

HEALTH INFRASTRUCTURE

Independent Audit 3 – Proponent review and response

SSD-9838218 Griffith Base Hospital

12 September 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	
Author:	Stephanie Cincotta
Position:	Project Manager
Company:	Turner and Townsend Project Management Pty Ltd (ABN 89 114 595 336)
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Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
V0.2	16 August 2023	Stephanie Cincotta	Independent Audit – Proponent review and response	Kathryn Saunders	Arjuna Thiru Moorthy
V0.3	12 September 2023	Stephanie Cincotta	Independent Audit – Proponent review and response	Kathryn Saunders	Arjuna Thiru Moorthy

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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

6 July 2023

2. Proponent response

The Independent Audit Report 3 was prepared by Nicola Smith and Natasch Arens, from NGH. The Audit Report was submitted to DPE on 18 August 2023. A updated Audit Report dated 11 September 2023 was received on 11 September 2023 for an audit site inspection completed on 6 July 2023. 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.

Please note the below table contains a list of the 11 non-compliances as determined in Audit 3.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
A2	The development may only be carried out: a) in compliance with the conditions of this consent;		A number of non-compliant findings have been recorded with regard to works not in accordance with the Project CEMP and sub-plan and content and/or timing of submission of reporting deliverables.	Non-compliant	NC1	Addressed individually below.
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.		During the third audit, works were generally being delivered in accordance with the current management plans and strategies. However, there are some non-compliances with the Project CEMP and ESCP. Refer to Condition C9.	Non-compliant	NC23	Completed – rectified onsite after identification. Action – Rubbish to be placed in bins and sedimentation controls to be maintained.
B1	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.		No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of construction during the first audit. Health Infrastructure notified the Secretary on 20/6/2022 that construction, including demolition of Building 25 was intended to commence on 23/6/2022. The demolition of Building 25 was actually commenced on 4 May 2022 and completed prior to the stated commencement date. The Staging Report notes that construction was to commence in May 2022. As per the definition of "construction" provided in the SSD determination, construction is deemed to have commenced when the demolition work started. The notification letter was provided to the auditor on 5 January 2023 post completion of the first audit report.	Non-compliant	NC8	Completed previously – Correct construction commencement date notified to Planning Secretary on 14 April 2023. No further action required.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
			<p>HI renotified the DPE on 14 April 2023 of the correct commencement of construction date of 4 May 2023.</p>			
B2	<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 during the first audit. Refer above</p>	Non-compliant	NC9	<p>Completed previously – Correct construction commencement date notified to Planning Secretary on 14 April 2023.</p> <p>No further action required.</p>
B18	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <p>d) include strategies that have been developed with the community for managing high noise generating works;</p> <p>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>As of the third audit, the CNVMP Rev 004 includes a sentence about community consultation in Section 7.3 and the letter in Appendix B. However, the consultation does not show if or how community were consulted in the development of any strategies outlined in the CNVMP.</p>	Non-compliant	NC17	<p>Completed – CNVMP includes community consultation information and is published on the Griffith Base Hospital Redevelopment website.</p> <p>Action – Ensure more detailed community consultation on the CNVMP is undertaken prior to commencement of Stage 2.</p>
B22	<p>Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.</p>		<p>Adequate erosion and sediment control measure were observed by the auditor at the time of the audit. However, some of these were not being maintained. Sedimentation was observed on the public walkway along the western boundary of the Project site. Sedimentation was also observed in the gutter of Animoo Avenue, down-gradient of the site, at the time of the third audit.</p>	Non-compliant	NC27	<p>Completed – Rectified onsite after identification.</p> <p>Action – Rubbish to be placed in bins and sedimentation controls to be maintained.</p>
B27	<p>Prior to the commencement of construction, the Applicant must submit to the Planning Secretary a Heritage Interpretation Strategy and Plan for the archaeology and Aboriginal history of the site. The plan must be prepared by a suitably qualified and</p>		<p>The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post Approval receipt it referred to by DPE as a Heritage Interpretation Plan.</p>	Non-compliant	NC18	<p>Action – Prepare a Heritage Interpretation Plan.</p>

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
	experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.		<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>			
C6	<p>Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:</p> <p>(d) for the delivery, set-up and removal of construction cranes, where notice of the crane related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or</p>		<p>Community consultation notice regarding delivery and erection of tower crane to occur on 16 July 2022 between the hours of 7 am to 6 pm.</p> <p>The works notification letter to residents from ADCO is dated 14 July 2022.</p>	Non-compliant	NC28	<p>Completed – Affected residents notified 7 days prior, unaffected residents notified 48hrs prior.</p> <p>Action – Notify affected residents at least 7 days prior to the works occurring.</p>
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).		<p>In accordance with the CEMP, the site should be maintained in a clean and tidy condition at all times. The auditor observed during the third audit, the following:</p> <ul style="list-style-type: none"> • Site not maintained in a clean and tidy condition at all times (refer to photographs of site access and storage area) with materials not stockpiled in a safe manner, plastic wrap, plastic bottles, cardboard boxes not disposed of in waste management receptacles, concrete wash / spillage on the ground. 	Non-compliant	NC26	<p>Completed – Rectified onsite after identification.</p> <p>Action – Rubbish to be placed in bins and sedimentation controls to be maintained.</p>

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
			<ul style="list-style-type: none"> Sedimentation on public path adjacent to down-gradient site boundary and built up in the gutter of Animoo Avenue. 			
C30	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.		<p>Addressed in management plans.</p> <p>Waste on occasions, observed to not be contained within designated waste storage areas.</p>	Non-compliant	NC29	<p>Completed – Rectified onsite after identification.</p> <p>Action – Rubbish to be placed in bins, increase number of bins on site</p>
C43	Independent Audit Reports and the applicant/proponent’s response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.		<p>The site audit for Audit 2 was undertaken on 11 January 2023. The Audit 2 report was provided on 10 March 2023.</p> <p>The Audit 2 report and response was submitted to the Planning Secretary on 16 March 2023.</p>	Non-compliant	NC30	<p>Completed – Audit and proponent response sent to DPE.</p> <p>Action – Submit audit and proponent response within two months of date of audit site inspection.</p>