

Pre-Operation Compliance Report

SSI 7485

RIC-JHC-RPT-00-EN-001-195

Project	Rozelle Interchange Project
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Glossary and Abbreviations

Abbreviation	Expanded text
CEMP	Construction Environmental Management Plan
CoA	Minister's Conditions of Approval
CSSI	Critical state significance infrastructure
DPE	Department of Planning and Environment
EIS	M4-M5 Link Environmental Impact Statement
EMS	Environmental Management System
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment.
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. The principal point of advice in relation to all questions and complaints concerning environmental performance.
Environmental target	Defined by AS/NZS ISO 14001:2015 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.
ISO 14001:2015	International Standards Organisation Environmental management systems – Requirements with guidance for use
JHCPB	John Holland CPB Contractors Joint Venture, a design and construction contractor
Minister, the	Minister of the NSW Department of Planning and Environment (or delegate)
MOC	Motorway operations complex
OEMP	Operational Environment Management Plan
POCR	Pre-Operation Compliance Report
Planning Approval	WestConnex M4-M5 Link Infrastructure Approval (SSI 7485)
Project, the	The Rozelle Interchange Project
REMM	Revised Environmental Management Measure as outlined in the SPIR
Rozelle Interchange, the	A new interchange at Lilyfield and Rozelle that will connect to the M4-M5 Link Mainline Tunnels
SSI	State Significant Infrastructure
Staging Report, the	M4-M5 Link Staging Report (March 2019)
TfNSW	Transport for NSW, the Project proponent

1. Introduction

1.1. Background

WestConnex is one of the NSW Government's key infrastructure projects which aims to ease congestion, create jobs and connect communities. Together with the other components of the WestConnex program of works and the proposed future Sydney Gateway, the WestConnex will facilitate improved connections between western Sydney, Sydney Airport and Port Botany and south and south-western Sydney, as well as better connectivity between the important economic centres along Sydney's Global Economic Corridor and local communities (Figure 1). Due to its importance, the WestConnex M4-M5 Link project was declared to be critical state significant infrastructure (CSSI) by the Minister for Planning on 15 August 2017.

The WestConnex M4-M5 Link project received Infrastructure Approval from the Minister for Planning under Section 5.19 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 17 April 2018 (SSI 7485), subject to the conditions provided in the Infrastructure Approval. The Infrastructure Approval was subsequently modified under Section 5.25 of the EP&A Act between February 2019 and August 2023 (seven modifications).

The WestConnex M4-M5 Link project is being delivered in three stages:

- Stage 1, the Mainline Tunnels which includes the construction and operation of the M4-M5 Link Tunnel between the New M4 at Haberfield and the New M5 at St Peters, and
- Stage 2, the Rozelle Interchange (RIC, the Project), which will connect the Stage 1 mainline tunnels to the surrounding surface road network and includes the construction and operation of:
 - An interchange at Lilyfield and Rozelle,
 - A tunnel connection between the Anzac Bridge and Victoria Road, east of Iron Cove Bridge,

And construction of a connection to the future Western Harbour Tunnel

- Stage 3, preparation of the Pedestrian and Cycle Implementation Strategy required by Condition E60.

The Project proponent, Transport for NSW (TfNSW), engaged John Holland CPB Contractors Joint Venture (JHCPB) on 14 December 2018 to design and construct the RIC (the subject of this report).

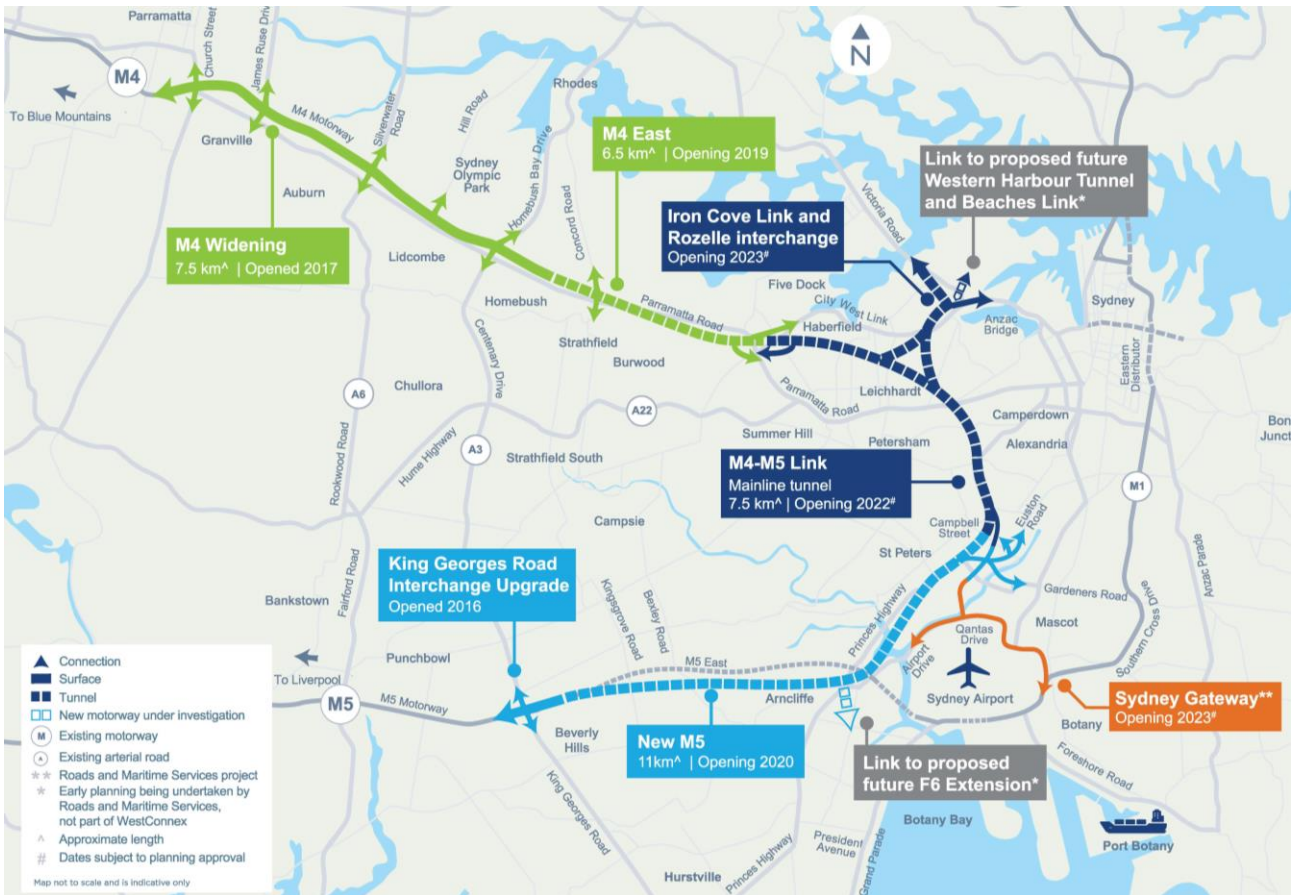


Figure 1 Overview of WestConnex M4-M5 Link and related projects

1.2. Purpose of this report

This Pre-Operation Compliance Report (POCR) has been prepared by JHCPB to satisfy Conditions A34 and A35 of the Infrastructure Approval. Relevant conditions are detailed in Table 1, including a description of how each condition is addressed in this report.

Table 1 – POCR Conditions of Approval

CoA	Requirement	How addressed
A34	A Pre-Operation Compliance Report must be prepared and submitted to the Secretary for information no later than one (1) month prior to the commencement of operation. The Pre-Operation Compliance Report must include:	This Report will be submitted to the Secretary of the Department of Planning and Environment (DPE) for information at least one month prior to the commencement of operation of the Project.
	(a) details of how the terms of this approval that must be addressed before the commencement of operation have been complied with; and	A compliance assessment is provided in Error! Reference source not found..
	(b) the commencement date for operation.	Operation of the Project is scheduled to commence on 17 November 2023.
A35	Operation must not commence until the Pre-Operation Compliance Report has been submitted for information to the Secretary.	This Report will be submitted to the Secretary for information at least one month prior to the commencement of operation of the Project.

1.3. Previous report actions

A Construction Compliance Report was prepared for the reporting period August 2022 to February 2023 (RIC-JHC-RPT-00-EN-001-182). Actions arising from the Independent Annual Audit conducted between 10 July and 18 July 2023 are detailed in the Construction Compliance Report, including actions undertaken and the completion date. There were no additional actions identified in the Construction Compliance Report (February 2023 to August 2023).

2. Project description

The Project involves the design and construction of the WestConnex M4-M5 Link Rozelle Interchange, which will connect the WestConnex M4-M5 Link Mainline Tunnels to the surrounding surface road network. It is located east of the Sydney CBD and crosses the suburbs of Annandale, Leichhardt, Lilyfield and Rozelle. The Project is generally located within the City of Sydney and Inner West Council local government areas (LGAs). An overview of the Project is shown in Figure 2.

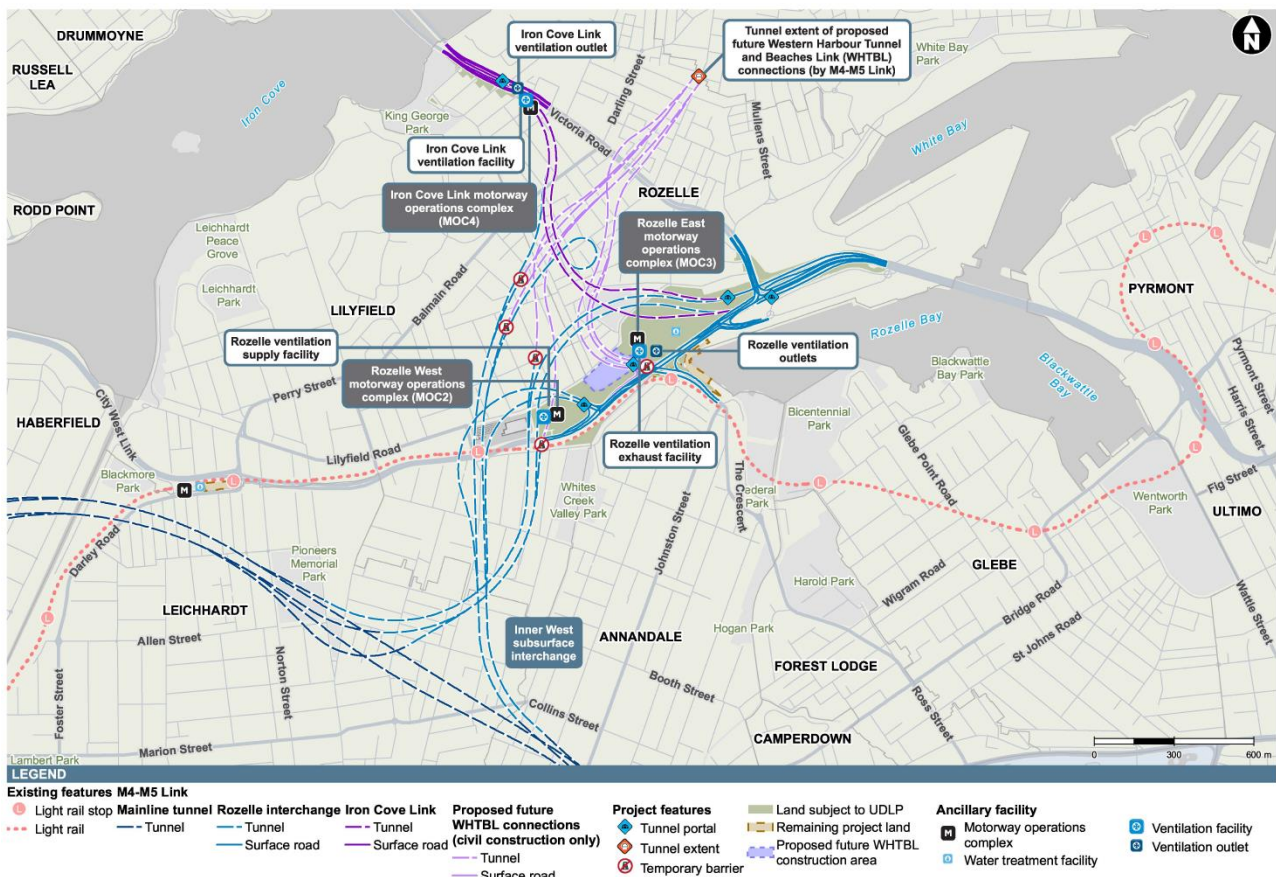


Figure 2 Overview of the Rozelle Interchange Project

The Project includes the design and construction of:

- A new interchange at Lilyfield and Rozelle (the Rozelle interchange) that will connect the M4-M5 Link mainline tunnels with:
 - City West Link
 - Anzac Bridge
 - The Iron Cove Link (see below)
 - The proposed future Western Harbour Tunnel and Beaches Link
- The Iron Cove Link, twin tunnels that will connect Victoria Road near the eastern abutment of Iron Cove Bridge and Anzac Bridge, with underground entry and exit ramps that will also provide a tunnel connection to the M4-M5 Link
- Rozelle surface works, including:
 - Realigning The Crescent at Annandale, including a new bridge over Whites Creek and modifications to the intersection with City West Link

- A new intersection on City West Link around 300 metres west of the realigned position of The Crescent, which will provide a connection to the M4-M5 Link mainline tunnels
- Reconstructing the intersection of The Crescent and Victoria Road at Rozelle
- The Iron Cove Link surface works, including:
 - Dive structures and tunnel portals between the westbound and eastbound Victoria Road carriageways, to connect Victoria Road east of Iron Cove Bridge with the Iron Cove Link
 - Realignment of Victoria Road and intersection modifications between Springside Street and the eastern abutment of Iron Cove Bridge
 - Tunnel ventilation systems, including ventilation supply and exhaust facilities, ventilation tunnels and two ventilation outlets and facilities at Rozelle Rail Yards and Iron Cove Link western portal
 - Three motorway operations complexes (MOCs): Rozelle West (MOC2), Rozelle East (MOC3) and the Iron Cove Link (MOC4)
 - Landscaping and pedestrian and cycle infrastructure, including the provision of new open space within the Rozelle Rail Yards
 - Construction of connections to the future Western Harbour Tunnel and proposed Beaches Link project as part of the Rozelle interchange
 - Utility treatments including protection and/or adjustment of existing utilities, removal of redundant utilities and installation of new utilities
 - Temporary construction facilities and temporary works to facilitate the construction of the Project.

2.1. Project delivery

Design and construction of the Project began in 2019 with operation of the Rozelle Interchange scheduled to commence on 17 November 2023. An overview of the milestones between construction commencement and completion are as follows:

- Construction commenced in August 2019
- Tunnel excavation commenced in January 2020
- Mechanical and electrical fit-out commenced in mid-2020
- Testing and commissioning commenced in 2022
- Rozelle Interchange opening is scheduled to occur before 31 December 2023

Construction of Rozelle connections to the future Western Harbour Tunnel will continue in 2024 in accordance with the DPE approved Construction Environmental Management Plan (CEMP), Sub-plans and monitoring programs.

2.2. Environmental management system

The environmental management system (EMS) is the primary system to manage and control the environmental aspects of the Project during pre-construction and construction. It also provides the overall framework for the system and procedures to ensure environmental impacts are minimised and legislative requirements are fulfilled.

The JHCPB EMS is based on the John Holland EMS, which was adapted to address project requirements and joint venture requirements.

The CEMP is the key document of the EMS. The strategies defined in the CEMP have been developed with consideration of the Infrastructure Approval and the Revised Environmental Management Measures (REMMs) presented in the M4-M5 Link Submissions Report. The CEMP establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment and community.

Roles and responsibilities for implementation of the EMS and achieving environmental compliance are detailed in the CEMP.

3. Compliance Assessment

3.1. Methodology

An assessment of compliance has been undertaken by the Project of each condition of the Infrastructure Approval that must be addressed before the commencement of operation. The status of each applicable compliance requirement has been recorded in **Error! Reference source not found.** by using the relevant descriptors detailed in Table 2.

Table 2 – Assessment criteria for compliance

Status	Description
Compliant	Sufficient verifiable evidence has been collected to demonstrate that all elements of the requirement have been complied with. A requirement is noted as 'open' where one or more elements have an activation or timing requirement that has not been met at the phase of the development when the compliance assessment is undertaken. Compliance is demonstrated against all triggered elements of the requirement.
Non-compliant	A non-compliance has been identified with one or more elements of the requirement.
Not triggered	A requirement has an activation or timing requirement that has not been met at the phase of the development when the compliance assessment is undertaken, therefore an assessment of compliance is not relevant.

3.2. Pre-Operation Compliance Summary

Compliance activities, including inspections, observations and monitoring have been undertaken in accordance with the CEMP for the duration of the Project, including:

- In excess of 1,000 formal inspections of environmental controls to ensure ongoing suitability and effectiveness; all actions have been appropriately closed
- Environmental monitoring to assess compliance with construction benchmarks, confirm compliance with the Infrastructure Approval, licences and laws, and provide an early indication of potential adverse impacts to the environment or community
- Pre-construction and construction compliance reports in accordance with the Infrastructure Approval
- Independent environmental audits and internal audits to assess compliance with systems and the Infrastructure Approval.

Reflecting the maturity of the environmental controls and compliance systems, this POCR has determined that the Project is compliant with all relevant conditions of the Infrastructure Approval. The detailed compliance assessment is provided in **Error! Reference source not found.**

4. Incidents and complaints

4.1. Incidents

There were no environmental incidents, as defined by Condition A40, that occurred between 16 February 2023 and the date of this report. Refer to relevant Construction Compliance Reports for details of incidents that occurred prior to 15 February 2023.

4.2. Complaints

A total of 365 complaints were received between 16 February 2023 and 31 August 2023. All complaints were investigated and corrective actions identified and implemented. Refer to relevant Construction Compliance Reports for details of complaints that were received by the Project prior to 15 February 2023.

Table 3 – Complaints by issue

Issue	Number of complaints
Trucks (dangerous driving and behaviour)	11
Traffic detour and delays	11
Worker behaviour (general)	14
Worker behaviour (noise)	8
Worker behaviour (parking)	60
Noise	62
Vibration	8
Dust	9
Parking availability	46
Pedestrian and cyclist (safety)	8
Signage	83
Property damage (vehicle)	5
Safety	6
Other	34

Table 4 – Complaints by location

Location	Number of complaints
Victoria Road East	17
Tunnel Site C	1
Iron Cove Link	23
City West Link	117
Rozelle Rail Yards	34
General Project	147

Location	Number of complaints
Not Project related	12
Other	14