

Justin Perrott  
Associate Director, Environmental Management  
Transport for NSW  
Locked Bag 5085  
PARRAMATTA NSW 2124

09/06/2021

Dear Mr Perrott,

**Redfern Station Upgrade (SSI 10041): New Southern Concourse  
Environmental Representative Inspection Frequency**

I refer to your submission dated 10 May 2021 requesting a change to the Environmental Representative (ER) inspection frequency as detailed in Transport for NSW's (TfNSW) Construction Environmental Management Framework (CEMF) listed under condition A1 of SSI 10041. I also acknowledge your response to the Department's request for additional information.

I note that TfNSW's CEMF Revision 9.0 dated 28 October 2020 details that ER inspections will occur weekly. I also note that Novo Rail's Construction Environmental Management Plan (CEMP) Revision 07 dated 22 January 2021 details that ER inspections will occur weekly, during possessions, high risk activities, following incidents and in relation to complaints received.

I understand that you wish to adopt a risk-based approach for ER inspections, focusing on inspections during weekend possessions where higher-risk activities would occur on site resulting in inspections occurring approximately every fortnight. I note that this approach will still allow the ER to conduct weekly inspections depending on the site activities and risks.

I raise no issues with the proposed change to the ER inspection frequency subject to the following:

- Submission of a detailed 3-month inspection program forecast, including ER inspection frequency to be provided to the Department for the duration of project construction; and
- the CEMP be updated to reflect the ER inspection frequency.

You are reminded that as per section 2.6 of the Department's *Environmental Representative Protocol* (2018), the ER should undertake additional inspections as appropriate in response to incidents, non-compliances and poor performance. Should any increase in work activities have a higher level of community or environmental risk, it would be expected that the frequency would return to weekly for these periods at the discretion of the ER.

If you have any questions, please contact Shelley Reed on 9873 8572 or at [shelley.reed@dpie.nsw.gov.au](mailto:shelley.reed@dpie.nsw.gov.au).

Yours sincerely



**Jake Shackleton**

Director – Infrastructure Management

As nominee of the Planning Secretary