevant Construction Monitoring Program.
E54	The CSSI must be constructed in a manner that minimises visual impacts of construction sites, including providing temporary decorative hoarding, landscaping and vegetative screening, minimising light spill, or incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, including recognition of Country.	Section 2.4.3	The PLR2 – EW will be constructed in a manner that minimises visual impacts of construction sites, including providing temporary decorative hoarding, landscaping and vegetative screening, minimising light spill, or incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, including recognition of Country.
E56	The place making, design and landscape outcomes of the CSSI must be:  (a) informed by and be consistent with Technical Paper 1 – Design Place and Movement of the EIS and Design, Place and Movement Supplementary Report, including but not limited to the objectives and design principles, requirements, and opportunities for green track, permeable surfaces and wire-free locations adjacent to green space, environmentally sensitive land and residential;	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.







NSW CoA	Condition	Plan reference	How addressed
	<p>(b) prepared in consultation with the community (including the affected landowners and businesses or a representative of the businesses), LALCs, RAPs, SOPA and relevant council(s); and</p> <p>(c) designed with consideration of relevant land use changes, masterplans, initiatives, and existing and proposed future local context and character determined at the time of approval of this instrument.</p>		
E57	<p>The CSSI must be designed to:</p> <p>(a) minimise visual and amenity impacts and change to existing landforms;</p> <p>(b) minimise overshadowing;</p> <p>(c) explore opportunities to provide unobstructed access for pedestrians, incorporate ecological sensitive design, aesthetics, wayfinding and public art into the detailed design; and</p> <p>(d) prioritise co-location with existing infrastructure.</p>	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
E58	<p>The CSSI must be constructed and operated to minimise light spill to surrounding property and ecologically sensitive areas. Lighting associated with the construction and operation of the CSSI must be consistent with the requirements of AS/NZS 4282:2019 <i>Control of the obtrusive effects of outdoor lighting</i>, relevant Australian Standards in the series AS/NZ 1158 – <i>Lighting for Roads and Public Spaces</i> and the <i>National Light Pollution Guidelines for Wildlife</i> (Dept Climate Change, Energy, the Environment and Water, 2023). Mitigation measures must be provided to manage residual impacts of lighting to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.</p>	Section 2.5	The PLR2 – EW will be designed and constructed to minimise light spill to surrounding properties and ecologically sensitive areas and in accordance with the guidelines listed in NSW CoA E58.
E59	<p>The placement, obstruction (in relation to existing) and removal of CCTV cameras must be undertaken in consultation with the CCTV asset owner, adjoining or adjacent property owners and the relevant public authority and relevant Council(s).</p>	Section 2.6	The placement, obstruction (in relation to existing) and removal of CCTV cameras will be undertaken in consultation with the CCTV asset owner, adjoining or adjacent property owners and the relevant public authority and relevant Council(s).
E60	<p>Temporary and permanent active transport facilities must be designed, constructed and/or rectified in accordance with:</p> <p>(a) the process set out in the <i>Movement and Place Framework</i> (NSW Government) including:</p> <p>(i) the <i>Walking Space Guide: Toward Pedestrian Comfort and Safety</i> (TfNSW, 2020); and</p> <p>(ii) the <i>Cycleway Design Toolbox: Designing for Cycling and Micromobility</i> (TfNSW, 2020).</p>	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.





NSW CoA	Condition	Plan reference	How addressed
	<p>(b) the <i>Guide to Road Design Part 6A: Paths for Walking and Cycling</i> (Austroads 2017) where not otherwise covered by (a) above;</p> <p>(c) relevant Australian Standards (AS) such as AS 1428.1-2009 <i>Design for access and mobility</i>; and</p> <p>(d) relevant Crime Prevention Through Environmental Design (CPTED) principles.</p> <p><i>Note: In the event of an inconsistency, the latest guidance document prevails to the extent of the inconsistency.</i></p>		
E61	<p>An independent Design Review Panel (DRP) must be established, to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The DRP must be formed and hold its first meeting within six (6) months of the date of this approval, unless otherwise agreed by the Planning Secretary.</p> <p><i>Note: Nothing in this approval prevents the use of an existing design review panel as the DRP convened for this CSSI where the function and composition of that panel complies with the terms of this approval.</i></p>	Section 5.1.4	TfNSW are responsible for engaging the DRP.
E62	<p>The responsibilities of the DRP include:</p> <p>(a) providing advice on the application of the objectives to key design elements in relation to urban and landscape design (including public art), open space, heritage, accessibility; place making, architecture, and aesthetic aspects of the CSSI.</p> <p>(b) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI, including in relation to:</p> <p>(i) Connecting with Country Framework (DPE, 2023)</p> <p>(ii) the Heritage Interpretation Strategy including integration of cultural heritage required by Condition E16,</p> <p>(iii) bridge design;</p> <p>(iv) green-track locations;</p> <p>(v) wire-free locations;</p> <p>(vi) permeable surfaces;</p> <p>(vii) the tree replacement requirements of Conditions E77 and E78; and</p>	Section 5.1.4	TfNSW are responsible for engaging the DRP, developing and seeking endorsement of the DRP Terms of Reference, and operating and managing the DRP in accordance with the endorsed DRP Terms of Reference.





NSW CoA	Condition	Plan reference	How addressed
	<p>(viii) lessons learnt from Critical State Significant Infrastructure 8285 (Stage 1).</p> <p>Advice from the DRP that is incorporated into the project design must be generally consistent with the CSSI as approved.</p>		
E63	<p>The DRP must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, suitably qualified, experienced and independent professional(s) in each of the fields of:</p> <ul style="list-style-type: none"> <li>(a) urban design and place making (including active transport);</li> <li>(b) landscape architecture; and</li> <li>(c) architecture.</li> </ul> <p>The DRP may seek advice from suitably qualified, experienced independent professionals in other fields as required. The DRP must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.</p>	Section 5.1.4	TfNSW are responsible for engaging the DRP.
E64	<p>DRP members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.</p>	Section 5.1.4	TfNSW are responsible for engaging the DRP.
E65	<p>Prior to forming the DRP, a Design Review Panel Terms of Reference is to be developed in consultation with the NSW Government Architect. The Terms of Reference must:</p> <ul style="list-style-type: none"> <li>(a) be generally consistent with the published version of NSW State Design Review Panel Terms of Reference (version 6);</li> <li>(b) outline the frequency of DRP meetings, coordinated with the Proponent's program requirements, as outlined in Condition E70, to ensure timely advice and design adjustment;</li> <li>(c) outline the role and responsibilities of the Proponent's technical advisor; and</li> <li>(d) identify cessation arrangements.</li> </ul> <p>The Terms of Reference must be endorsed by the NSW Government Architect and submitted to the Planning Secretary upon request.</p> <p><i>Note: The Terms of Reference for the existing DRP can be updated to satisfy the requirements of this condition.</i></p>	Section 5.1.4	TfNSW are responsible for engaging the DRP and developing and seeking endorsement of the DRP Terms of Reference.





NSW CoA	Condition	Plan reference	How addressed
E66	The DRP must be operated and managed in accordance with the Design Review Panel Terms of Reference.	Section 5.1.4	TfNSW are responsible for engaging the DRP, developing and seeking endorsement of the DRP Terms of Reference, and operating and managing the DRP in accordance with the endorsed DRP Terms of Reference.
E67	<p>The Proponent must consult with the NSW Government Architect and appoint an appropriately qualified and experienced technical advisor to the DRP and may also appoint an alternate technical advisor. The advisor must attend meetings of the DRP. The advisor may also be invited by the DRP to assist with decisions regarding the DRP's recommendations and record the DRP's advice and recommendations.</p> <p><i>Note: The technical advisor is a representative of the Proponent that can explain design decisions to the DRP based on constructability and operability of design elements.</i></p>	Section 5.1.4	TfNSW are responsible for appointing appropriately qualified and experienced technical advisor(s) to the DRP.
E68	<p>The relevant Council and SOPA may be invited to the meetings of the DRP as observers or to provide feedback on key design elements of the CSSI.</p> <p><i>Note: This process is to be resolved through the terms of reference.</i></p>	Section 5.1.4	TfNSW are responsible for operating and managing the DRP in accordance with the endorsed DRP Terms of Reference.
E69	DRP advice and recommendations, and the Proponent's response to each recommendation must be included when submitting the final PDLP as outlined in Condition E71.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final Place, Design and Landscape Plan (PDLP) and the relevant Environment and Sustainability Design Review Reports.
E70	A design development schedule must be provided to the DRP before its first meeting following approval of CSSI, including details of when relevant elements of the detailed design will be available for review by the DRP. The schedule must be updated every three (3) months until the detailed design process is complete.	Section 5.1.4	TfNSW are responsible for NSW CoA E70. John Holland will provide all documents, information, assistance and co-operation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this condition.
E71	A Place, Design and Landscape Plan (PDLP) must be prepared consider place making, design and landscape outcomes from Condition E56 to document and illustrate the permanent built works and landscape design of the CSSI and how these works will be implemented during Construction and	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLP and the relevant Environment and Sustainability Design Review Reports.





NSW CoA	Condition	Plan reference	How addressed
	<p>maintained during Operation of the CSSI until transferred in accordance with Condition E81. The PDLP must be:</p> <p>(a) prepared by a suitably qualified and experienced person(s) in place, urban and landscape design and bush regeneration, as relevant;</p> <p>(b) reviewed by an independent suitably qualified and experienced person in consultation with the DRP, including any relevant detailed plans and schedules;</p> <p>(c) submitted to the Planning Secretary for approval prior to the Proponent's finalisation of the Preliminary Design Review plans and before proceeding to commencement of Detailed Design Review drawings; and</p> <p>(d) supported by a Design Review Report that outlines how DRP advice has been addressed, including an advice action log to track and close-out DRP advice as it is addressed.</p> <p>Note: The PDLP may be developed and considered in stages to facilitate design progression and Construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</p>		
E72	<p>The PDLP must document how the following matters have been considered in the design and landscaping of the project:</p> <p>(a) the Heritage Interpretation Strategy required by Condition E16;</p> <p>(b) the requirements of Conditions E56 to E57;</p> <p>(c) the requirements of Conditions E77 to E80;</p> <p>(d) the Pedestrian and Cycling Infrastructure Strategy required by Condition E122;</p> <p>(e) the outcomes of Condition E91;</p> <p>(f) how CPTED principles have changed or been implemented throughout the design process;</p> <p>(g) adverse impacts to privacy, safety and maintenance through cut and fill placement in consultation with relevant council(s);</p> <p>(h) the Rosehill-Camellia Place Strategy and the Sydney Olympic Park Master Plan published at the time of approval of this instrument; and</p>	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLP and the relevant Environment and Sustainability Design Review Reports.







NSW CoA	Condition	Plan reference	How addressed
	<p>(i) advice and recommendations from the DRP. In relation to any matter that is not consistent with the DRP's advice, advice on how the design provides an equivalent or superior quality place, design or landscaping outcome.</p> <p><i>Note: Condition E72(g) seeks to ensure that changes in existing landforms are minimised avoiding steep embankments and/or high retaining walls which dominate the public domain and are difficult to maintain by the end landowner.</i></p>		
E73	<p>The PDLP must include descriptions and visualisations, provide updates since reference design and identify the degree of change (as appropriate) of:</p> <ul style="list-style-type: none"> <li>(a) the design of the permanent built elements of the CSSI including their form, materials and detail;</li> <li>(b) the design of the project landform and landscaping elements;</li> <li>(c) the type and design of public and open space;</li> <li>(d) active transport connections;</li> <li>(e) ecological sensitive design, aesthetics, wayfinding and driver facilities;</li> <li>(f) provision for public art and heritage interpretation installations (including Connecting with Country interpretation and art;</li> <li>(g) details of strategies to rehabilitate, regenerate or revegetate disturbed areas of native vegetation with local native provenance species unless species are part of heritage or riparian landscapes;</li> <li>(h) water sensitive urban design initiatives; and</li> <li>(i) management and routine maintenance standards and regimes for design elements and landscaping work (including adequate watering of plants following planting depending on forecast weather conditions and weed management) to ensure the success of the design and landscape outcomes in consultation with the relevant Council(s).</li> </ul> <p>Unless otherwise agreed with the Planning Secretary, construction of permanent built work or landscaping, excluding underground utilities work and make good activities, that are the subject of the PDLP must not be commenced (in the area to which the PDLP applies) until the PDLP has been received by the Planning Secretary.</p>	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLP and the relevant Environment and Sustainability Design Review Reports.
E75	<p>An arborist, independent of design and construction personnel, with a minimum Australian Qualifications Framework (AQF) Level 5 qualification in Arboriculture must be appointed for the duration of Work, as the principle point of contact relating to impacts on trees.</p>	Section 5.1.3	TfNSW are responsible for engaging all Independent Appointments, including the Independent Arborist.





NSW CoA	Condition	Plan reference	How addressed
E81	<p>The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the PDLP, required by Condition E73.</p> <p>The Planning Secretary must be advised of the date of transfer of the asset(s) to the relevant authority.</p>	FFMP	<p>John Holland will maintain the infrastructure constructed as part of the PLR2 – EW, including urban design, open space, landscaping and recreational items in accordance with the Project Deed until the completion of the defect's liability period as certified by the Independent Certifier. The Planning Secretary will be notified of the date of transfer of the asset(s) to the relevant authority, where this is not TfNSW, noting that the defects liability period and associated landscape maintenance will generally continue after transfer.</p>
E83	<p>The Proponent must identify the utilities and services (hereafter "services") potentially affected by construction to determine requirements for diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from the CSSI is avoided where practical and advised to customers.</p>	Section 2.7	<p>Utilities and services potentially affected by PLR2 – EW will be identified to determine requirements for diversion, protection and/or support. Alterations to utilities and services will be determined through negotiation between John Holland or TfNSW and the service providers. In consultation with service providers, John Holland will ensure that disruption to utilities and services resulting from the PLR2 – EW are avoided where possible and where unavoidable, customers will be advised in advance using the mechanisms described in the CCS and CEP. Details of the proposed utilities and services works is provided in the Utilities Management Strategy developed to satisfy NSW CoA E130.</p>
E84	<p>Access to all utilities, open space and properties must be maintained during Construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.</p>	Section 2.7	<p>Access to all utilities, open space and properties will be maintained during construction, where practicable, unless otherwise agreed with the relevant utility owner, landowner or occupier.</p>
E87	<p>The Proponent must offer pre-condition surveys, to the owners of surface and sub-surface structures, and other relevant assets identified at risk from vibration, including all listed heritage items and buildings/structures of heritage significance as identified in the documents listed in Condition A1. Where the offer is accepted, the survey must be undertaken by a suitably qualified and experienced</p>	NVMP	<p>This requirement is addressed as part of the NVMP (Appendix B3).</p>





NSW CoA	Condition	Plan reference	How addressed
	engineer and/or building surveyor prior to the commencement of vibration generating works that could impact on the structure/asset. The results of each survey must be documented in a Pre-construction Condition Survey Report and copies of the report must be provided to the owner of the item(s) surveyed no later than one (1) month before the commencement the impacting work / activity.		
E88	Where Pre-condition surveys have been undertaken in accordance with Condition E87, subsequent post-construction surveys of the structure / asset must be undertaken by a suitably qualified and experienced engineer and/or building surveyor to assess damage that may have resulted from the vibration-generating works. The results of the post-construction surveys must be documented in a Post-construction Condition Survey Report for each item surveyed. Copies of Post-construction Condition Survey Reports must be provided to the owner of the structure / asset surveyed no later than four (4) months following the Completion of Construction activities that have the potential to impact on the structure / asset.	NVMP	This requirement is addressed as part of the NVMP (Appendix B3).
E89	Where damage has been determined to occur as a result of the CSSI, the Proponent must carry out rectification at its expense and to the reasonable requirements of the owner of the structure/asset within 12 months of the completion of Construction activities that have the potential to create damage unless another timeframe is agreed with the owner. Alternatively, the Proponent may pay compensation for the damage as agreed with the owner.	NVMP	This requirement is addressed as part of the NVMP (Appendix B3).
E114	Before any local road is used by a heavy vehicle for the purposes 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 council(s) within three (3) weeks of completion of the survey and no later than one (1) month prior to the road being used by heavy vehicles associated with the CSSI.  <i>Note: This Condition would only apply for the local roads surrounding the CSSI and would not apply after the nearest connecting State Road, e.g., does not apply to materials or equipment transported from suppliers.</i>	CTTAMP	This requirement is addressed as part of the CTTAMP (Appendix B1).
E115	If damage to roads occurs as a result of the CSSI, the Proponent must either (at the relevant road authority's discretion):  (a) compensate the relevant road authority for the damage so caused; or  (b) rectify the damage to restore the road to at least the condition it was in pre-works as identified in the Road Dilapidation Report(s).	CTTAMP	This requirement is addressed as part of the CTTAMP (Appendix B1).
E130	A Utilities Management Strategy must be prepared in consultation with relevant Council(s), SOPA (in Sydney Olympic Park) and relevant utility providers and implemented for all utility work undertaken as a	Section 2.7	A Utilities Management Strategy will be prepared in accordance with NSW CoA 130 and in





NSW CoA	Condition	Plan reference	How addressed
	<p>result of the CSSI. The Strategy must identify how utility Work will be defined and managed. The Utilities Management Strategy must include:</p> <p>(a) a description of all utility Work to be undertaken; and</p> <p>(b) management measures to be implemented to manage dust, noise, traffic, access, lighting and other relevant impacts associated with utility Work.</p> <p>The Utilities Management Strategy must be submitted to the Planning Secretary for approval at least one (1) month before the commencement of utility Work.</p>		consultation with relevant Council(s), SOPA (in Sydney Olympic Park) and relevant utility providers and implemented for all utility work undertaken as a result of the PLR2 – EW.
E131	Nothing in this approval permits the carrying out of any utility work not required for the purpose of the CSSI.	Section 2.7	The requirements of this condition are noted. John Holland will implement PLR2 – EW in accordance with the Infrastructure Approval.
E136	In the event that the alignment moves closer to private properties in the vicinity of hazardous infrastructure it must demonstrate through a technical note/letter that the outcomes in regards to the final design of the CSSI, including but not limited to the positioning of its final route and stops does not change the risk identified in documents listed in Condition A1 must be submitted to the Planning Secretary for approval.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
E137	<p>If the Planning Secretary issues a written direction that a Final Hazard Analysis (FHA) is required (following consultation with the Planning Secretary in Condition E136), it must be prepared and submitted for the approval of the Planning Secretary at least one (1) month prior to commencement of Construction in the vicinity of hazardous infrastructure (gas pipelines), or other timeframe as agreed with the Planning Secretary. Construction in the vicinity of hazardous infrastructure must not recommence until approval of the FHA has been given by the Planning Secretary. The FHA must:</p> <p>(a) report on the outcomes of consultations undertaken with relevant pipeline operators, including provision of a copy of the Safety Management Studies required under Australian Standard 2885 Pipelines – Gas and liquid petroleum; and</p> <p>(b) provide an implementation plan for all recommendations and actions arising from the consultations in (a) above.</p>	Section 3.3.6	<p>John Holland will comply with any written directions from the Planning Secretary in relation to this condition.</p> <p>This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.</p>





Table 27 – Secondary Updated Mitigation Measures

UMM	Measure	Plan reference	How addressed
LP1	The design will continue to be refined to minimise land requirements and potential impacts on land uses and properties as far as reasonably practicable. Consultation with landowners/landholders will be ongoing to confirm feasible and reasonable measures to minimise impacts on their operations/properties.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
LP2	Consultation with key stakeholders (including City of Parramatta Council, Sydney Olympic Park Authority, the Department of Planning and Environment, Royal Agricultural Society of NSW, and relevant developers) will be ongoing to ensure that the design of the project is integrated as far as practicable with adjoining developments, proposed developments and urban renewal areas (including those subject to the <i>Camellia-Rosehill Place Strategy</i> (DPE, 2022), structure planning for Melrose Park North and Melrose Park South, the <i>Parklands Plan of Management 2010</i> (Sydney Olympic Park Authority, 2010), the <i>Sydney Olympic Park Master Plan 2030</i> (Sydney Olympic Park Authority, 2018) (including the <i>Sydney Olympic Park Master Plan 2030 Interim Metro Review</i> (Sydney Olympic Park Authority, 2022)), the <i>Sydney Olympic Park Vision and Strategy 2050</i> (Sydney Olympic Park Authority, 2022), and the <i>Carter Street Precinct Development Framework</i> (DPIE, 2020)). This will include identifying measures and design responses to manage the interface between the project and adjoining land uses and properties as far as reasonably practicable.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
LP4	A residual land management plan will be prepared to define the proposed approach to managing residual land, including consulting on proposed future uses with key stakeholders, and required actions in relation to the identified land.	Section 3.3.6	TfNSW will comply with UMM LP4. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this UMM. This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
LP5	Construction planning will minimise the duration that land is required to the shortest possible duration, particularly where the land requirements affect recreation/open space areas.	Section 2.4.3	Construction planning will minimise the duration that land is required to the shortest possible duration, particularly where the land requirements affect recreation/open space areas.
LP6	All property acquisitions will be undertaken in accordance with the requirements of the <i>Land Acquisition (Just Terms Compensation) Act 1991</i> , the land acquisition reforms announced by the NSW	Section 2.8	TfNSW are responsible for complying with UMM LP6.







UMM	Measure	Plan reference	How addressed
	Government in 2016, and the recommendations of the Auditor General's 2021 review of Transport for NSW's acquisition practices.		
LP7	<p>Transport for NSW will appoint Personal Relationship Manager(s) to assist residential landowners and tenants who may be affected by acquisition. The Personal Relationship Manager(s) will maintain regular contact with these individuals to provide assistance with the acquisition process, including updates on the project, and respond to queries.</p> <p>The Personal Relationship Manager(s) will work with the landowners and tenants to offer assistance and support throughout the acquisition process.</p>	Section 2.8	TfNSW are responsible for complying with UMM LP7.
LP8	<p>Transport for NSW will seek to secure agreements with affected landowners/landholders, to guide property-level design requirements and the management of construction on, or immediately adjacent to, private properties.</p> <p>Property adjustment plans will be prepared in consultation with impacted landowners/landholders. The plans will define the works required to properties affected by acquisition and those requiring adjustments as a result of the project. Works will include, but not be limited to, adjustments to driveways, fences, trees and landscaping.</p>	Section 2.8	<p>John Holland will prepare property adjustment plans in consultation with impacted landowners / landholders in accordance with UMM LP8.</p> <p>Property adjustment plans will define the works required to properties affected by acquisition and those requiring adjustments as a result of the PLR2 – EW.</p>
LP9	The location of all utilities and services, and requirements for access to, diversion, protection and/or support, will be confirmed prior to construction. This will include (as required) undertaking utilities investigations, including intrusive investigations, and consultation and agreement with service providers.	Section 2.7	Utilities and services potentially affected by PLR2 – EW will be identified to determine requirements for diversion, protection and/or support, including conducting utilities investigations as required, and in consultation/agreement with service providers.
LP10	<p>A rehabilitation strategy will be prepared to guide rehabilitation planning, implementation, monitoring and maintenance of disturbed areas outside the operational footprint following the completion of construction. The strategy will have regard to Appendix G (Rehabilitation recommendations) of <i>Managing Urban Stormwater–Soils and Construction – Volume 1</i> (Landcom, 2004).</p> <p>The strategy will be consistent with the residual land management plan for land owned by Transport for NSW.</p>	FFMP	This requirement is addressed as part of the FFMP (Appendix B5).
LP11	<p>Land subject to temporary use will be rehabilitated as soon as practicable to the pre-construction condition (or as agreed with the landowner/landholder), taking into consideration the existing condition, location and land use characteristics.</p> <p>Rehabilitation will be undertaken in consultation with the relevant landowner/landholder, and in accordance with the rehabilitation strategy.</p>	FFMP	This requirement is addressed as part of the FFMP (Appendix B5).





UMM	Measure	Plan reference	How addressed
SE1	<p>Transport for NSW will implement the Parramatta Light Rail Stage 2 Community Communication Strategy to guide the management and delivery of community and stakeholder engagement in the lead up to and during construction, and ensure that:</p> <ul style="list-style-type: none"> <li>accurate and accessible information about the project is provided</li> <li>feedback from the community is encouraged</li> <li>opportunities for input to design development are provided, where relevant</li> <li>community members and stakeholders with the potential to be affected by construction activities are notified in a timely manner about the timing of activities and potential for impacts</li> <li>enquiries and complaints are managed (see mitigation measure SE3), and a timely response is provided for concerns raised.</li> </ul>	<p>Section 5.5.3.1 Section 5.5.3.2</p>	<p>TfNSW are responsible for developing and seeking approval of the CCS. John Holland will implement the CCS through the implementation of the CEP.</p>
SE2	<p>Dedicated place managers will be available in the lead up to, and during, construction to listen to concerns and answer questions from the community and businesses. Place managers will provide a single point of contact for people (including business owners/operators) wanting to find out more about the project, including the impacts of construction, and the measures that will be implemented to minimise these impacts as far as possible.</p>	<p>Section 5.5.3.3</p>	<p>The John Holland communications team, led by the Stakeholder and Communications Manager, will be available in the lead up to, and during, construction to listen to concerns and answer questions from the community and businesses.</p>
SE3	<p>Enquiries and complaints management systems will be developed, outlined in the Community Communication Strategy, and implemented before and during construction.</p> <p>The complaints management systems will be maintained throughout the construction period and for a minimum of 12 months after construction finishes.</p>	<p>Section 5.5.4</p>	<p>The requirements of NSW CoA B5 and UMM SE3 will be satisfied by TfNSW prior to commencement of work on PLR2 – EW and maintained for 12 months following completion of construction. Refer to the CCS and CEP for further details on communication processes.</p>
SE4	<p>A social impact management plan (SIMP) will be prepared, in accordance with Section 5.2 of the <i>Social Impact Assessment Guideline for State Significant Projects</i> (DPIE, 2021), to manage the implementation of the proposed socio-economic mitigation measures, and detail the specific management actions and targets that will be developed in response to these measures. The SIMP will define specific actions, roles and responsibilities, and a monitoring, reporting and adaptive management framework for construction.</p>	<p>Section 5.5.4</p>	<p>As part of the CEP, a SIMP will be prepared, in accordance with Section 5.2 of the <i>Social Impact Assessment Guideline for State Significant Projects</i> (DPIE, 2021).</p>
SE6	<p>Transport for NSW will continue to consult with relevant key stakeholders (including facility managers) in relation to community infrastructure with the potential to be directly affected (by the project's land requirements) and/or indirectly affected (for example, as a result of amenity impacts or access changes).</p>	<p>Section 5.5.3.3</p>	<p>TfNSW and John Holland will continue to consult with stakeholders on the impacts from construction of the PLR2 – EW including, but not be limited to, relevant councils, NSW Maritime,</p>





UMM	Measure	Plan reference	How addressed
	<p>Consultation will be undertaken in accordance with the engagement plan (mitigation measure SE1) and will assist with identifying measures to minimise the potential impacts of the project on community infrastructure as far as possible.</p> <p>Stakeholders to be consulted will include, but not be limited to, City of Parramatta Council, City of Ryde Council, NSW Maritime, Melrose Park Public School and the Department of Education, and Sydney Olympic Park Authority.</p>		Melrose Park Public School and the Department of Education, and SOPA.
SE7	Transport for NSW will continue to consult with relevant councils and Sydney Olympic Park Authority to offset the direct impacts of the project's land requirements on open space (parks and reserves) through the provision of a net increase in open space, including active transport infrastructure and improved open spaces and recreation facilities.	Section 5.5.3.3	TfNSW and John Holland will continue to consult with relevant councils and SOPA on the impacts from construction of PLR2 – EW.
SE8	<p>A project-specific social procurement and workforce development strategy will be developed and implemented to</p> <ul style="list-style-type: none"> <li>nominate workforce development and social procurement targets and outcomes</li> <li>define approaches to achieve nominated targets and outcomes</li> <li>support job creation and skill development opportunities for the project.</li> </ul>	Social Procurement and Workforce Development Management Plan	A project-specific social procurement and workforce development strategy will be developed as part of the Social Procurement and Workforce Development Management Plan.
SE9	<p>A business management and activation plan will be prepared and implemented for businesses with the potential to be affected by the project, including those located on roads impacted by construction.</p> <p>The plan will identify businesses with the potential to be impacted by the project. It will detail feasible and reasonable measures, developed in consultation with affected business owners/operators to:</p> <ul style="list-style-type: none"> <li>minimise disruption for customers and deliveries as far as possible</li> <li>maintain vehicular and pedestrian access during business hours, including alternative arrangements for times when access cannot be maintained</li> <li>maintain visibility of the business to potential customers during construction, including alternative arrangements for times when visibility cannot be maintained</li> <li>respond to other identified impacts as far as possible, including specific measures to assist small businesses with the potential to be adversely affected during construction.</li> </ul> <p>The plan will also include:</p> <ul style="list-style-type: none"> <li>measures identified as an outcome of the small business support program (measure SE11)</li> <li>maintaining a phone hotline that enables businesses to find out about the project or register any issues</li> </ul>	Business Management and Activation Plan	TfNSW are responsible for developing and implementing a Business Management and Activation Plan. John Holland will provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this UMM.





UMM	Measure	Plan reference	How addressed
	<ul style="list-style-type: none"> <li>establishment of business reference groups to provide information on the project and assist with the development of management measures</li> <li>a feedback and monitoring mechanism to assess the effectiveness of measures.</li> </ul>		
SE11	<p>A small business support program will be established to provide assistance to small business owners with the potential to be impacted by construction. The program will assist local businesses develop proactive business strategies, including:</p> <ul style="list-style-type: none"> <li>marketing and promotion</li> <li>business diversification and business planning</li> <li>engagement of specialists to provide training.</li> </ul>	Business Management and Activation Plan CCS	TfNSW are responsible for establishing a small business support program to provide assistance to small business owners with the potential to be impacted by construction of the PLR2 – EW.
SE12	<p>An Aboriginal community and stakeholder engagement strategy and action plan will be prepared to define the strategies that will be implemented to minimise impacts on cultural values and ensure that:</p> <ul style="list-style-type: none"> <li>information about the project is shared with Aboriginal stakeholders and communities in a timely manner</li> <li>local Aboriginal cultural and community values are identified and understood</li> <li>opportunities to reflect Aboriginal community and cultural values are identified and implemented.</li> </ul>	Aboriginal community and stakeholder engagement strategy and action plan	TfNSW are responsible for developing the Aboriginal community and stakeholder engagement strategy and action plan. John Holland will implement the Aboriginal community and stakeholder engagement strategy and action plan and provide all documents, information, assistance and cooperation reasonably requested by TfNSW (and within the time requested by TfNSW) in connection with a request under this UMM.
LV1	<p>The urban design requirements will be finalised in accordance with the vision, principles and outcomes defined in Technical Paper 1 (Design, Place and Movement) and the Supplementary Design, Place and Movement Report, to provide detailed urban design guidelines and key requirements for the project, including individual design elements.</p> <p>The urban design requirements will be finalised in consultation with key stakeholders, the operator, the rail regulator, and the Design Review Panel.</p>	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLP and the relevant Environment and Sustainability Design Review Reports.
LV2	Design development will be undertaken in accordance with the urban design requirements and with advice from the Design Review Panel.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLP and the relevant Environment and Sustainability Design Review Reports.
LV7	Lighting will be designed and sited to minimise glare and light spill into adjoining areas in accordance with Australian/New Zealand Standard AS/NZS 4282:2019 <i>Control of the obtrusive effects of outdoor lighting</i> and relevant standards in the series AS/NZS 1158:2005 <i>Lighting for roads and public spaces</i> .	Section 2.5	Lighting will be designed and sited to minimise glare and light spill into adjoining areas in accordance with NSW CoA E58 and UMM LV7.





UMM	Measure	Plan reference	How addressed
LV8	Opportunities to mitigate the high-moderate and high visual impacts to residential properties on Wharf Road south of Andrew Street (such as planting to provide screening of views to the bridge) would be investigated in consultation with property owners.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLF and the relevant Environment and Sustainability Design Review Reports.
LV11	Construction site hoarding and fencing will be designed, erected and maintained to minimise visual impacts. This will include: <ul style="list-style-type: none"> <li>erecting hoarding/fencing as early as possible in the site establishment phase to provide visual screening</li> <li>using high quality materials suitable for parks and public spaces where sites are located close to sensitive receivers and public open space</li> <li>featuring graphics, artwork or project information at appropriate locations in consultation with Transport for NSW</li> <li>maintaining hoarding/fencing regularly, including the prompt removal of graffiti.</li> </ul>	Section 2.4.4	Boundary screening will minimise, as far as practicable, visual impacts on adjacent sensitive receivers and be implemented in accordance with the requirements of UMM LV11.
LV12	Lighting of work areas, compounds, and work sites will be oriented to minimise glare and light spill impact on adjacent receivers.	Section 2.5	Lighting of work areas, compounds, and work sites will be oriented to minimise glare and light spill impact on adjacent receivers.
LV13	Following completion of construction, site restoration will be undertaken in accordance with the rehabilitation strategy (mitigation measure LP10). Temporary impacts on public open space will be rehabilitated in consultation with the relevant local council or Sydney Olympic Park Authority.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design as part of the final PDLF and the relevant Environment and Sustainability Design Review Reports.
BD7	Opportunities to minimise light and noise pollution to ecologically sensitive areas, particularly the Parramatta River, Newington Nature Reserve and the Millennium Parklands will be investigated and implemented, with regard to the <i>National Light Pollution Guidelines for Wildlife</i> (Department of the Environment and Energy, 2020), and in consultation with Sydney Olympic Park Authority.	Section 2.5 FFMP	Opportunities to minimise light and noise pollution to ecologically sensitive areas will be investigated and implemented and in consultation with SOPA. This requirement is addressed as part of the FFMP (Appendix B5).
HR1	The project will be designed in accordance with <i>Non-Ionising Radiation Protection Guidelines for Limiting Exposure to Time Varying Electric and Magnetic Fields</i> (ICNIRP, 2010) and Australian Standard AS 2067:2016 <i>Substations and high voltage installations exceeding 1 kV</i> to minimise the risk associated with electro-magnetic field exposure. Wiring, tracks and other infrastructure will be designed to mitigate risks associated with high voltage cabling and potential earth leakage.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.







UMM	Measure	Plan reference	How addressed
HR2	Ongoing design development will be subject to detailed safety reviews through the Safety in Design process, to identify measures to mitigate, manage and reduce the risk of incidents arising from collisions during operation.	Section 3.3.6	This condition is a technical requirement that will be addressed in the detailed design and the relevant Environment and Sustainability Design Review Reports.
HR7	A safety management study will be undertaken to identify potential risks, including those associated with proposed alterations, to the gas and fuel pipelines in accordance with Australian and New Zealand Standard AS/NZS 2885.6:2018 <i>Pipelines—Gas and liquid petroleum</i> , Part 6: Pipeline safety management. The outcomes of the safety management study will be incorporated in construction planning and design development.	Section 2.7	To identify potential risks, including those associated with proposed alterations to the gas and fuel pipelines, a Safety Management Study will be undertaken in accordance with AS/NZS 2885.6:2018, and the outcomes incorporated in construction planning and design development.
HR8	The transport of dangerous goods will be undertaken in accordance with the <i>Dangerous Goods (Road and Rail Transport) Regulation 2009</i> and the <i>Australian Code for the Transport of Dangerous Goods by Road and Rail</i> (National Transport Commission, 2017).	CTTAMP	This requirement is addressed as part of the CTTAMP (Appendix B1).





## Appendix A2: Environment Policy

**JOHN  
HOLLAND**

### ENVIRONMENT POLICY

UP FOR THE CHALLENGE OF TRANSFORMING LIVES

#### OUR COMMITMENT

To value the natural environment and communities in which we work.

Our goal across all business activities is to use resources efficiently, minimise environmental impacts and prevent pollution, and enhance and protect the environment and our heritage.

#### OUR APPROACH

John Holland's four values are the platform for our everyday interactions and guide our approach to the environment.

#### Caring



We care deeply about what we do and how it impacts the environment now and for the future by:

- Driving a strong culture of respect for the environment across our business, and with our industry partners
- Prioritising the environment and resource efficiency in our decision-making throughout the project lifecycle - planning, design, procurement and delivery
- Providing best practice training and education to our people to build awareness and capability to protect the environment and respect the communities in which we work and live.

#### Empowering



We gain trust through action by:

- Empowering our people, partners and subcontractors to speak up about how we can better protect and enhance the environment
- Encouraging participation and collaboration with all our people and stakeholders to achieve positive environmental performance and outcomes
- Driving accountability by ensuring everyone is responsible for valuing and protecting the environment

#### Imaginative



We push the boundaries by:

- Focusing on continual learning and improvement - reviewing performance, capturing and sharing lessons learnt, and celebrating successes
- Exploring and introducing new technologies and approaches that minimise impacts on the environment and provide positive outcomes for the community
- Having a transparent risk management process that helps us continuously identify opportunities to improve working with our clients and other stakeholders to help them exceed their objectives and obligations

#### Future-focused



We're in it for the long, long term by:

- Exceeding our legislative, customer and other mandatory requirements
- Maintaining and improving an effective management system
- Ensuring our work leaves a positive legacy for the communities we serve and the environment we operate in

**Glenn Palin**  
Chief Executive  
Officer

November 2024



## Appendix A3: Minor Ancillary Facilities checklist template



Parramatta Light Rail 2A – Enabling Works		MINOR ANCILLARY FACILITIES CHECKLIST	
Title:	XXXXXXXXXXXXXXXXXX	Doc No.:	PLR2A-MAF-XXX
Date:	XX/XX/XXXX	Revision:	X
<b>MAF Criteria: C7</b>	<p>Has the proposed MAF been assessed in the documents listed in NSW CoA A1 (Environmental Assessment Documentation)? (check box with an “X”):</p> <p>Yes <input type="checkbox"/> MAF can be established. No further approval required.</p> <p>No <input type="checkbox"/> Proceed to ‘(A) Location Information’.</p>		
<b>(A)</b>	<b>Location Information</b>		
<b>Site name</b>			
<b>Site location</b>			
<b>Address</b>			
<b>Location map</b>			
<b>MAF Criteria: C7(a)</b>	<p>Is the proposed MAF is located within or immediately adjacent to the construction boundary? (check box with an “X”):</p> <p>Yes <input type="checkbox"/> Proceed to ‘(B) Assessment Criteria’.</p> <p>No <input type="checkbox"/> Consider the consistency of the MAF.</p>		





Parramatta Light Rail 2A – Enabling Works		MINOR ANCILLARY FACILITIES CHECKLIST	
Title: XXXXXXXXXXXXXXXXXXXX		Doc No.: PLR2A-MAF-XXX	
Date: XX/XX/XXXX		Revision: X	
(B)	<b>Assessment criteria</b>		
MAF Criteria C7(b)(i)	Provide details confirming that the proposed MAF will have minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts:		
MAF Criteria C7(b)(ii)	Provide details confirming that the proposed MAF will have minimal environmental impact with respect to waste management and flooding:		
MAF Criteria C7(b)(iii)	Provide details confirming that the proposed MAF will have no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of the Infrastructure Approval:		
MAF Criteria: C7(b)	<p>Does the proposed MAF satisfy the criteria set out in NSW CoA C7(b)? (check box with an “X”):</p> <p>Yes <input type="checkbox"/> Proceed to ‘(C) Safeguards’.</p> <p>No <input type="checkbox"/> Consider the consistency of the MAF.</p>		







Parramatta Light Rail 2A – Enabling Works		MINOR ANCILLARY FACILITIES CHECKLIST	
Title: XXXXXXXXXXXXXXXXX		Doc No.: PLR2A-MAF-XXX	
Date: XX/XX/XXXX		Revision: X	
(C)	<b>Safeguards</b>		
Additional mitigation measures (as required)	Provide details of additional site-specific mitigation measures to be implemented for the proposed MAF:		
	<b>Safeguard</b>	<b>Responsibility</b>	<b>Timing</b>
Environmental Control Map	<p>Is the proposed MAF appropriately covered by an existing endorsed ECM? (check box with an "X"):</p> <p>Yes <input type="checkbox"/> Provide ECM reference: <input type="text"/></p> <p>No <input type="checkbox"/> Prepare or update ECM for ER endorsement.</p>		
Noise impacts: A35(h)(iv)	<p>Has the AA reviewed the noise impacts of the proposed MAF and provided comments to the ER? (check box with an "X"):</p> <p>Yes <input type="checkbox"/> Proceed to '(D) Certification'.</p> <p>No <input type="checkbox"/> Provide relevant information to the AA for review.</p>		
(D)	<b>Certification</b>		
John Holland	<p>This Minor Ancillary Facility Checklist (PLR2A-MAF-XXX) provides a true and fair review of the proposed activity for PLR2 – EW project:</p> <p>Signed:</p> <p>Name:</p> <p>Position:</p> <p>Date:</p>		



Parramatta Light Rail 2A – Enabling Works		MINOR ANCILLARY FACILITIES CHECKLIST	
Title:	XXXXXXXXXXXXXXXXXXXX	Doc No.:	PLR2A-MAF-XXX
Date:	XX/XX/XXXX	Revision:	X
Environmental Representative	I have assessed the proposed MAF in accordance with NSW CoA C7(b) and endorse the establishment and use:		
	Signed:		
	Name:		
	Position:		
	Date:		





## Appendix A4: Environmental Control Map template



Parramatta Light Rail 2A – Enabling Works		ENVIRONMENTAL CONTROL MAP (ECM)					
Title:	XXXXXXXXXXXXXXXXXXXX	Doc No.:	PLR2A-ECM-XXX	Date:	XX/XX/XXXX	Revision:	X
Aspect	Supporting information and safeguards						
Scope & Activities	Insert details of the scope and activities covered by the ECM.						
General	Insert any general safeguards.						
Working Hours	Insert approved working hours for works covered by the ECM.						
Environmental Incidents	Insert incident response requirements.						
Worker behaviour onsite	Insert safeguards covering worker behaviour.						
Heritage	Insert safeguards covering heritage.						
Contamination and asbestos	Insert safeguards covering contamination and asbestos.						
Flora & Fauna	Insert safeguards covering flora & fauna.						
Soil and water	Insert safeguards covering soil and water.						
Chemical and fuel storage	Insert safeguards covering chemical and fuel storage.						
Noise and vibration	Insert safeguards covering noise and vibration.						
Visual Amenity	Insert safeguards covering visual amenity.						
Traffic and access	Insert safeguards covering traffic and access.						
Waste and recycling	Insert safeguards covering worker waste and recycling.						
Air quality and dust	Insert safeguards covering air quality and dust.						
Community interaction	Insert safeguards covering community interaction.						





## Key contact information

Role	Name	Phone number
John Holland Superintendent	<i>insert</i>	<i>insert</i>
John Holland Project Manager	<i>insert</i>	<i>insert</i>
John Holland Environment and Sustainability Manger	<i>insert</i>	<i>insert</i>
John Holland Stakeholder and Communications Manager	<i>insert</i>	<i>insert</i>
John Holland Safety Manager	<i>insert</i>	<i>insert</i>
TfNSW Environment and Planning Manager	<i>insert</i>	<i>insert</i>
TfNSW Project Manager	<i>insert</i>	<i>insert</i>
TfNSW Communications Manager	<i>insert</i>	<i>insert</i>
PLR Community Information Line	-	1800 139 389
Fire and rescue	-	000
Workcover	-	13 10 50
WIRES	-	1300 094 737



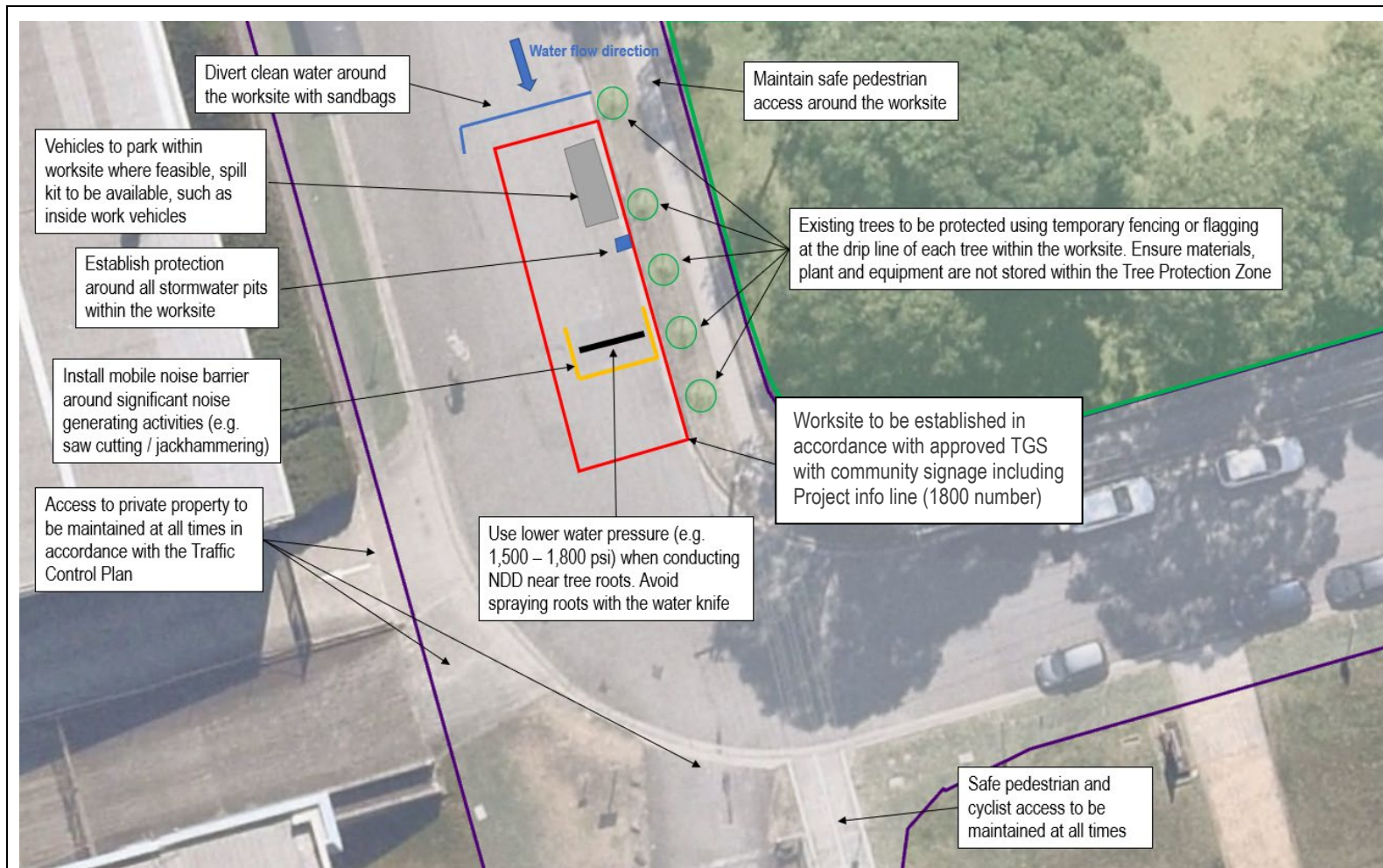




ECM sign-on page			<i>(By signing this page, I acknowledge that I have read and implemented the requirements of this ECM)</i>		
Name	Signature	Date	Name	Signature	Date



## Attachment 1: Environmental Control Maps



### GENERAL SITE SETUP

#### Construction Notes:

- Locations of controls are indicative and are to be adjusted to suit the site conditions.
- All safeguards identified in the ECM must be implemented prior to site establishment.
- Community notification to be issued prior to works commencing.
- Staff are to be inducted and trained on the requirements of the ECM. Training is to include instruction on community interaction, worker behaviour and complaints process.
- ECM is to be on site at all times.
- Works must not commence until work crews have reviewed and signed the ECM.
- Works only during standard working hours Mon to Fri (7am to 6pm) and Saturday 8am to 1pm. No work on Sundays or public holidays.
- PLR Project information to be available on the site fencing incl. project info-line (1800 139 389).
- Waste to be segregated, classified in accordance with EPA Guidelines and disposed at an appropriately licenced facility.
- Reinstate ground disturbance locations at the end of each shift.
- Disturbed grass and vegetation to be reinstated to a condition comparable to pre-works.
- Pedestrian detours to be in place as per approved TGS.



## Appendix A5: Environmental Incident Procedure



# Environmental Incident Procedure

**Procedure Number:** EMF-EM-PR-0001 Environmental Incident Procedure

**Effective Date:** 19/07/2021

**Review Date:** 19/07/2023

## 1 Who is this document for?

All Ongoing / Temporary/ Seconded/Casual staff of TfNSW	YES
Transport Service Senior Managers and Executives	YES
Labour Hire, Consultants and Professional Service Contractors	YES
Delivery Partners / Contractors	YES

## 2 Purpose and Scope

### 2.1 Purpose

The purpose of this document (Procedure) is to set out the procedure to be followed if, during an activity being carried out by or on behalf of TfNSW, there is:

- a report-only event
- a non-compliance
- regulatory action received
- an environmental incident.

The Procedure sets out the steps for the:

- identification,
- classification and
- reporting

of report-only events, non-compliances, regulatory action and environmental incidents.

### 2.2 Scope

The Procedure sets out internal only reporting processes for environmental events and the additional process for 'notifiable events', which are environmental incidents that must be reported externally (see section 3.3).

The Procedure is applicable to all TfNSW activities where report-only events, non-compliances, regulatory action and environmental incidents may occur. The requirements of the Procedure must be communicated to all TfNSW employees and contractors (e.g. during inductions) who undertake those activities.

This includes (but is not limited to):

- Activities undertaken by contractors on behalf of TfNSW
- Temporary activities, such as preliminary investigations (e.g. geotechnical and environmental surveys)
- Construction and maintenance of TfNSW assets
- Activities at TfNSW properties and facilities (including TAHE)
- Maritime vessels operated by TfNSW.

The procedure does NOT cover report-only events, non-compliances, regulatory action and environmental incidents relating to:

- Operating agencies embedded within TfNSW, such as Sydney Metro. At the time of release of the Procedure, there was a Corporate Functions Review underway, which sought to incorporate Sydney Trains and NSW TrainLink into TfNSW. The single operating model may involve the future amalgamation of environmental incident procedures. Regardless, it is noted that all agencies provide their incident data to Environment and Sustainability (E&S) Branch for the purposes of cluster reporting;
- Operational road and traffic activities of the general public (e.g. vehicle accidents, fires caused by discarded cigarette butts);
- Boating accidents (except those involving TfNSW Maritime vessels);
- Dumping of materials by members of the public on TfNSW managed land (except where hazardous materials are unexpectedly found during construction or maintenance activities);
- Marine oil and chemical spills covered by the National Plan for Maritime Environmental Emergencies (Australian Maritime Safety Authority, 2014).

The Procedure does not provide guidance on management responses or corrective actions required following environmental incidents and non-compliances, which are site specific and should be addressed by those with responsibility for the activity that caused the incident or non-compliance.

However, TfNSW E&S Branch is available to provide advice on appropriate responses and corrective actions in relation to individual incidents or non-compliances.

## 3 Requirements

### 3.1 Environmental incidents, report-only events, non-compliances and regulatory action

This Procedure is applicable to a range of environmental incidents, report-only events, non-compliances and regulatory action that may occur during activities undertaken by, or on behalf of, TfNSW. Each of these events and their reporting requirements are described in the following sections.

Personnel using this Procedure should consider the definitions of each of these events when reporting. Definitions are provided in Section 6.

Note that a set of circumstances may be both a non-compliance and an environmental incident. An environmental incident could also result in regulatory action.

#### 3.1.1 Environmental incidents

Environmental incidents are defined in section 6. Reporting requirements are detailed in section 3.2.

The person responsible for operational management of the site/activity that caused the incident should assume responsibility for reporting in accordance with this Procedure, together with coordinating the response to the incident, including directing actions as necessary.

The TfNSW Environment Manager will classify reported incidents for the purposes of internal environmental performance reporting and analysis of environmental incident trends (as outlined in Figure 3.2.1).

Environmental incident classifications are described in Table 3.1.1, below. The classification system is aligned to the consequence levels (C6 – C1) from the [TfNSW Enterprise Risk Management Standard](#) and considers the key risk areas of:

- Environment



- Reputation and Integrity
- Regulations and Compliance.

The appropriate consequence level for each of the three key risk areas will be recorded for each incident, but only the highest recorded consequence level will be used as the incident classification for reporting purposes.

Note that not all criteria described for each consequence level in Table 3.1.1 need to be met in order to assign an incident classification – the most appropriate criteria should be considered when determining the consequence level for each key risk area for each incident.

**Table 3.1.1: Environmental Incident Classification**

Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Environment	No appreciable changes to environment.	Change from existing conditions that can be rectified immediately (< 1 day) with available resources.	Short-term (< 1 year) and/or well-contained environmental impact.  Minor remedial actions probably required.	Short to medium term (between 1 and <5 years) environmental impact.  Considerable remedial actions probably required.	Medium-term (>5 years) environmental impact.  Extensive remedial actions probably required.	Long-term (>10 years) large-scale environmental impact.  Extensive and ongoing remedial actions probably required.
Reputation and integrity	Single negative article in local media.  Limited social media commentary.  Goodwill, confidence and trust retained.  Confined to the Branch.  Local council may want to discuss.	Series of negative articles in local media (District / electorate based adverse media).  Some social media commentary.  Confidence remains - minor loss of goodwill.  Confined to Branch but requiring notification to Division. Council requires written explanation. Recoverable with little effort or cost.  Some continuing scrutiny/attention.	Extended local media coverage with some broader Regional media coverage.  Extended negative social media coverage.  Confidence and trust of stakeholders dented (recoverable at modest cost within existing budget and resources).  Division formal response needed to State Government/Regulator.	State media coverage, short term negative national media coverage.  Widespread social media coverage  Confidence/trust impaired.  Project/activity credibility under question.  TfNSW and/or Ministers Department requires update.	Sustained negative State media coverage.  Regular 'talk-back' programs questioning credibility and capability.  Confidence and trust are severely damaged.  Widespread negative social media coverage.  Regular updates demanded by Minister.  Stakeholders withdraw their support recoverable at considerable cost, time and staff effort.	Sustained, high profile media attention at National level.  Material change in the public perception of the Agency.  Extensive negative social media coverage  Confidence and trust non-existing.  Government forced to reverse decision.  Stakeholders are actively campaigning against the organisation.

**Table 3.1.1: Environmental Incident Classification**

Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Regulations and compliance	<p>Low-level/Technical non-compliance with legal and/or regulatory requirement or duty by individuals or TfNSW- not reportable.</p> <p>Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify.</p>	<p>Non-compliance with whole or significant aspects of Government policy not reportable but requiring internal activity to put in place.</p> <p>Formal investigation and/or formal notification to regulator.</p> <p>Minor breach of contract by either party rectified through local management discussion.</p>	<p>Non-compliance with key Government policy - reportable and/or explanation required – need to put in place as soon as possible.</p> <p>Non-compliance – key obligation.</p> <p>Formal notification to regulator.</p> <p>Agency on notice.</p> <p>Breach of contract by either party rectified at Branch level management discussion.</p> <p>Small fine and no disruption to services.</p>	<p>Technical non-compliance with a minor Government Policy - not reportable.</p> <p>Low level non-compliance.</p> <p>Technical non-conformance.</p> <p>Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify.</p> <p>Substantial fine and no disruption to services.</p>	<p>Non-compliance with high profile, outward facing Government policy or Ministerial decree - immediately reportable to Government body (e.g. Treasury) and action to put in place required immediately (high priority).</p> <p>Continuous breach resulting in prohibition notices.</p> <p>Breach of significant, key aspects of contract by either party leading to lodgement (threat) to sue and recompense at severe financial levels</p> <p>Cessation of contract may occur.</p> <p>Large fines as a result of non-compliance.</p> <p>Licence or accreditation restricted or conditional affecting ability to operate.</p>	<p>Non-compliance with high profile Government policy or Ministerial decree - immediately reportable to Ministerial level requiring actions to put in place immediately (high priority) and progress to be reported to the Minister on an agreed and appropriate schedule.</p> <p>Litigation and potentially imprisonment.</p> <p>Loss of Operating licenses.</p> <p>Continued breach cannot be tolerated.</p> <p>Major contract breach by either party leading to significant litigation and financial costs</p> <p>Total breakdown and cessation of contract.</p> <p>Criminal prosecution as a result of non-compliance.</p>

### 3.1.2 Significant environmental incidents

Significant Incidents are environmental incidents that are serious in nature and have significant consequences warranting escalation to TfNSW senior management.

An environmental incident is to be defined and treated by the TfNSW Environment Manager as a potential Significant Incident if it meets one or both of the following:

- the severity of the incident is likely to be classified as C3, C2, or C1 in accordance with Section 3.1.1
- the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to be the subject of a penalty notice or prosecution

Potential Significant Incidents are escalated by TfNSW to the Executive Director Environment and Sustainability, who will determine whether the incident is deemed to be a Significant Incident and require further escalation to the Secretary and other senior management, to ensure they are aware of the incident and can implement or authorise any required responses.

The Significant Incident escalation process is detailed in Appendix A and Figure 3.2.1.

### 3.1.3 Report-only events

Report-only events are defined in section 6. Reporting requirements are detailed in section 3.2. Examples of report-only events include:

- Environmental incidents caused by weather events that are beyond the design capacity of environmental controls and/or mitigation measures in accordance with project specific requirements;
- Environmental incidents caused by persons or entities not associated with an activity being undertaken by TfNSW;
- Pre-existing conditions not associated with an activity being undertaken by TfNSW;
- Unexpected finds that are managed in accordance with relevant procedures / guidelines.

Despite these events being outside the scope of control of an activity, it is likely that a management response will be required to address them. As such, it is important that they are still reported (see section 3.2) to understand any resulting environmental impacts, inform trend analysis and any future activities in that location and allow any required management responses to be developed.

Report-only events can be considered to be unavoidable and so not reflecting the performance of a site, and will not be included in performance reporting. However, the response to a report-only event should be taken into account when considering site performance, as a deficient or inappropriate management response could result in a non-compliance and/or an environmental incident.

Where a report-only event relates to an unexpected find and the same issue can then reasonably be expected to be found at the same location in future, additional finds from that location need not be reported.

### 3.1.4 Non-compliances

Non-compliance is defined in section 6. Reporting requirements are detailed in section 3.2.

A non-compliance could also be an environmental incident.

### 3.1.5 Regulatory action

Regulatory action is defined in section 6. Reporting requirements are detailed in section 3.2.

Regulatory action includes, but is not limited to:

- Prosecutions
- Penalty notices
- Clean up notices
- Prevention notices
- Official cautions
- Formal warnings
- EPA show cause notifications.

Copies of any regulatory action issued by an environmental regulator must be provided as part of the reporting that is undertaken in accordance with section 3.2.

## 3.2 Reporting process

### 3.2.1 Standard reporting process

The standard reporting process for all environmental incidents, significant environmental incidents, report-only events, non-compliances and regulatory action is detailed in Figure 3.2.1.

Where the reporting process requires submission of a written report to TfNSW, the person making the report must use the following formats and meet the information requirements detailed within each:

- Road based and maritime projects: Environmental Event Reporting Form (624/400)
- Rail based projects: INX reporting system

Information included in reporting must be factual and accurate.

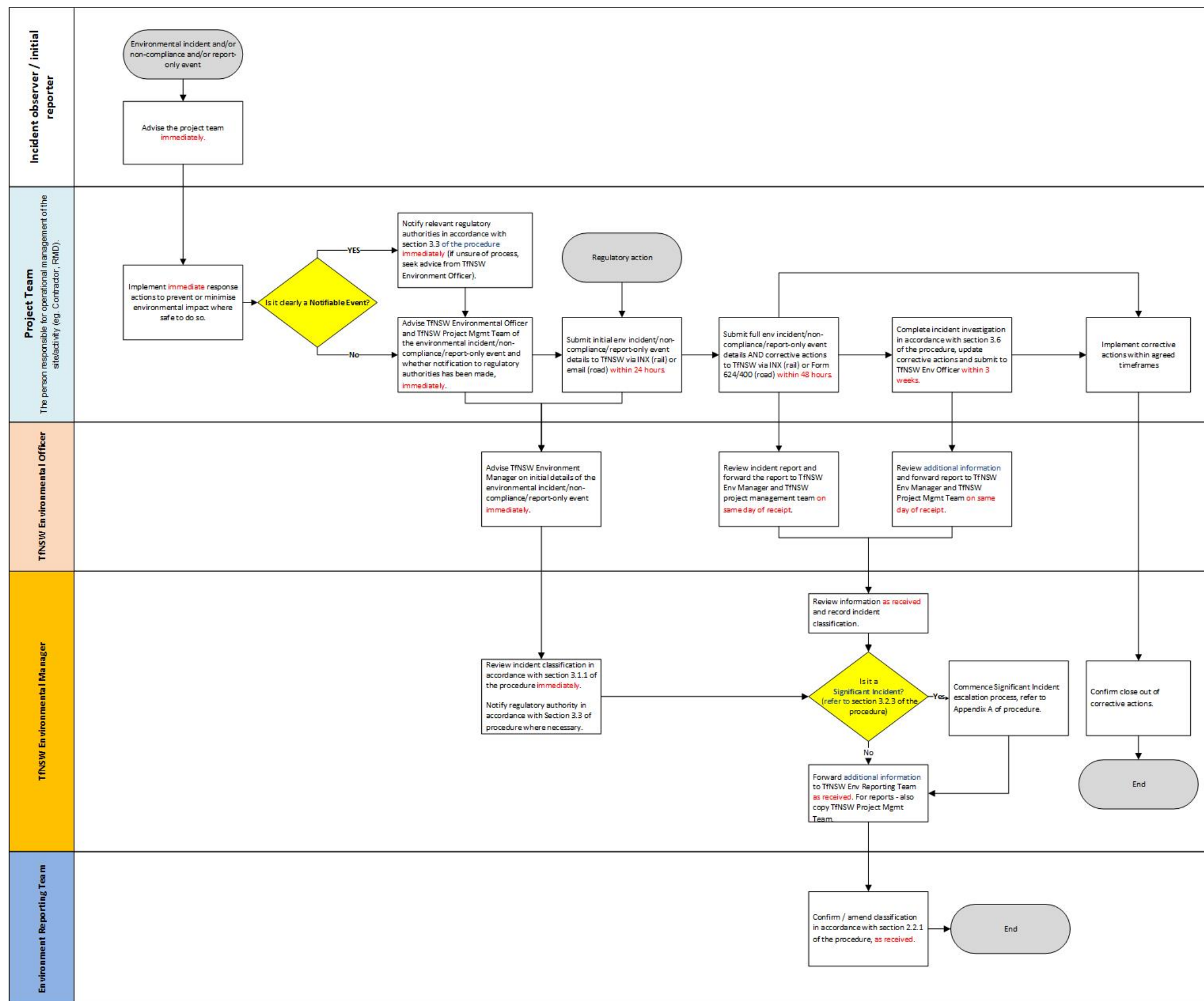
For the initial 24-hour email notification for road projects, the following information must be provided:

- Date of event
- Project / site name
- Type of event that has occurred (ie- environmental incident, incident and non-compliance, non-compliance, report-only or regulatory action)
- Description of the event
- Quantity / volume
- Immediate response actions that were implemented
- Notification/s undertaken.

In the case that regulatory action is received relating to a previously reported environmental incident, non-compliance or report-only event, reference to the relevant event must be made in the report for the regulatory action.



Figure 3.2.1: Reporting process



### 3.2.2 Other internal notifications

When reporting in accordance with Figure 3.2.1, TfNSW project management teams should also undertake the following internal notifications as appropriate:

- Corporate Communications / Media for any environmental incidents, report-only events, non-compliances and regulatory action that have potential for negative community or media attention;
- Legal Branch, for any environmental incidents, report-only events, non-compliances and regulatory action that could result in a (further, in the case of the latter) regulatory response against TfNSW. In these instances, limit written commentary on the incident by all staff, including emails;
- Safety Branch for any incidents that involve actual or potential risks to the health and safety of workers or the general public.

## 3.3 Notifiable events

A notifiable event is any environmental incident, report-only event or non-compliance (see section 3.1, above) that triggers a specific statutory requirement to notify an authority.

The key notification requirements are described below. Note each statutory requirement to notify may specify a particular person who is responsible to make the notification as well as the timing of when this must occur. The details of any notification conducted must be included in the reporting that is undertaken in accordance with section 3.2.

### 3.3.1 Material Harm pollution incidents

Under Part 5.7 of the POEO Act, there is a duty to immediately notify (i.e. promptly and without delay) each relevant authority (see section 3.3.2) of a pollution incident where material harm to the environment is caused or threatened.

The POEO Act states that a pollution incident should be considered Material Harm if:

*“(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*

*(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000”*

Material Harm only relates to pollution incidents. Other environmental incidents, such as conservation, heritage and planning breaches, are not included in the definition of a pollution incident.

### 3.3.2 Notification of Material Harm pollution incidents

The relevant authorities that must be notified for a Material Harm pollution incident are listed in tables 3.3.2a and 3.3.2b below. It is important to note the order of notification and phone numbers to use can vary depending on the nature of the pollution incident, as detailed in the two tables.

All of the authorities listed (whether considered relevant or not) must be contacted for each Material Harm pollution incident to satisfy POEO Act requirements. Serious penalties apply to both individuals and corporations for failing to notify Material Harm pollution incidents:

- Maximum penalty for individuals - \$500,000
- Maximum penalty for corporations - \$2,000,000.

**Table 3.3.2a: Authorities to notify for Material Harm pollution incidents that present an immediate threat to human health or property**

Order	Authority	Contact number
1	Fire and Rescue NSW	000
2	NSW EPA environment line	131 555
3	Ministry of Health (via the local Public Health Unit)*	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the <a href="#">NSW Health Website</a>
4	SafeWork NSW	131 050
5	The Appropriate Regulatory Authority*, being either: <ul style="list-style-type: none"> <li>Local council</li> <li>Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council).</li> </ul>	Local council - contact Office of Local Government on 4428 4100, or visit the <a href="#">Office of Local Government website</a>  Western Lands Commissioner – phone 6883 5400

**Table 3.3.2b: Authorities to notify for Material Harm pollution incidents that do **NOT** present an immediate threat to human health or property**

Order	Authority	Contact number
1	NSW EPA environment line	131 555
2	The Appropriate Regulatory Authority*, being either: <ul style="list-style-type: none"> <li>Local council</li> <li>Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council).</li> </ul>	Local council - contact Office of Local Government on 4428 4100, or visit the <a href="#">Office of Local Government website</a>  Western Lands Commissioner – phone 6883 5400
3	Ministry of Health (via the local Public Health Unit)*	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the <a href="#">NSW Health Website</a>
4	SafeWork NSW	131 050
5	Fire and Rescue NSW	1300 729 579

\* The appropriate contact for the Appropriate Regulatory Authority and Public Health Unit will vary according to the geographic location of the activity. These contact numbers should be found in advance and stored for immediate access (e.g. in a project's Construction Environmental Management Plan and/or on site notice boards) should a pollution incident need to be notified.

When notifying authorities, do not speculate on the origin, causes or outcomes of a pollution incident. Rather, state very simply and concisely the following only:

- a) The time, date, nature, duration and location of the incident

- b) The location of the place where pollution is occurring or is likely to occur, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- c) The circumstances in which the incident occurred (including the cause of the incident, if known)
- d) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If further information becomes known after the initial notification, that information must immediately be notified to all authorities in accordance with Section 150 of the POEO Act. The verbal notification must be followed by written notification to each relevant authority within seven days of the date on which the incident occurred, setting out the above information.

### 3.3.3 Summary of other regulatory agency notification requirements

A summary of the other key statutory notification requirements that could arise from TfNSW environmental incidents, report-only events and non-compliances is provided in Table 3.3.3.

**Table 3.3.3: Regulatory agency notification requirements**

Event type	Legislation	Part / section	Agency	Notification requirement
<b>Discover Aboriginal object</b>	<i>National Parks and Wildlife Act 1974</i>	Section 89A	Heritage NSW	Notify the Secretary of the Department of Planning, Industry and Environment in writing using the form approved by the Secretary (if any) within a reasonable time after becoming aware
<b>Discover Aboriginal remains</b>	<i>Commonwealth Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Section 20	Commonwealth Department of Agriculture, Water and the Environment	Notify the Commonwealth Minister in writing as soon as practicable after becoming aware, giving particulars of the remains and their location
<b>Discover non-Aboriginal relic</b>	<i>Heritage Act 1977</i>	Section 146	Heritage NSW	Notify the Heritage Council in writing within a reasonable time after becoming aware
<b>Fires</b>	<i>Rural Fires Act 1997</i>	Section 64	NSW Rural Fire Services	Notify an appropriate fire officer of the inability to extinguish any fire burning during a bush fire danger period applicable to the land.
<b>Land contamination</b>	<i>Contaminated Land Management Act, 1997</i>	Section 60(1)	EPA	Notify EPA in writing as soon as practicable after becoming aware of the contamination, where required as prescribed in the EPA  <a href="#">‘Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997’</a>
<b>Non-compliance</b>	Various	N/A	Various	Requirements to notify the relevant regulatory authority when a non-compliance has occurred (eg- with a Condition of Approval issued under Division 5.2 of the EP&A Act)
<b>Pollution incident (material harm)</b>	<i>Protection of the Environment Operations Act, 1997</i>	Part 5.7	EPA	See section 3.3.2
<b>Pollution incident in water supply catchment area</b>	Various	N/A	N/A	Notify the relevant water supply authority if an environmental incident has the potential for unapproved impacts on a drinking water supply



### 3.4 Requests for written reports from regulatory authorities

If TfNSW receives a request from an environment regulatory authority for a written report regarding an environmental incident, report-only event or non-compliance, the relevant Environment Manager must be immediately contacted for advice. No further correspondence (including email) about the event should be distributed either internally or externally until advice is received. E&S will then coordinate with Legal Branch to:

- assist in the investigation of the environmental incident, report-only event or non-compliance
- provide legal advice to the project
- co-ordinate the preparation of the written response to the regulatory authority.

### 3.5 Corrective actions

A key aspect of the TfNSW Environment and Sustainability Policy that is addressed through this procedure is being accountable for addressing and minimising the environmental impacts of TfNSW activities. This can be achieved by developing appropriate corrective actions and implementing them within a timely manner following an environmental incident, with the aim of avoiding a repeat of that incident.

There are a variety of scenarios in which an environmental event may occur on a TfNSW project. It is important that corrective actions are:

- specific to the incident that has occurred
- meaningfully address the root cause(s) of the incident
- designed to prevent incident reoccurrence.

Corrective actions could include (but are not limited to) the following:

- physical works to install, augment or rectify controls or a site issue
- testing and/or monitoring
- review and improvement of construction methods or work practices
- review and update of management plans, procedures or other tools
- communication, training and awareness initiatives for workers.

In most cases it will not be sufficient to simply notify workers of correct systems / procedures (e.g. via toolbox talk). A review should be undertaken by the project team following an incident or non-compliance to determine why the systems / procedures failed (or alternatively a formal investigation, when required by section 3.6), and necessary changes made to ensure they do not fail in future. Site staff should then be made aware of the changes and trained as necessary.

Immediate/short-term corrective actions including timeframes for completion must be clearly described in incident/non-compliance reporting. Updates about longer-term corrective actions including timeframes for completion can be provided to the TfNSW Environment Officer and TfNSW Project Management Team post submission of the incident/non-compliance report.

### 3.6 Investigations

Serious environmental incidents and non-compliances must be investigated to identify the causes, with the purpose of preventing a recurrence. A root cause analysis investigation must be completed by the project team for all environmental incidents with a classification of C1, C2 or C3, or any other environmental incidents or non-compliances as determined by TfNSW.

The scope of the investigation will be determined by the TfNSW Environment Officer or Environment Manager. The project team must provide TfNSW with a final investigation report

within three weeks of the environmental incident or non-compliance being identified. The report must include the minimum information described in Table 3.6 (below).

Table 3.6: Investigations	
Element	Description
Sequence of events	The sequence of events that led to the incident or non-compliance
Findings	Given the sequence of events, what are the key findings of the investigation (i.e. what are the main causes of the incident or non-compliance).
Management methods	A record of the management methods to be changed and/or implemented to avoid the incident or non-compliance reoccurring.
Key learnings	Describe the key learnings from the investigation into the incident or non-compliance. Detail which learnings may be relevant to other transport projects.

## 4 Accountabilities

Table 4 details the key accountabilities for implementing this Procedure.

Table 4: Key accountabilities	
Requirement	Detail
Environment Director	Oversee compliance with the procedure and make the final determination on the classification of all environmental incidents, report-only events and non-compliances
Environment reporting team	Recording of all environmental incidents, report-only events, non-compliances and regulatory action, confirm / amend the classification of environmental incidents, report-only events and non-compliances in accordance with section 3.1 and monitor compliance with the Procedure
Executive Director Environment and Sustainability	Make determinations on whether an environmental incident will be considered a Significant Incident (see section 3.1.2). Assume the role of Information Distributor when a Significant Incident has occurred (see Appendix A).
Observer of environmental incident, report-only event, non-compliance or regulatory action	Immediately report in accordance with Figure 3.2.1
Person/s responsible for environmental incident, report-only event, non-compliance or regulatory action	Report and respond in accordance with Figure 3.2.1
Project Managers	Provide appropriate resources to respond to an environmental incident, report-only event, non-compliance or regulatory action in accordance with this Procedure

**Table 4: Key accountabilities**

Requirement	Detail
TfNSW Environment Manager	Report environmental incidents, report-only events, non-compliances or regulatory action in accordance with Figure 3.2.1, assign initial classification in accordance with section 3.1.1, monitor corrective actions, and actively promote compliance with this procedure at a program level. Assume the role of Information Controller when a Significant Incident has occurred (see Appendix A).
TfNSW Environment Officer	Report environmental incidents, report-only events, non-compliances or regulatory action in accordance with Figure 3.2.1, monitor corrective actions and actively promote compliance with this procedure at a project level

## 5 Related policy, systems and documents

The following documents and systems are available on agency intranets and the internet:

- Environmental Event Report Form (for use by road and maritime sites and projects)
- INX system (for use by rail and light rail sites and projects)
- Environment and Sustainability Policy
- Unexpected finds procedures – refer to relevant guideline/procedure

## 6 Definitions and acronyms

All terminology in this Procedure is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning:

- **Significant incident** – an environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management
- **DPIE** – Department of Planning, Industry and Environment
- **Environment Director** – consists of Associate Director Environmental Management; Director Environment Motorways; Director Environment Regions; Director Environment Sydney
- **Environment Manager** – consists of Environment Manager or Senior Manager Environment from Environment and Sustainability Branch
- **Environment Officer** – consists of Environment Officer and Environment and Planning Manager from Environment and Sustainability Branch
- **Environment Reporting team** – consists of those in Environment and Sustainability Branch responsible for administering and maintaining the EnvOps mailbox and INX reporting system (for environment entries)
- **Environmental event** – a report-only event, non-compliance, regulatory action or environmental incident
- **Environmental incident** - An environmental incident is an event or set of circumstances, as a consequence of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur. Adverse environmental impact includes contamination, harm to flora and fauna (either individual

species or communities), damage to heritage items and adverse community impacts. An unexpected find that is not managed in accordance with relevant procedures / guidelines is also considered an environmental incident

- **EPA** - NSW Environment Protection Authority
- **EPL** – Environment Protection Licence (issued by EPA)
- **E&S** – (Safety, Environment and Regulation) Environment and Sustainability Branch
- **Investigation** – The process by which the cause(s) of an environmental incident is examined and identified.
- **INX reporting system** – the online system used to record and track environmental incidents, report-only events, non-compliances and regulatory action relating to rail projects and premises.
- **Non-compliance** - a failure to comply with any condition of approval, environmental assessment safeguard / mitigation measure, licence condition, permit or any other statutory approval relevant to the activity and/or area where the activity occurs;
- **Notifiable event** - Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.
- **POEO Act** - Protection of the Environment Operations Act 1997
- **Pollution** – Pollution (including air pollution, water pollution, noise pollution and land pollution) as defined in the dictionary to the POEO Act.
- **Pollution incident** – Has the same meaning as defined in the dictionary to the POEO Act.
- **Regulatory action** - any formal regulatory response from an environmental regulator including but not limited to penalty notices, clean-up notices, prevention notices, official cautions, show cause notices and formal warnings.
- **Report-only event** - An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.
- **RMS** – Roads and Maritime Services
- **TfNSW** – Transport for NSW (excludes the operating agencies: Sydney Trains; Sydney Metro; State Transit Authority; NSW TrainLink)
- **Transport Cluster** – all TfNSW divisions and operating agencies (includes the operating agencies: Sydney Trains; Sydney Metro; State Transit Authority; NSW TrainLink)
- **Unexpected find** – An unexpected discovery such as a heritage item, threatened species, contamination, asbestos or hazardous substance.
- **WHS** – Work Health and Safety

## 7 Document control

### 7.1 Superseded documents

This Procedure replaces the following documents:

- Roads and Maritime Services Environmental Incident Classification and Reporting Procedure (RMS 17.374)
- Transport for NSW Environmental Incident Classification and Reporting (PR-105)

## 7.2 Document history

Date & Procedure No	Document owner	Approved by	Amendment notes
19/07/2021 EMF-13/PR-0001	Environment Manager Performance Improvement	Executive Director Environment and Sustainability	N/A

## 7.3 Feedback and help

For advice on using this Procedure please contact:

Environment Manager Performance Improvement

Email: [envops@rms.nsw.gov.au](mailto:envops@rms.nsw.gov.au)

Phone: (02) 8849 2586.



## Appendix A: Significant Incident escalation process

### A1 Confirmation of a Significant Incident

Where an Environment Manager believes that a Significant Incident has occurred (see section 3.1.2 and Figure 3.2.1), they must immediately phone the relevant Environment Director. The Environment Director will consult with the Executive Director Environment and Sustainability, who will determine whether the incident will be considered a Significant Incident. Once a Significant Incident has been determined, the escalation process will commence in accordance with sections A2 and A3, below.

### A2 Significant Incident information management

Following determination of a Significant Incident (see section A1, above), it is essential that there is fast, consistent and accurate reporting of information to the TfNSW senior management. As such, clear roles and responsibilities must be established in two key areas, as described in Table A2.

**Table A2: Roles and responsibilities during a Significant Incident**

Role	Who	Responsibilities
Information Controller	Environment Manager (or relevant Environment Officer in their absence)	<ul style="list-style-type: none"> <li>• Liaise between the on-site TfNSW project management team and the Information Distributor (below)</li> <li>• Be the single point of contact to provide information and updates about the status of the Significant Incident to the Information Distributor</li> </ul>
Information Distributor	Executive Director Environment and Sustainability (or relevant Environment Director in their absence)	<ul style="list-style-type: none"> <li>• Identify the relevant members of the Executive and other senior management that will form the distribution group to be informed about the Significant Incident (see Table A3)</li> <li>• Consolidate information from the Information Controller, and distribute it to the distribution group</li> <li>• Provide key ongoing updates to the distribution group as it becomes available</li> <li>• Respond to enquiries from the distribution group, ensuring all members of the distribution group are copied into every response</li> </ul>

### A3 Parties to be notified

As described in Table A2, the Information Distributor must identify relevant TfNSW senior management from delivery and client divisions that will form the distribution group to be informed about the Significant Incident, including ongoing updates. Table A3 provides the key positions that must be included (at a minimum), depending on who is undertaking the activity. Depending on the type and location of the activity, there may be other areas of TfNSW that should be included in the distribution group – see section 3.2.2.

The distribution group should all be notified concurrently in a single email that a Significant Incident has occurred. The email should be sent by the Information Distributor within five minutes of making the determination of the Significant Incident.

<b>Table A3: TfNSW distribution group to be notified during a Significant Incident</b>		
	<b>Greater Sydney (Client)</b>	<b>Regional &amp; Outer Metropolitan (Client)</b>
Transport exec notification	<ul style="list-style-type: none"> <li>Secretary</li> </ul>	<ul style="list-style-type: none"> <li>Secretary</li> </ul>
SER exec notification	<ul style="list-style-type: none"> <li>Deputy Secretary, Safety Environment and Regulation</li> </ul>	<ul style="list-style-type: none"> <li>Deputy Secretary, Safety Environment and Regulation</li> </ul>
Client exec notification	<ul style="list-style-type: none"> <li>Deputy Secretary, Client Division</li> <li>Executive Director, Community and Place</li> <li>Relevant City Director (Harbour/River/Parkland)</li> </ul>	<ul style="list-style-type: none"> <li>Deputy Secretary, Client Division</li> <li>Executive Director, Community and Place</li> <li>Relevant Regional Director</li> </ul>
Delivery exec notification	<ul style="list-style-type: none"> <li>Deputy Secretary, relevant Delivery Area</li> <li>Executive Director (or equivalent) of relevant Delivery Area (e.g. Head of Sydney Project Delivery, Head of Rail Delivery, Chief Operations Officer, Executive Director Planning and Programs)</li> <li>Director of relevant Delivery Area (e.g. WSPO, GSPO, Parramatta Light Rail, Rail Infrastructure Delivery, Sydney Maintenance, Easing Sydney's Congestions etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Deputy Secretary, relevant Delivery Area</li> <li>Executive Director (or equivalent) of relevant Delivery Area (e.g. Head of Regional Project Delivery, Executive Director Network and Assets)</li> <li>Director of relevant Delivery Area (e.g. Regional Maintenance, NPO, SaWPO)</li> </ul>
Project Team notification	<ul style="list-style-type: none"> <li>Project Director (or equivalent) of relevant Delivery Area</li> <li>Senior Project Manager</li> <li>Project Manager</li> <li>Environment Manager</li> </ul>	<ul style="list-style-type: none"> <li>Project Director (or equivalent) of relevant Delivery Area</li> <li>Senior Project Manager</li> <li>Project Manager</li> <li>Environment Manager</li> </ul>



## Appendix A6: Environmental Work Method Statement template





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## Environmental Work Method Statement for **XXXX**

Project Name: Parramatta Light Rail Stage 2 Enabling Works

Contract Number: PD-22-12894

Document Number: PLR2EW-JHG-NWW-EV-WMS-**000XX**

Revision: **X**

Revision Date: **XXX**





## Table of Contents

*Insert table of contents.*







## List of Tables

*Insert List of tables*





## List of Figures

*Insert List of Figures*





## 1. Introduction

### 1.1 Context

*Insert details of the context of the EWMS.*

### 1.2 Scope of works

*Insert details of the scope of works for the EWMS.*

### 1.3 Compliance assessment

*Insert details of the assessment of compliance against relevant applicable requirements.*

*Table 28 – EWMS compliance requirements*

Clause	Details	EWMS reference

### 1.4 Consultation

*Insert details of any required consultation for the EWMS.*

### 1.5 Work area

*Insert details of the work area specific for the EWMS.*

### 1.6 XXX

*Insert other background information required specific for the EWMS.*





## 2. Methodology

### 2.1 Methodology

*Insert the proposed methodology specific for the EWMS.*

### 2.2 Roles and responsibilities

*Insert details of the specific roles and responsibilities for the implementation of the controls detailed in the EWMS.*

### 2.3 Training requirements

*Insert details of the specific training requirements for the EWMS.*

### 2.4 XXX

*Insert other information relevant to the methodology specific for the EWMS.*





### 3. Reporting

*Insert details of the reporting and/or notification requirements for the EWMS.*







## Appendix A7: AA and ER Endorsements



# Acoustics Advisor Endorsement Letter

Attention: Transport for NSW (PLR2EW)

Reference: PLR2EW-JHGRP-NWW-PM-PLN-000013.Rev0\_CEMP\_AA\_Endorsement\_22.01.2025

Date: 22 January 2025

**Re: PLR2EW (SSI-10035)**  
**Construction Environmental Management Plan (CEMP) Rev 0**  
**Adequacy for Submission (AA Review)**

Beau Weyers, BEng(Mech), MAAS, RPEQ 09343, appointed Acoustic Advisor (AA), reviewed the following documentation with regard to the Parramatta Light Rail Stage 2 Enabling Works project:

Document Title:	Document Reference:	Version Status:
Construction Environmental Management Plan (CEMP)	PLR2EW-JHGRP-NWW-PM-PLN-000013	Revision 0, 14 January 2025

Pursuant to Conditions of Approval A35(e), the review confirms the documents have been reviewed for consistency by the AA, and the document remains in agreement with the acoustic requirements of the Terms of Approval (NSW Government – Infrastructure Approval (Application No.: SSI 10035)), as well as best practice methodologies for acoustics.

Prepared by:		Authorisation:	
Date of issue:	22 January 2025	Signature of AA	

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REF: A01044 PLR2A CEMP endorsement 250121

Tuesday 21<sup>st</sup> January 2025

[REDACTED]

Senior Manager Environment  
Transport for NSW  
Parramatta Light Rail

## Re: Construction Environment Management Plan (CEMP)

Pursuant to SSI10035 Condition of Approval A30 (d) i), as the approved Environmental Representative, I confirm that I have reviewed the Construction Environment Management Plan (PLR2EW-JHGRP-NWW-PM-PLN-000013), revision 0, dated 14 January 2025, prepared by John Holland Group, for consistency with the requirements of the Conditions of Approval.

In my opinion the aforementioned document is consistent with the requirements included in or required under the terms of the Conditions of Approval for the Parramatta Light Rail (Stage 2) development.

Yours sincerely,

[REDACTED]

[REDACTED]

Environmental Representative  
The APP Group

[REDACTED]  
[REDACTED]