

Planning Approval Environmental Review Form

SM ES-FT-414

Sydney Metro Integrated Management System (IMS)

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Prepared by:	Parklife Metro
Prepared for:	Sydney Metro and Parklife Metro
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Environmental Review

1. Proposed works and justification

An environmental review is applicable to design changes and is required to demonstrate compliance with the conditions of approval and would have no additional impacts on the community and/or the environment. This environmental review is required to demonstrate compliance with the conditions of approval and the Sydney Metro – Western Sydney Airport (SM-WSA) Environmental Impact Statement (EIS) and Submissions Report. A description of activities is listed in Table 1 and an assessment provided in Section 3.

Table 1 Description of proposed works

Description	Overview
Location of works	<p>The proposed works are located at 215 Badgerys Creek Road, Bradfield NSW 2556 (Lot 3101 DP1282964), within the existing Aerotropolis Core construction footprint extending east to the site boundary adjacent to Thompsons Creek. The proposed works then run north-east along the site boundary before extending east into Lot 274 DP 803167. Landowner consent will be obtained by Sydney Metro prior to the works commencing.</p> <p>The location of the proposed works is shown in Figure 1 below. The surveyed boundary of the proposed extended easement and coordinates is included in Attachment 1.</p>
Scope of works	<p>The scope of the proposed works is temporary for the duration of the SM-WSA construction stage and involves:</p> <ul style="list-style-type: none"> • Extending a pipeline from the site Water Treatment Plant (WTP) and construction footprint to Thompsons Creek. The works area would be approximately 230 metres in length within Western Parkland City Authority (WPCA) land (and will extend another 45 meters into Thompsons Creek within an adjacent lot (Lot 274 DP 803167). • Installation of an overland lay-flat pipeline from the WTP supported by a block footing or support at approximately 12 metre intervals to secure the pipeline (refer to Attachment 2). • Installation of a length of steel pipe (approx. 4.5m) and construction of a road base ramp to allow access across the pipeline for WPCA contractors. Geotech material, or similar, will be used under the road base to assist with decommissioning. The location of the ramp will be determined on site with WPCA contractors. • Discharge point of the pipeline to the bank of Thompsons Creek, including scour protection to prevent potential erosion or sedimentation (this would take the form of geo-fabric or coir blanket on the bank of the creek where the pipe discharges into Thompsons Creek or an attachment to the pipe to disburse the water and avoid impact on the creek bed and banks). • Installation of the pipeline will minimise impacts to existing fences. Fencing will be made good around the pipeline to prevent stock escape or access by kangaroos • Removal of the pipeline upon completion of the SM-WSA construction stage at Aerotropolis Core. <p>No vegetation removal or ground disturbance is required for the proposed works.</p> <p>The proposed works will be constructed in March 2024 (pending landowner consent being issued) and take approximately two days to complete. The proposed works will be operational for the duration of the SM-WSA construction stage.</p>

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Description	Overview
	<p>The proposed works are detailed in Figure 1.</p>
<p>Justification for works</p>	<p>As noted in Section 8.9.8 of the SM-WSA EIS, the excavation of the tunnels, stations and shafts is likely to intercept groundwater, resulting in the need to capture, treat and reuse or discharge water. Treated water that cannot be recirculated [for surface dust suppression] would be discharged from the sites via construction WTPs.</p> <p>As stated in the revised project description, (Section 2.11.3 of Appendix B of the Submissions Report), treated water surplus at the Aerotropolis Core during construction would be discharged to Thompsons Creek, with the connection and discharge point identified during design development. The planning approval specified criteria for this discharge point which is discussed further in Section 2.</p> <p>The proposed works would:</p> <ul style="list-style-type: none"> • Allow discharge of treated groundwater and surface water collected in the Aerotropolis Station box during construction • Reduce or eliminate potential scouring and impacts to the riparian vegetation of Thompsons Creek through the extended pipeline to the creek bank • Avoid impacts to the riparian vegetation of Thompsons Creek.
<p>Timeframe for works</p>	<p>The proposed works are intended to occur in March 2024 over approximately two days. The use of the pipeline is for the duration of the SM-WSA construction stage subject to ongoing landowner agreements.</p>
<p>Work hours, workforce and equipment / machinery</p>	<p>The proposed works are expected to be completed during standard construction hours:</p> <ul style="list-style-type: none"> • Monday to Friday 7am – 6pm • Saturday 8am – 1pm • No work on Sundays or Public Holidays. <p>Construction</p> <p>Up to two construction workers would be onsite undertaking the installation. Plant and equipment required includes:</p> <ul style="list-style-type: none"> • Hand tools • Light vehicles <p>Operation and maintenance</p> <p>Up to two construction workers would be onsite along the discharge pipeline route periodically during operation of the water treatment plant, including:</p> <ul style="list-style-type: none"> • weekly inspections during operation of the pipeline and prior to use if the pipeline has not been discharged for > 2 weeks. • The inspection would include visual observation along the pipeline route and the discharge location to confirm that <ul style="list-style-type: none"> ○ the pipeline is secure and functional (no leaking) ○ WPCA maintenance vehicle access over the pipeline is secure and functional ○ the discharge location is appropriately protected with no evidence of scouring or damage • The inspection may coincide with surface water monitoring requirements as required by the conditions of the Project Environmental Protection Licence (EPL) no. 21807

Description	Overview
	<ul style="list-style-type: none"> Inspections would be recorded in the Parklife Metro GLAASS software as part of routine environment inspections <p>Inspection of the pipeline may be taken out without access from The Retreat. Access through Lot 274 DP 803167 would be required to reach the discharge point for inspection or sampling purposes, but would avoid the residential portion of the lot. Weekly inspection of the discharge point is proposed (as above). Sampling would be in accordance with environmental protection licence (EPL) conditions which are yet to be issued for the point.</p> <p>Decommissioning</p> <p>Up to two construction workers would be onsite for 1-2 days to decommission the pipeline including removal of footings and temporary ramp.</p> <p>Plant and equipment required includes:</p> <ul style="list-style-type: none"> Hand tools Light vehicles

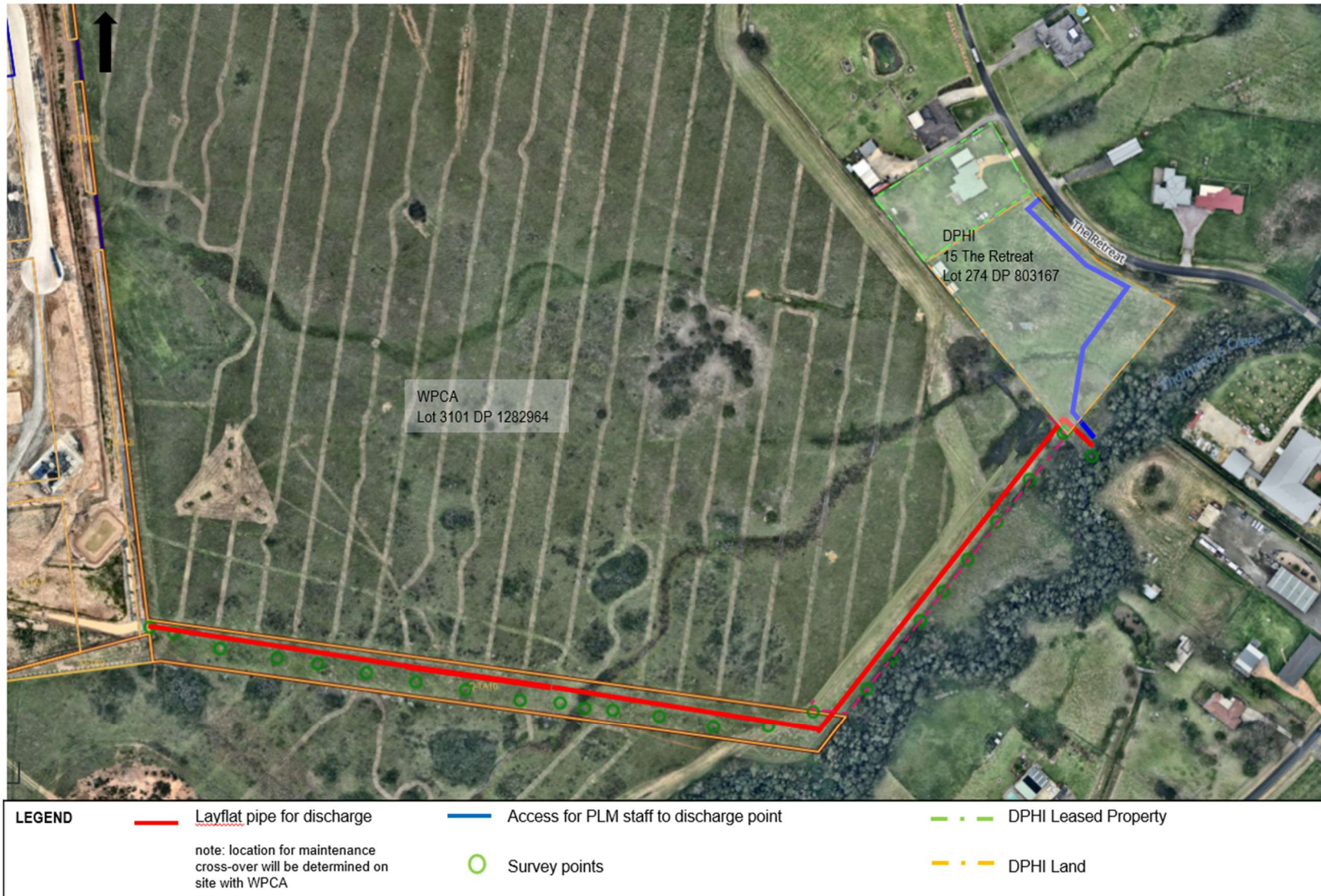


Figure 1 Aerotropolis Core construction footprint with WTP pipeline. The location of the steel pipe and road base ramp along the layflat pipe alignment will be determined in consultation with WPCA

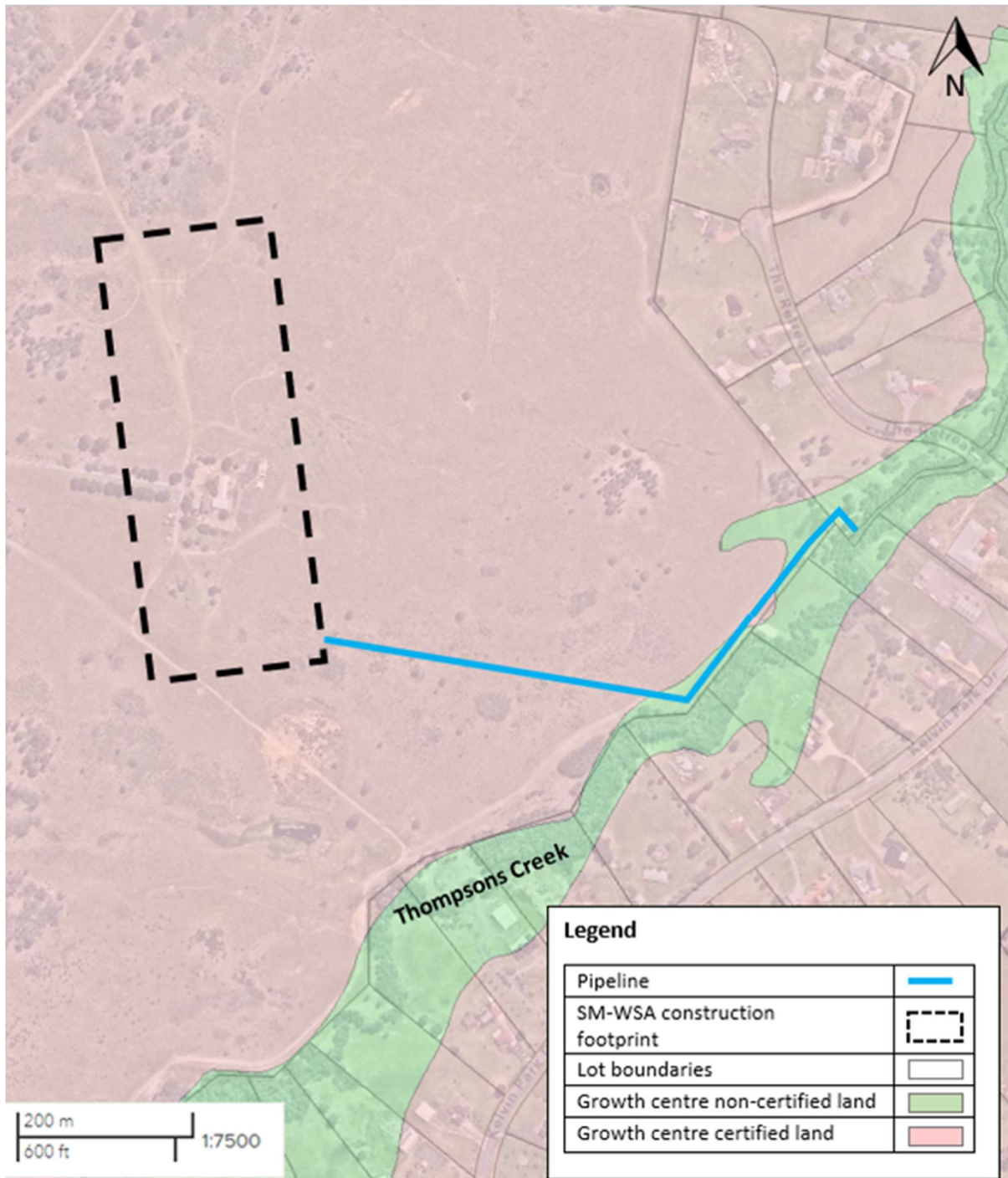


Figure 2 Aerotropolis Core construction footprint and pipeline in relation to certified and non-certified land of the South West Growth Centre

2. Consistency with Conditions of Approval

The following table outlines whether the proposed changes would be consistent with the relevant Conditions of Approval.

Table 2 Comparison of the proposal with relevant elements of the Approved Project

Relevant elements of the Approved Project		Discussion
<p>Section 2.11.3 of Appendix B of the Submissions Report (Surface Water discharge to Thompsons Creek)</p>	<p>At Aerotropolis Core treated water, surplus to reuse requirements during construction, would be discharged to Thompsons Creek. The location of the connection and discharge point would be identified during design development and be subject to the following performance criteria:</p> <ul style="list-style-type: none"> No removal of vegetation within the riparian zone areas adjacent to Thompsons Creek or outside the boundary of certified areas identified in the strategic assessment and conservation planning undertaken for the South West Growth Area; The works must be consistent with the specific mitigation measures and performance outcomes described in Chapter 7 of the Submissions Report (Revised performance outcomes and mitigation measures). 	<p>Figure 2 shows the boundary of certified and non-certified areas identified in the strategic assessment and conservation planning undertaken for the South West Growth Area.</p> <p>The pipeline will need to enter the non-certified areas but no riparian vegetation will be disturbed or cleared during the installation and operation of the discharge pipeline into Thompsons Creek.</p> <p>The works can be managed consistent with relevant mitigation measures and performance outcomes (POs) as revised in Chapter 7 of the SM-WSA Submissions Report. These are discussed further in this table.</p>
Project Performance Outcomes		
<p>Revised Performance Outcome (Biodiversity)</p>	<p>No removal of any vegetation within the Thompsons Creek riparian zone or any adjacent areas that are non-certified under the South West Growth Area</p>	<p>No clearing would occur within the riparian zone located adjacent to Thompsons Creek or outside the boundary of certified areas identified in the <i>State Environmental Planning Policy (Precincts – Western Parkland City 2021)</i> strategic assessment and conservation planning undertaken for the South West Growth Area.</p>

<p>Revised Performance Outcome (Aboriginal Heritage)</p>	<p>The heritage significance of Aboriginal objects and places are protected, conserved and/or managed in order to ensure the project does not diminish the story and cultural understanding associated with the objects and places of Aboriginal people in New South Wales</p>	<p>An AHIMS search was undertaken on 29 February 2024 identifying 17 AHIMS sites within WPCA land (Lot 3101 DP 1282964) (see Attachment 3). Sites identified in this search correspond to those identified in the SM-WSA EIS and Submissions Report. One site 45-5-2621 was identified as adjacent to the discharge pipeline. This site was not discussed in detail in the SM-WSA EIS as it was 200m outside the construction footprint.</p> <p>Further detailed information has been found for AHIMS ID 45-5-2621, documented as part of a Cultural Heritage Assessment Report (Extent Heritage, 2021) for the Bradfield City Centre State Significant Development SSD 25452459 assessment on behalf of the Western Parkland City Authority. The site is described as recorded in 1996 as an open camp site, with limited site card information. The study area for the Extent Heritage investigations is shown in Attachment 3, Figure 3b.</p> <p>An archaeological survey of the site was completed on 7 December 2020 and the following survey details were provided for the area of AHIMS ID 45-5-2621</p> <p><i>“The survey team completed expanding radial transects from the AHIMS registered GPS location of the site to relocate the previously recorded artefacts. The location of B 19 (AHIMS ID 45-5-2621) was found to be covered in manicure grass, which limited surface visible. As a result, no Aboriginal objects were identified at the AHIMS registered location of B 19 (AHIMS ID 45-5-2621).”</i></p> <p>The Figures below were provided in the Extent Heritage (2021) report and included for reference below</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="1301 1007 1637 1262">  </div> <div data-bbox="1648 1007 1984 1262">  </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div data-bbox="1301 1270 1637 1310"> <p>Figure 37. View north across B 19 (AHIMS ID 45-5-2621).</p> </div> <div data-bbox="1648 1270 1984 1310"> <p>Figure 38. View west across B 19 (AHIMS ID 45-5-2621).</p> </div> </div>
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		<p>Sites unable to be relocated were discussed further within Extent Heritage (2021) report. A range of post-depositional processes responsible for the mobility of artefacts within soil and across the ground were discussed and include; animal trampling, seasonal inundation of the sites causing downslope movements, deposition of sediment over the surface artefacts reducing visibility.</p> <p>The Extent (2021) study described identification of 14 Aboriginal objects across the 115.7 ha area from three Aboriginal sites. An additional seven Aboriginal sites which were previously registered within the study area, could not be located during the completion of the archaeological survey. The most likely reason for the sites being unable to be located being they have been concealed or removed from the study area by taphonomic processes. The report concludes that the archaeological integrity of surface artefacts across the majority of the study area is low and meaningful interpretations of Aboriginal land use cannot be established from a study of the spatial distribution of these artefacts.</p> <p>As previously stated the proposed works will require an overland lay-flat pipeline from the water treatment plant supported by a block footing at approximately 12 metre intervals to secure the pipeline. The blocks will sit on top of the ground surface and no ground disturbance is required.</p> <p>As no excavation, ground penetration or other ground disturbance would be required, no additional impacts are anticipated as a result of the works. This is consistent with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010), where no ground disturbance is required, works can commence without any further approval required.</p> <p>While the site card for AHIMS ID 45-5-2621 is still active, the site was unable to be relocated and is no longer considered to be in the recorded location. Any potential artefacts encountered within the alignment will be managed in conjunction with the Project Heritage Consultant under Sydney Metro’s Unexpected Heritage Finds Procedure, which is included as Appendix B of the Parklife Metro Non-Aboriginal Heritage Management Sub-plan and as Appendix A of Sydney Metro Aboriginal Cultural Heritage Management Plan.</p> <p>Prior to works commencing, a toolbox will be delivered to the workforce to communicate the location of the identified sites and outline the requirements of the Unexpected Heritage Finds Procedure.</p>
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Relevant elements of the Approved Project		Discussion
Revised Performance Outcome (Aboriginal heritage)	Impacts on areas of archaeological sensitivity and significance are avoided or minimised, where practical	As noted in Section 3, the works are within the vicinity of previously identified Aboriginal heritage sites. Nonetheless, given that no ground disturbance would be required, no additional impacts are anticipated as a result of the works. Any potential artefacts encountered within the alignment will be managed under Unexpected Heritage Finds Procedure. Prior to works commencing, a toolbox will be delivered to the workforce to communicate the location of the identified sites and outline the requirements of the Unexpected Heritage Finds Procedure.
Revised Performance Outcome (Flooding, hydrology and water quality)	Water discharged from the project, including runoff from hardstand areas, surface and ground water storages would: <ul style="list-style-type: none"> contribute towards achieving ANZECC guideline water quality trigger values for physical and chemical stressors for slightly disturbed ecosystems in lowland rivers in southeast NSW, or meet any water quality criteria determined in consultation with the NSW Environment Protection Authority (off-airport) where an EPL is required or in consultation with Western Sydney Airport in accordance with the <i>Airports (Environmental Protection) Regulations 1997</i> (on-airport) 	Environmental Protection Licence (EPL) 21807 applies to the SSTOM Package of the SWM-WSA project (managed by PLM), and includes this area of works. All works will be undertaken in accordance with the requirements of the PLM EPL including water quality discharge criteria.
REMMS		
AH11	Measures would be implemented to ensure that Aboriginal sites located outside of the construction footprint, but within 100m of it, would not be affected by construction activities	As noted above the works are within the vicinity of previously identified Aboriginal heritage sites. Nonetheless, given that no ground disturbance would be required, no additional impacts are anticipated as a result of the works. Any potential artefacts encountered within the alignment will be managed under Unexpected Heritage Finds Procedure. Prior to works commencing, a toolbox will be delivered to the workforce to communicate the location of the identified sites and outline the requirements of the Unexpected Heritage Finds Procedure.

Relevant elements of the Approved Project		Discussion
WQ3	The design and construction of the project would take into account the former NSW Office of Water's Guidelines for controlled activities on waterfront land	<p>The NSW Office of Water's Guidelines for controlled activities on waterfront land has been considered as part of the proposed works including defining the riparian corridor (RC) and the vegetated riparian zone (VRZ), minimising harm to these areas, and treating water prior to discharge.</p> <p>No vegetation clearing would be required to undertake the proposed works and water would be treated as per the environmental protection licence discharge criteria.</p> <p>Impacts on the hydrologic, hydraulic and geomorphic functions of Thompsons Creek will be minimised.</p>
SSI_10051 Conditions of Approval		
A1	<p>The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the:</p> <ul style="list-style-type: none"> (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021. 	<p>The proposed works, as described in Section 1, will be carried out in accordance with the approval and generally in accordance with the description of the:</p> <ul style="list-style-type: none"> (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	The proposed works will be carried out in accordance with all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the EIA including the documents listed in Condition A1 including the EIS and Submissions Report.
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	The location of the proposed works is covered by the approved South West Growth Centre Strategic Assessment. Impacts on MNES and Commonwealth land protected by the EPBC Act have already been assessed and approved under that strategic assessment (excluding non-certified lands such as riparian lands around Thompsons Creek). The native and exotic grasses present within the proposed works site will be managed in accordance with the PLM NSW Flora and Fauna Management Sub-Plan.

Relevant elements of the Approved Project		Discussion
		No riparian vegetation will be disturbed or cleared during the installation and operation of the discharge pipeline into Thompsons Creek, therefore the proposed works, are considered to be consistent with the approved actions listed in the South West Growth Centre approval provided by the Minister.
E8	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update). Residual impacts to KFH, following the implementation of habitat rehabilitation or other environmental compensation measures, must be offset at a ratio of 2:1 habitat offset requirement in accordance with the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update) and in consultation with DPI Fisheries.	<p>The pipeline discharge point will be directly into Thompsons Creek. The outlet will be a perforated pipe or similar which dissipates the energy from the treated water being discharged into the creek. The outlet of the pipe at Thompsons Creek will contain either an area of geo-fabric, coir blanket, or similar to protect the banks, or an attachment to the pipeline with modifications to the outlet to ensure no damage to the bed and banks of the creek. Either method will mitigate scour and erosion.</p> <p>No Key Fish Habitat will be impacted by the outlet. Groundwater collecting within the station box will be mixed and diluted with clean rainwater and treated through the WTP to remove contaminants prior to discharge to Thompsons Creek. All discharge water will meet the PLM EPL criteria.</p>
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1. Unexpected heritage finds identified by the CSSI must be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure outlined in Conditions E34 to E36. Consideration of avoidance and redesign to protect unexpected finds of state heritage significance must be addressed where this condition applies.	<p>The proposed works will require an overland lay-flat pipeline from the water treatment plant supported by a block footing at approximately 12 metre intervals to secure the pipeline. The blocks will sit on top of the ground surface and no ground disturbance is required.</p> <p>There are no known historic heritage sites along the pipeline route. The Unexpected Finds Protocol will be followed where applicable.</p>
E28	All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.	<p>An AHIMS search was undertaken February 2024 identified 17 AHIMS sites within the wider WPCA site. The location of the sites in proximity to the proposed works are indicated in Attachment 3.</p> <p>One site was identified adjacent to the pipeline area however as discussed above this site was unable to be located during detailed site survey work carried out by Extent Heritage (2021). As per the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010), where no ground disturbance is required, works can commence without any further approval required.</p>

Relevant elements of the Approved Project		Discussion
		<p>The proposed overland pipeline would not require any excavation, ground penetration or ground disturbance works, as such, additional impacts to Aboriginal heritage are not anticipated.</p> <p>Any potential artefacts encountered within the alignment will be managed under Unexpected Finds Procedure. Prior to works commencing, a toolbox will be delivered to the workforce to communicate the location of the identified sites and outline the requirements of the Unexpected Finds Procedure.</p>
E36	<p>The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction. Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits.</p> <p><i>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. Management of human remains in NSW is subject to requirements set out in the Public Health Act 2010 (NSW) and Public Health Regulation 2012 (NSW). Nothing in these conditions prevents separate procedures for the Unexpected Heritage Finds and Human Remains Procedure.</i></p>	<p>Any unexpected finds will be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure and the PLM Non-Aboriginal Heritage Management Sub-plan.</p>
E38	<p>Work must only be undertaken during the following hours:</p> <ul style="list-style-type: none"> (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays. 	<p>All construction works will be undertaken during standard construction hours, in accordance with this condition.</p> <p>Operation of the discharge pipeline will occur 24 hours a day.</p>
E99	<p>The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction</p>	<p>Baseline sampling was undertaken within the majority of the proposed works area (excluding the vegetated riparian area) as part of the Detailed Site Investigation (DSI) undertaken by CPBG. Surface soil samples collected did not report the detection of asbestos or any other contaminants.</p>

Relevant elements of the Approved Project		Discussion
		The works are not within an area of known contamination. Any unexpected finds will be managed in accordance with the Unexpected Contaminated Land and Asbestos Finds Procedure and the PLM Soil and Water Management Sub-Plan (SWMSP).

Relevant elements of the Approved Project		Discussion
E127	The Proponent must consider the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	<p>The Guidelines for controlled activities on waterfront land riparian corridors has been considered as part of the proposed works including defining the riparian corridor (RC) and the vegetated riparian zone (VRZ), minimising harm to the RC and the VRZ, and treating water prior to discharge.</p> <p>No vegetation clearing would be required to undertake the proposed activities and water would be treated as per the EPL discharge criteria.</p> <p>Impacts on the hydrologic, hydraulic and geomorphic functions of Thompsons Creek will be minimised.</p>
E128	Erosion and sediment controls must be implemented and maintained consistent with the Blue Book	<p>The proposed works are expected to have no ground disturbance.</p> <p>All works will be undertaken in accordance with the Erosion and Sediment Control Plans (ESCPs) developed for all active worksites in accordance with Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition (Landcom, 2004) (the 'Blue Book').</p> <p>The ESCPs are progressively updated to reflect current site conditions and communicated with site teams and available on site.</p> <p>The outlet of the pipe at Thompsons Creek will contain either an area of geo-fabric, coir blanket, or similar to protect the banks, or an attachment to the pipeline with modifications to the outlet to ensure disbursement of water and no damage to the bed and banks of the creek. Either method will mitigate scour and erosion.</p>

Relevant elements of the Approved Project		Discussion
E129	<p>Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed:</p> <ul style="list-style-type: none"> a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level; b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and c) for bioaccumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level. <p>Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used</p>	<p>The proposed works will not impact upon compliance with this condition as the Project operates under EPL 21807 and will be managed in accordance with the SWMSP.</p> <p>The EPL 21807 applies to the proposed works area, and all works will be undertaken in accordance with the EPL requirements.</p>
EPBC Conditions		
EPBC 2020/8687	EPBC 2020/8687 conditions	This approval does not apply to this assessment as the proposal will be undertaken outside of the area between St Marys to Elizabeth Drive.

3. Environmental review

The following table provides a risk review of the potential environmental impacts of the proposed works.

Table 3 Environmental review

Environmental review	Yes / No	Description of impacts (including consideration of safeguards required by the Approved Project)
Is the proposal to take place outside of the construction footprint of the project	Yes	The proposed works will include extending a pipeline from the construction footprint to Thompsons Creek. The works area would be approximately 230 metres in length and 2.5 metres wide, within Western Parkland City Authority (WPCA) land and will extend another 45 metres and 2.5 metres into Thompsons Creek onto an adjacent lot. The works area is shown in Figure 1.
Is the location of works within the existing EPL premise boundary	No	A portion of the proposed works will be undertaken outside the existing EPL premise boundary, as shown in Attachment 4. The EPL will be updated to include the discharge point prior to commencement.
Will the works take longer than 2 weeks to complete?	Construction – No Operation – Yes	The proposed works occur in March 2024 with installation taking approximately two days. The pipeline will remain operational during the SM-WSA construction stage, until decommissioning of the WTP in approximately December 2026, subject to ongoing landowner agreements.
Does the work require OOHW approval	No	The proposed works will be constructed during the standard construction daytime hours.
Will the works impact an EEC or threatened species	No	No clearing works will take place. No direct impacts will occur during the construction and operations of the pipeline.
Will works impact on native vegetation	No	The pipeline and footings are situated in cleared grassland from the WTP until the riparian zone of Thompsons Creek and no ground disturbance is anticipated. The pipeline will run through a section of Thompsons Creek vegetated riparian zone. No disturbance is expected to occur to any vegetation, and no ground disturbance is anticipated. No vegetation clearing is proposed.
Will the works impact on habitat trees	No	Given that the works would not require any vegetation removal, no impacts to habitat trees are anticipated.
Will clearing of non EECs or ground disturbance be of High / moderate condition vegetation. What is the area of impact?	No	No vegetation clearing would be required to undertake the proposed works.
Will the works result in medium / high noise or vibration impacts Will noise and vibration impacts on sensitive receivers be greater than that predicted in the EIA	No	The nearest sensitive receivers (residential) are approximately 110 metres from the proposed works (refer to Attachment 5). The installation of the proposed pipeline would take place during standard construction work hours over approximately two days and involve minimal construction equipment. The proposed works are located closer to the sensitive receivers than the main construction works identified in the EIS and Submissions Report, however only minimal or negligible noise or vibration impacts are anticipated during installation or operation of the pipeline. Operation and maintenance of the pipeline requires foot access only which will have negligible impact on sensitive receivers.

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Environmental review	Yes / No	Description of impacts (including consideration of safeguards required by the Approved Project)
		Any identified noise and vibration impacts will be managed in accordance with the PLM Construction Noise and Vibration Management Plan and Sydney Metro Construction Noise and Vibration Standard.
Will the works result in medium/ high air quality impacts	No	No ground disturbance would be required due to the use of the overland lay-flat pipe and spaced supporting block footings. No new or additional air quality impacts are anticipated as a result.
Will the activity be located adjacent to or in close proximity to sensitive receivers	Yes	The nearest sensitive receivers are located approximately 110 metres from the proposed works and comprise of rural residential premises. The location of the receivers is indicated in Attachment 5. Given the limited scope of the works any impacts to receivers are expected to be negligible.
Will works impact on an Aboriginal / Historic heritage site different to that predicted in the EIA	No	No Historic Heritage items are identified within the existing or extended construction footprint. An AHIMS search was undertaken in February 2024 identified 17 AHIMS in the vicinity of the extended construction footprint, the nearest is approximately 10m away from the proposed works. The location of the sites in proximity to the proposed works are indicated in Attachment 3. As discussed above AHIMS ID 45-5-2621 has been unable to be located during a detailed 2020 site investigation, and is considered to no longer be in the location described in the site card. As per the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010), where no ground disturbance is required, works can commence without any further approval required. In accordance with REMM AH11, measures are to be implemented to ensure that Aboriginal sites located outside of the construction footprint, but within 100m of it, would not be affected by construction activities. The proposed overland pipeline would not require any excavation ground penetration of disturbance works, as such, additional impacts to Aboriginal heritage are not anticipated. Any potential artefacts encountered within the alignment will be managed under Unexpected Finds Procedure. Prior to works commencing, a toolbox will be delivered to the workforce to communicate the location of the identified sites and outline the requirements of the Unexpected Finds Procedure.
Are works within 10m of a watercourse	Yes	The proposed works will be located directly adjacent to Thompsons Creek. Section 14.5 of the EIS considered the requirement for discharge to Thompsons Creek, including a reference to the performance criteria (refer to section 2). The performance criteria specified in the planning approval have been met as outlined in section 2 above.
Are works in an area of known contamination	No	No ground disturbance would be required for the proposed works due to the use of the overland lay-flat pipe and supporting block footings. Baseline sampling was undertaken by a previous Sydney Metro contractor within the majority of the proposed works area (excluding the vegetated riparian area) as part of the Detailed Site Investigation (DSI). Surface soil samples collected did not report the detection of asbestos or any other contaminants. The works are not within an area of known contamination.

Environmental review	Yes / No	Description of impacts (including consideration of safeguards required by the Approved Project)
		Where any unexpected contamination is encountered, it will be managed in accordance with the Unexpected Contaminated Land and Asbestos Finds Procedure.
Will the works result in temporary or long-term traffic impacts	No	There are no anticipated temporary or long-term traffic impacts, or additional impacts to those already identified in the approved SM-WSA EIS.
Will the works result in visual impacts to sensitive receivers	No	<p>The nearest residential receivers are approximately 110 metres from the proposed works, and further visually separated from the works by Thompsons Creek vegetation.</p> <p>Minimal or no visual impacts are anticipated due to the vegetation cover, use of a lay-flat pipeline and approximately two days only for installation works.</p> <p>No additional measures are required in addition to project CoA and REMMs and performance outcomes for the Approved Project.</p>
Will the works involve significant earthworks	No	No ground disturbance would be required for the proposed works due to the use of the overland lay-flat pipe and supporting block footings.

4. Recommendation

Based on the above assessment, and with reference to the SM-WSA EIA and Submissions Report, including the Conditions of Approval and associated CEMP and plans, it is recommended that:

✓	The proposed design/construction change is consistent with the Approved Project SM-WSA EIA and Submissions Report including the conditions of approval, has negligible impacts on the community and environment and no further assessment is required.
X	The proposed design/construction change is likely to be consistent with the Approved Project SM-WSA EIA and Submissions Report, however more than a negligible impact on the community and environment may result and further assessment in the form of a Planning Approval Consistency Assessment form is required to be completed and submitted to the Planning team for the proposed design/ construction change.
X	The proposed design/ construction change is not substantially the same as the Approved Project and is considered a radical transformation. A new planning pathway should be considered.

5. Certification

The above information provides a true and fair review of the proposed works.

Prepared by (signed):	
Date:	12/03/2024
Name:	
Position:	Environment Manager



6. Endorsement

I have reviewed the above review and provide the following endorsement:

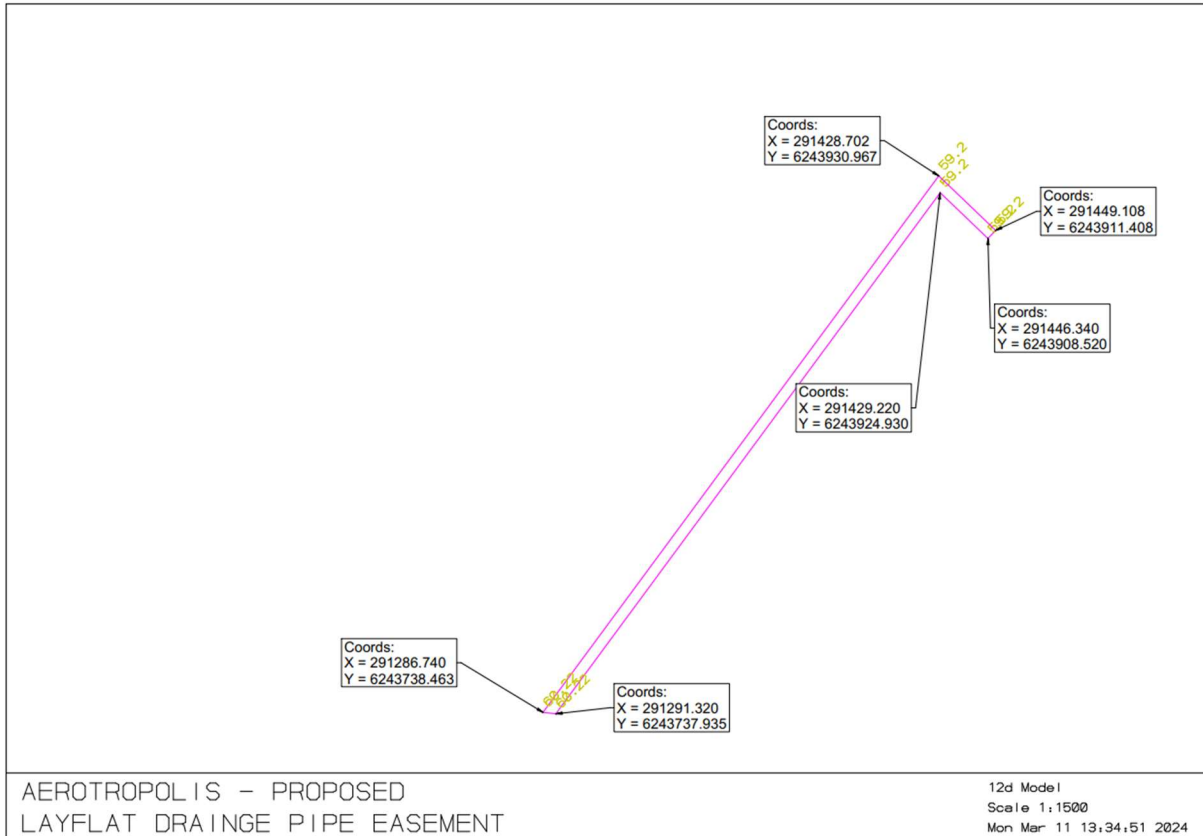
✓	The proposed design/construction change is consistent with the SM-WSA EIA and Submissions Report, has negligible impacts on the community and environment and no further assessment or modification of the planning approval is required.
	The proposed design/construction change is likely to be consistent with the SM-WSA EIA and Submissions Report, however more than negligible impacts are expected on the community and environment and further assessment is required.
	The proposed design/construction change constitutes a project modification and requires further assessment and approval.

This endorsement is conditional on the following:

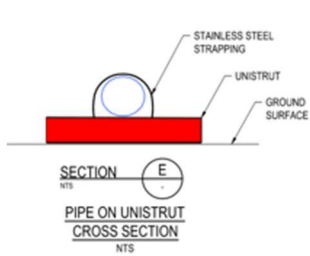
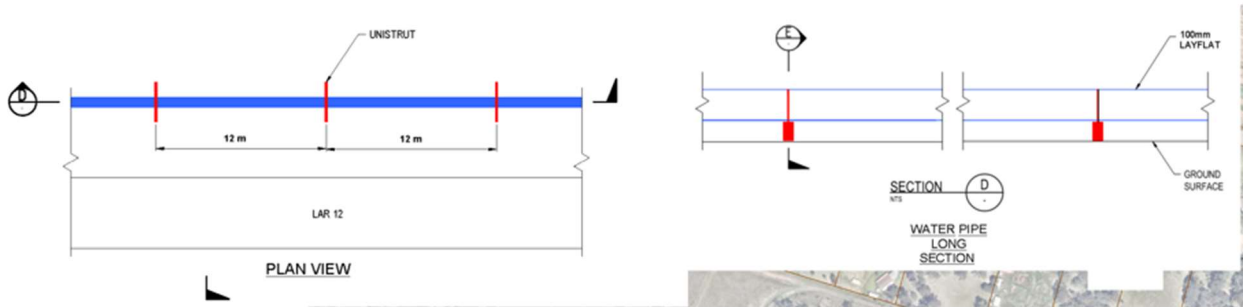
1. All works will be carried out in accordance with the SM-WSA EIA and Submissions Report and the Project Conditions of Approval.
2. All works will be carried out in accordance with the approved Construction Environmental Management Plan and any relevant sub plans.
3. All works will be carried out in accordance with any additional management measures identified in the Environmental Review, unless otherwise noted by this endorsement.

Comments (if any):	Landowner consent and an EPL update must be obtained prior to the works commencing.
Signed:	
Endorsed by:	 A/Senior Manager Planning Approvals
Date:	12.03.24

Attachment 1 – Proposed extended easement



Attachment 2 – Pipeline Design

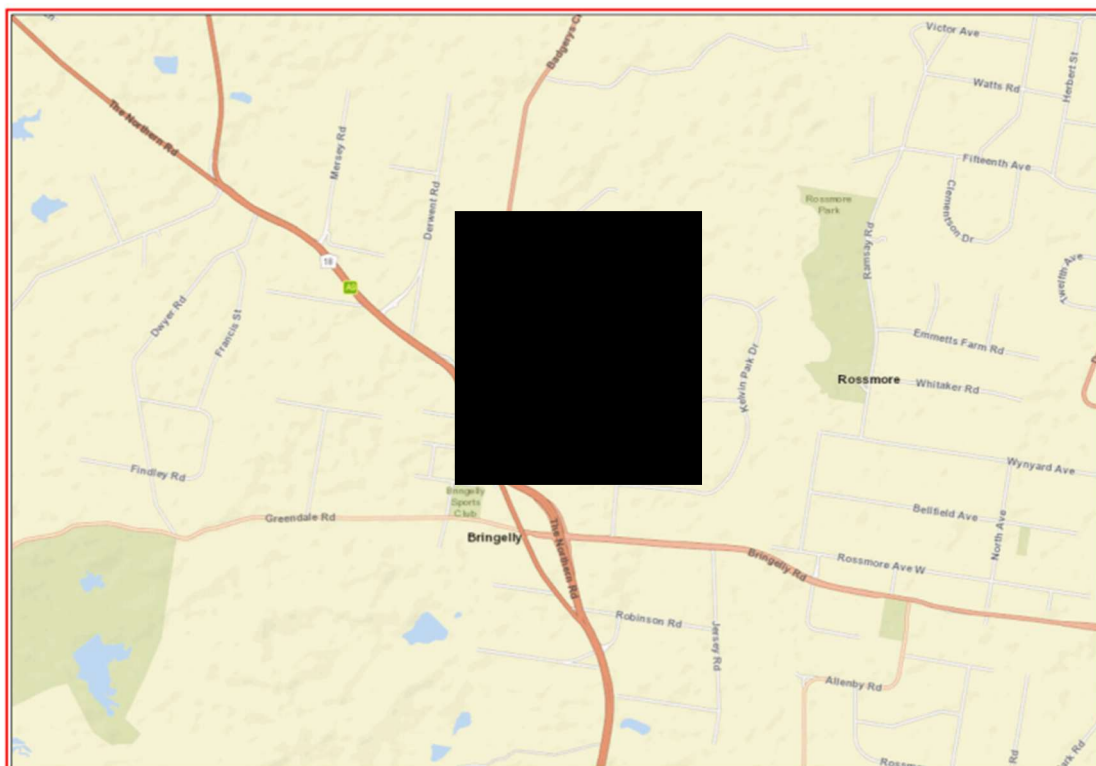


Attachment 3 – AHIMS Results and Additional Aboriginal Heritage Figures

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lot : 3101, DP:DP1282964, Section : - with a Buffer of 50 meters, conducted by [REDACTED] on 29 February 2024.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

17	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

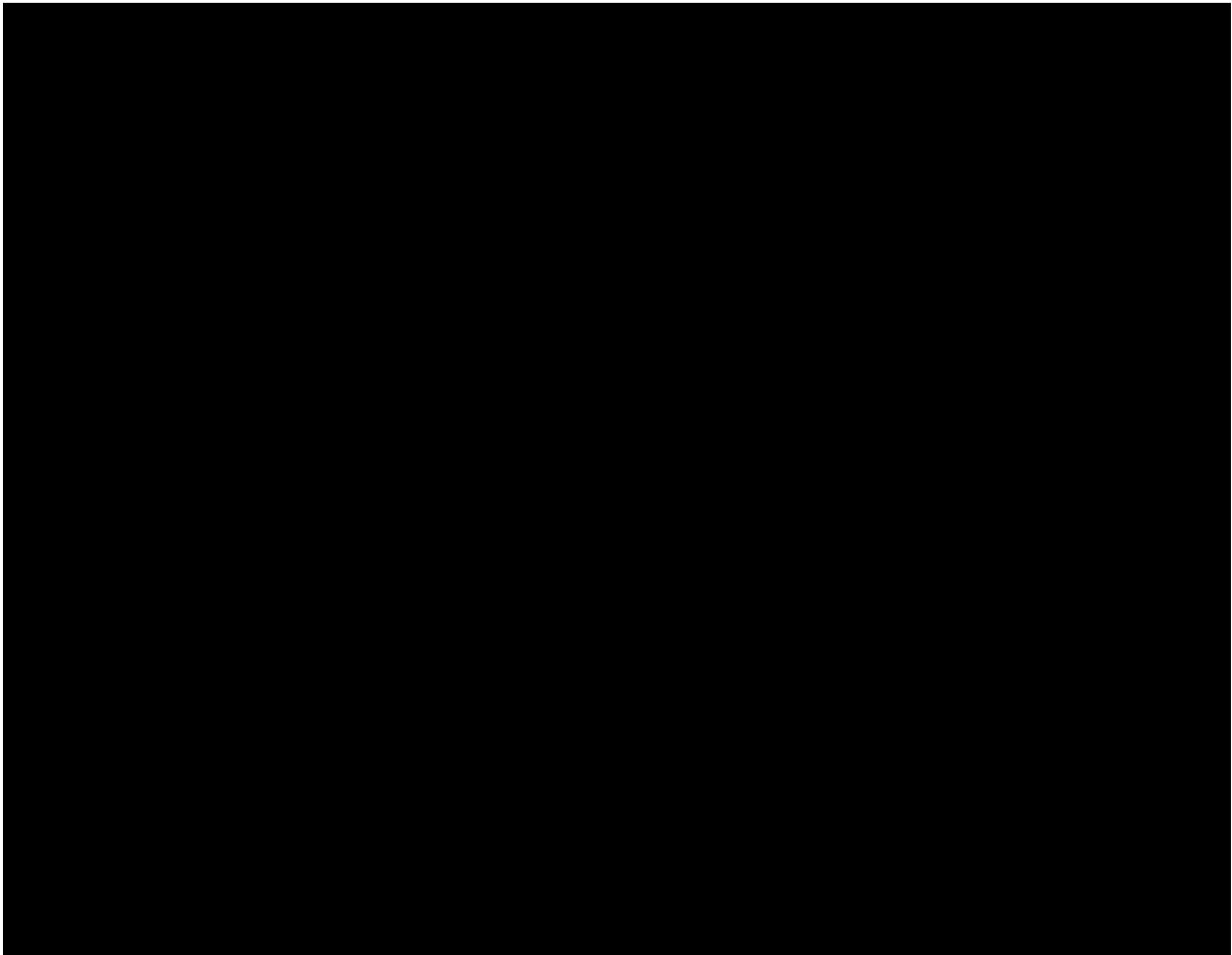


Figure 3a: Pipeline discharge route and recorded AHIMS sites

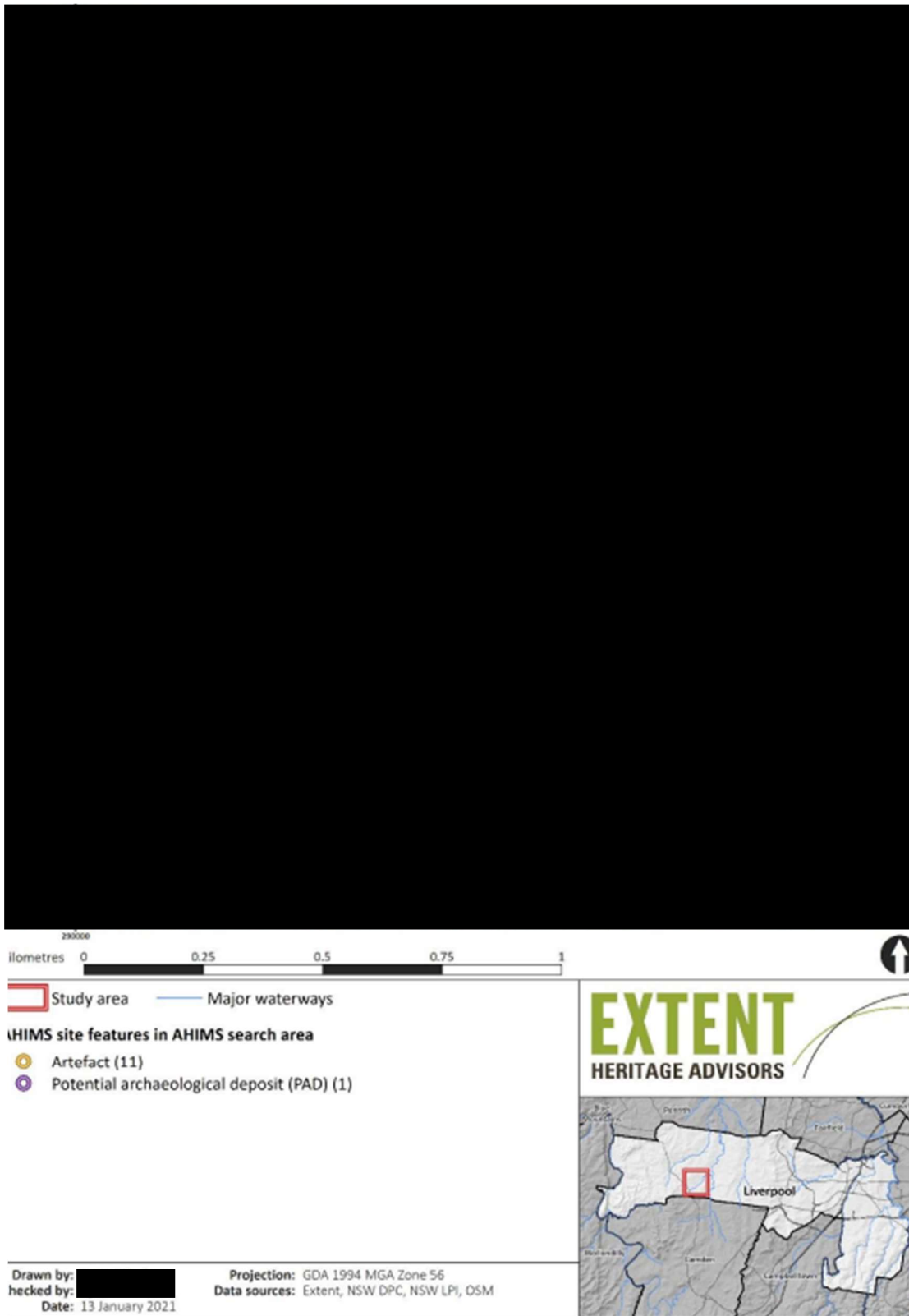
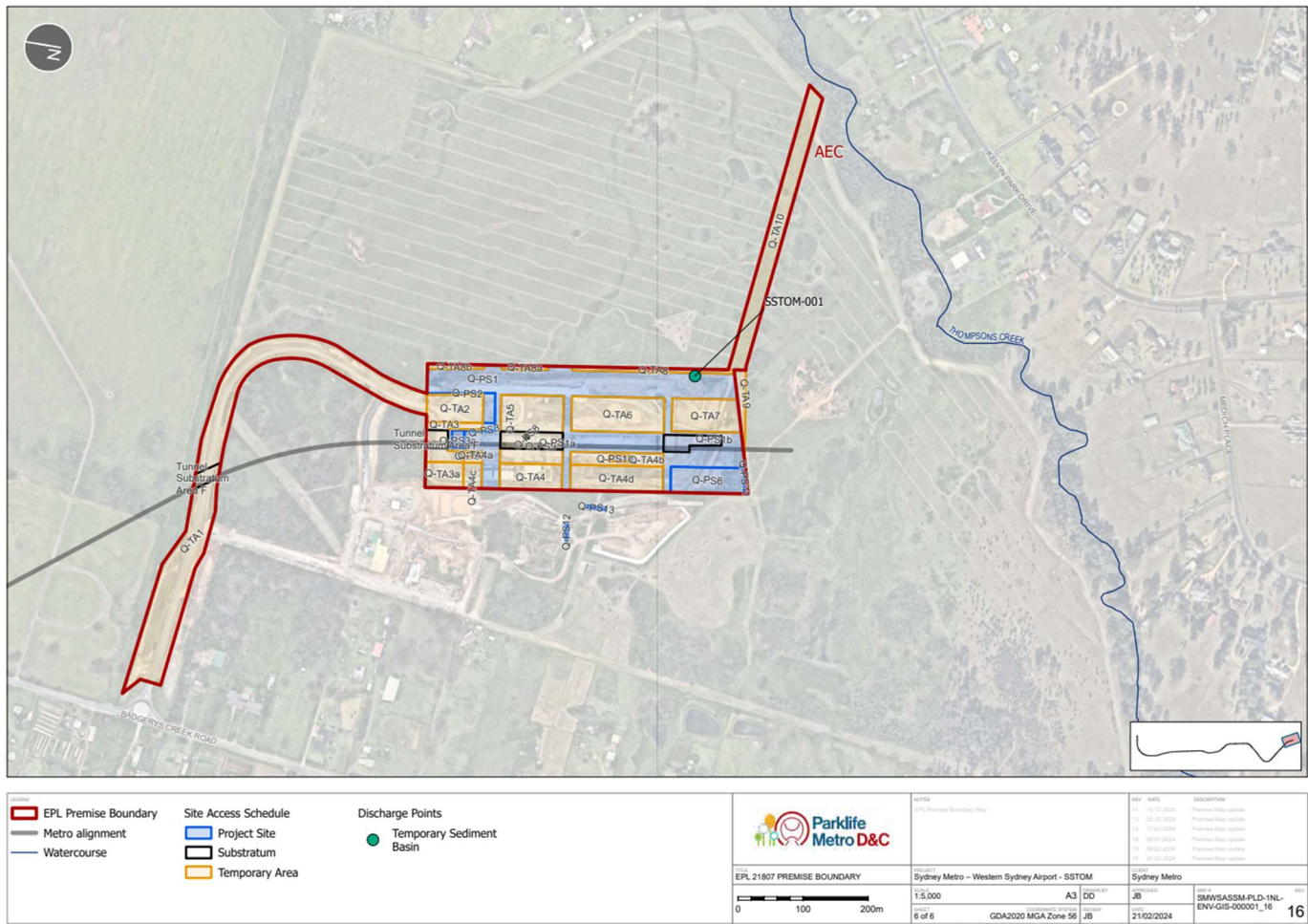


Figure 3b: Extent Heritage Western Parkland City Authority: Cultural Heritage Study (November 2021)
Study Area and recorded AHIMS sites

Attachment 4 – Current PLM SSTOM EPL Premise Map



(Premise map to be updated with EPL prior to discharge commencing)

Attachment 5 – Nearest Receivers

