

HEALTH INFRASTRUCTURE

Independent Audit – Proponent review and response

SSD-9838218 Griffith Base Hospital

6 March 2023

Declaration

This Proponent review and response has been prepared for NSW Health Infrastructure (HI) in response to an Independent Audit, including the recommendations and opportunities for improvement identified in the final Audit Report. The response to each of the audit findings is included as outlined in the *Independent Audit Post Approval Requirements (May 2020)*.

Declaration	
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Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
Draft	20 Feb 2023	Christian Weitz	Independent Audit – Proponent review and response	Arjuna Thiru Moorthy	
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Contents

Declaration.....	2
Document Management, Tracking and Revision History	2
Contents.....	2
1. Introduction	3
1.1 Project Application Number and Project Name	3
1.2 Site Address	3
1.3 Project Contact Details	3
1.4 Independent Auditor	3
1.5 Independent Audit Date	3
2. Proponent response.....	4

1. Introduction

1.1 Project Application Number and Project Name

SSD-9838218 Griffith Base Hospital Redevelopment

1.2 Site Address

Griffith Base Hospital, 1 Noorebar Ave, Griffith NSW 2680

Lot 2 DP 1043580

1.3 Project Contact Details

Proponent	NSW Health Infrastructure
Client Representative	Turner and Townsend
Contractor	ADCO Constructions

1.4 Independent Auditor

NGH Pty Ltd

1.5 Independent Audit Date

1 July 2022

2. Proponent response

The Independent Audit Report prepared by Will Weir, from NGH dated 30 November 2022 but received on 23 December 2022 for an audit site inspection completed on 1 July 2022. The audit report has been reviewed and the response to the audit findings are listed in the below table.

In relation to non-compliances, the response sets out the action and the completion timing. In relation to observations and opportunities identified for improvement, the actions are also set out or the reason for not implementing any measures in response.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
A2	<p>Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent;</p>		<p>A number of non-compliant findings have been recorded with regard to the content and/or timing of submission of reporting deliverable. Not all required documents are provided on the project website.</p> <p><u>Recommendation</u> Address relevant non-compliant conditions.</p>	Non-compliant	NC1	Adressed individually as below
A6	<p>Prescribed Conditions The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.</p>		Refer above	Non-compliant	NC2	Refer above
A8	<p>Evidence of Consultation Where conditions of this consent require consultation with an identified party, the Applicant must: (a)consult with the relevant party prior to submitting the subject document for information or approval; and (b)provide details of the consultation undertaken including: (i)the outcome of that consultation, matters resolved and unresolved; and (ii)details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>		Refer condition B5 (a)	Non-compliant	NC3	Refer condition B5 (a)
A9	<p>Staging The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).</p>		<p>Construction - demolition works were commenced 11 April 2022. The first Staging Report Rev No. V0 is dated 26 April and as such did not meet the requirement to submit one month prior to the commencement of construction.</p> <p>The current Staging Report, Rev No. V3 has been approved by the Planning Secretary.</p> <p><u>Recommendation</u> No further action required</p>	Non-compliant	NC4	<p>Non-compliance submitted (SSD-9838218-PA-16).</p> <p>Some demotilion was covered under a Part 5 approval and site establishment works.</p> <p>Commencent of construction (demolition) under SSD-9838218 was on 4 May 2022.</p> <p>A review of project administration is underway to improve understanding, monitoring and compliance with Conditions of Consent.</p>

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						<p>Monthly meetings being held with HI Planning and Project Team (PM and Constructor) to monitor compliance and ensure quality of documents.</p> <p>More specifically, monthly Audit (IEA) meetings will be held to ensure that conditions of consent are satisfied and complied with.</p> <p>HI Project Director to attend all IEA meetings to ensure project is complying with conditions and providing appropriate evidence.</p>
A12	<p>Staging</p> <p>Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.</p>		<p>The Staging Report indicated that Stage 1 was to commence in May 2022.</p> <p>Construction commenced on 11 April 2022.</p> <p><u>Recommendation</u></p> <p>No further action required</p>	Non-compliant	NC5	<p>Non-compliance submitted (SSD-9838218-PA-16)</p> <p>Staging Plan V1 was submitted to DPE 27/4/22 (SSD-9838218-PA-3) – rejected & RFIs. Approved 16/6/22</p> <p>Commencement of demolition under SSD-9838218 commenced 4 May 2022.</p>
A23	<p>Access to Information</p> <p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>i) the documents referred to in condition A2 of this consent;</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p>		<p>The Environmental Management Plan and associated sub-plans were not posted on the website at the time of the audit.</p> <p>No reporting of environmental performance found on website at the time of the audit.</p> <p>No comprehensive summary of monitoring results on the website at the time of the audit.</p> <p><u>Recommendation</u></p> <p>Ensure or requisite reports and information are provided on the Project’s website.</p>	Non-compliant	NC6	<p>Completed.</p> <p>These documents are on the Griffith Base Hospital Redevelopment website.</p>

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
	<p>iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p>					
A24	<p>Compliance</p> <p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>		<p>The site induction material reviewed does not specifically single out the conditions of consent and does not provide detail on higher risk environmental management requirements.</p> <p><u>Recommendation</u> Update site induction materials to ensure requisite aspects are covered.</p>	Non-compliant	NC7	<p>Completed</p> <p>Site induction procedures have been updated. This information is available if required.</p>
B1	<p>Notification of Commencement</p> <p>The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.</p>		<p>No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of construction.</p> <p><u>Recommendation</u> No further action required</p>	Non-compliant	NC8	<p>Non-compliance submitted (SSD-9838218-PA-16)</p> <p>Notification of commencement sent prior to commencement of <i>construction</i> on 23 June 2022 but after commencement of <i>demolition</i> on 4 May 2022.</p>
B2	<p>Notification of Commencement</p> <p>If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.</p>		<p>No audit evidence provided for notification of the commencement of Stage 1.</p> <p><u>Recommendation</u> Ensure notification is undertaken for future stages of the development.</p>	Non-compliant	NC9	<p>As above.</p> <p>On 20 June 2022 HI notified DPE formally that commencement of works will begin 23 June 2023. DPE acknowledgement of this notification was provided to HI on 21 June 2023.</p>
B5	<p>Dilapidation Report</p> <p>a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure</p>		<p>No audit evidence provided for review.</p> <p><u>Recommendation</u> Ensure all requisite consultation is undertaken and documented.</p>	Non-compliant	NC10	<p>Non-compliance submitted (SSD-9838218-PA-16)</p> <p>Letters to neighbours (including St Vincent's Private Community Hospital) put in their letter boxes on 11 April 2022</p>

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
						Council consulted prior to 28 April 2022
B9	<p>Ecologically Sustainable Development</p> <p>Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate to the Certifier that ESD initiatives recommended by the ESD Report (Griffith Base Hospital Redevelopment ESD Report, prepared by LCI, dated 22/12/2020) have been incorporated into the design of the development.</p>		<p>Not provided to Certifier prior to commencement of construction.</p> <p><u>Recommendation</u> No further action required.</p>	Non-compliant	NC11	<p>Non-compliance submitted (SSD-9838218-PA-16)</p> <p>Document submitted to Certifier on 20 April 2022 (ADCO Con-GCOR-000327) prior to the commencement of demolition on 4 May 2022.</p>
B10	<p>Ecologically Sustainable Development</p> <p>The project is to achieve compliance with section 2.5.6 of the Health Infrastructure Engineering Services Guidelines dated 06 August 2021 (including Design Guidance Note No. 058) by attaining a minimum of 45 points in accordance with the ESD Evaluation Tool.</p>		<p>Not provided to certifier prior to commencement of construction</p>	Non-compliant	NC12	<p>As per Condiiton A9 non-compliance above.</p> <p>Document submitted to Certifier on 20 April 2022 (ADCO Con-GCOR-000327) prior to the commencement of demolition on 4 May 2022.</p>
B11	<p>Heritage – Interpretation Strategy</p> <p>Prior to the commencement of construction, an Interpretation Strategy and Plan must be developed to ensure that all historic information about the establishment and use of the hospital is maintained and presented to the public. Original joinery c 1931- 36 (multi-paned windows, French doors, architrave and trims) must be salvaged and reused in other historic Council buildings or sold for reuse in local restoration projects. There are a number of moveable heritage items which must be retained and used in an interpretive display or reinstated in an appropriate place within the new hospital. These items are:</p>		<p>The Interpretation Plan addresses Condition B11, but was not prepared and submitted prior to the commencement of construction.</p> <p><u>Recommendation</u> No further action required.</p>	Non-compliant	NC13	<p>As above</p> <p>Interpretation Plan submitted to Certifier on 26 April 2022 (ADCO Con-GCOR-000372) prior to the commencement of demolition on 4 May 2022.</p>
B14	<p>Demolition</p> <p>Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of</p>		<p>As the documents are not date stamped it is not clear if these were prepared and submitted to the Certifier and Planning Secretary prior to commencement of construction. The Cover Letter recorded in the DPIE Submission Receipt was not provided for review.</p> <p><u>Recommendation</u></p>	Non-compliant	NC14	<p>Documents submitted to Certifier on 2 May 2022 (ADCO Con-GCOR-000443) prior to the commencement of demolition on 4 May 2022.</p> <p>Documents submitted as Appendix in Staging Plan submission (SSD-9838218-PA-3)</p>

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	compliance must be submitted to the Certifier and Planning Secretary.		No further action required.			
B16	<p>Construction Environmental Management Plan Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:</p> <p>a) Details of: ii) 24-hour contact details of site manager; vi) groundwater management plan including measures to prevent groundwater contamination; vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p>		<p>Principal Contractor Details include company head office number only. The 24 hour 1800 contact number is provided on the site signage. Spill management is addressed, however no specific groundwater management plan included.</p> <p><u>Recommendation</u> Update the EMP to include all requisite aspects.</p>	Non-compliant	NC15	Completed CEMP Rev 3 includes this information and published on the Griffith Base Hospital Redevelopment website
B17	<p>Construction Environmental Management Plan The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: b) be prepared in consultation with Council and TfNSW;</p>		<p>No evidence of consultation with TfNSW or Council provided or discussed in CTMP.</p> <p><u>Recommendation</u> Ensure all requisite consultation has been undertaken and documented.</p>	Non-compliant	NC16	Completed CEMP Rev 3 includes this information and published on the Griffith Base Hospital Redevelopment website
B18	<p>Construction Environmental Management Plan The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B18(d);</p>		<p>The CNVMP and specifically Section 7.3 provides strategies for community consultation and complaint management. It does not include strategies that have been developed with the community for managing high noise generating works.</p> <p>The CNVMP does not describe any consultation undertaken with the community.</p> <p><u>Recommendation</u> Ensure community consultation is undertaken and update the CNVMP with the requisite information.</p>	Non-compliant	NC17	Completed CNVMP Rev 4 includes this information & published on the Griffith Base Hospital Redevelopment website
B27	<p>Interpretation Strategy – Aboriginal Heritage Prior to the commencement of construction, the Applicant must submit to the Planning Secretary a</p>		The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post	Non-compliant	NC18	Heritage Interpretation Plan will be provided to the Independent Auditor at the next audit.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
	Heritage Interpretation Strategy and Plan for the archaeology and Aboriginal history of the site. The plan must be prepared by a suitably qualified and experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.		<p>Approval receipt it referred to by DPE as a Heritage Interpretation Plan.</p> <p>The Heritage Interpretation Strategy report states that “Interpretation is a 3-stage process, beginning with the strategy”, then recommending a Heritage Interpretation Plan be prepared. This latter proposed document was not provided for audit review.</p> <p>The Griffith Base Hospital - Interpretation Plan applies only to built heritage as applicable to condition B11.</p> <p>It is not clear if an Aboriginal Heritage Interpretation Plan has been prepared and approved for the development. This was not sighted by the auditor.</p> <p><u>Recommendation</u> Clarify if a Heritage Interpretation Plan is required for Aboriginal Heritage. If so, prepare plan.</p>			
B28	Biodiversity Prior to the commencement of construction, the number and classes of ecosystem credits and species credits (like-for-like) set out in the tables below must be retired.		<p>Payment receipted after commencement of construction.</p> <p><u>Recommendation</u> No further action required.</p>	Non-compliant	NC19	Completed Payment receipted prior to commencement of construction on 23 Jun 2023.
B35	Site Contamination Prior to the commencement of construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.		<p>Site auditor engaged after commencement of construction</p> <p><u>Recommendation</u> No further action required.</p>	Non-compliant	NC20	Compliant Site auditor engaged prior to commencement of demolition on 4 May 2022. (refer attachment NC20).
C1	Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements: c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the		<p>The signage does not include the approved hours of work.</p> <p><u>Recommendation</u> Update the site signage to include approved hours of work.</p>	Non-compliant	NC21	Completed Hours of work included on site signage (refer attachment NC21).

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C25	<p>responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s);</p> <p>Stormwater Management System Prior to commencement of construction, the Applicant must design and create a stormwater management system for the development and submit it to the satisfaction of Council and the Certifier.</p>		<p>Stormwater drainage design details accepted by Certifier after commencement of construction. No evidence provided that the design was provided to Council.</p> <p><u>Recommendation</u> Ensure details are provided to Council.</p>	Non-compliant	NC22	<p>Stormwater system design accepted by Certifier prior to commencement of demolition on 4 May 2022.</p> <p>Stormwater Section 68 certificate accepted by Council prior to commencement of demolition on 4 May 2022. (refer attachment NC22).</p>