

Prepared for ADCO Construction

Independent Environmental Audit 4

Griffith Base Hospital

SSD-9838218, NSW

February 2024

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Executive summary

The Griffith Base Hospital Redevelopment involves the planning, design and delivery of a hospital designed to meet the needs of Griffith and surrounding communities both now and into the future. The project is being delivered in several phases. They include early and enabling works, and the delivery of a new multi-storey hospital as part of the main phase of works.

NGH Pty Ltd was engaged to undertake this fourth construction independent audit of the project. The first construction independent audit of the project was 1 July 2022, the second on 11 January 2023, the third on the 6 July 2023.

The objectives of the audit were to conduct an independent review of compliance with the Conditions of Approval (SSD-9838218) issued by the Minister for Planning and Public Spaces on the 14 October 2021 in accordance with the requirements of the Independent Audit Post Approval Requirements, May 2020 (DPIE 2020). The consolidated Conditions of Approval were issued following the determination of Modification 1 on 28 September 2023.

The scope of the audit was in accordance with Section 3.3 of the Independent Audit Post Approval Requirements (May 2020). The scope in general included:

- Conditions of consent applicable to the pre-construction and construction phase of the project
- All post approval documents required by the conditions of consent (e.g. Environmental management plans and sub plans)
- All environmental licences and approvals applicable to the development
- An assessment of the environmental performance of the development
- A high-level review of the project's EMS
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.

This audit found the project to be non-compliant with five (5) conditions out of a total of 169 conditions of approval.

1. Introduction

1.1. Background

The Griffith Base Hospital Redevelopment involves the planning, design and delivery of a hospital (the Project) designed to meet the needs of Griffith and surrounding communities both now and into the future. The Project is being delivered in several phases. They include early and enabling works, and the delivery of a new multi-storey hospital as part of the main phase of works. The key components include:

- Demolition of building 25
- Construction of a new four-storey Clinical Services Building
- Demolition of remaining buildings vacated after commissioning of the new hospital including the existing medical services block
- Construction of site works including roads, car parking and landscaping
- Signage.

The Project is subject to a State Significant Development (SSD-9838218). The Project approval was obtained from the then NSW Minister for Planning and Public Spaces on the 14 October 2021. The consolidated Conditions of Approval were issued following the determination of Modification 1 on 28 September 2023.

1.2. Audit team

ADCO nominated Natascha Arens as the Lead Independent Auditor for project and provided her CV and independence declaration to DPE on 26 October 2023 (refer Appendix A). Natascha was approved by DPE as the Independent Auditor on the 27 October 2023 (refer Appendix B).

The audit team comprised these members:

- Natascha Arens – Technical and QA Review, Lead Auditor
- Nicola Smith – Audit Assistant.

1.3. Objectives

The objectives of the audit were to conduct an independent review of compliance with the Conditions of Approval (SSD-9838218) issued by the Minister for Planning and Public Spaces on the 14 October 2021 in accordance with the requirements of the Independent Audit Post Approval Requirements, May 2020 (DPIE 2020). The consolidated Conditions of Approval were issued following the determination of Modification 1 on 28 September 2023.

1.3.1. Audit scope and period

The scope of the audit was in accordance with Section 3.3 of the Independent Audit Post Approval Requirements (May 2020). The scope in general included:

- Conditions of consent applicable to the pre-construction and construction phase of the project
- All post approval documents required by the conditions of consent (e.g., Environmental management plans and sub plans)
- All environmental licences and approvals applicable to the development
- An assessment of the environmental performance of the development
- A high-level assessment of whether Environmental Management Plans and Sub-plans are considered adequate for the Project.

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The audit period for the fourth audit was from the date of audit three (6 July 2023) to the date of site visit on 20 December 2023. A high-level pre-audit request for information was provided to ADCO prior to the site inspection.

2. Audit methodology

2.1. Selection of the audit team

The Department of Planning and Environment (the DPE) was notified that Natascha Arens and Nicola Smith were the proposed Independent Auditors (the audit team) for the Project. The Planning Secretary endorsed the appointment of the audit team in a letter dated 27 October 2023 (refer Appendix B). The audit team was informed subsequently engaged by ADCO to deliver the audit program.

2.2. Independent audit scope development

The audit scope was developed by reviewing the SSD-9838218 consolidated CoC and the Independent Audit Post Approval Requirements (2020).

The audit comprised of offsite document review, site inspection and onsite document review, and offsite audit analysis and reporting.

An Audit Plan with audit table was provided to the auditee prior to the site audit detailing the timing of the audit and requirements regarding accessing the site and documentation.

2.3. Compliance evaluation

The audit consisted of offsite document review, onsite document review, site inspection and interviews. Offsite document review was undertaken prior to the site component of the audit with further request for information following the site inspection. The site component of the audit included:

- Opening meeting to introduce all parties and discuss the scope and objectives of the audit
- Site inspection
- Document and records review to check compliance with conditions
- Interviews with staff including construction site personnel
- Closing meeting to summarise the findings of the site audit and to discuss additional audit evidence required.

The document review included a review of the consolidated Conditions of Consent relevant to the stage of works of the Project and all environmental management plans and sub plans.

An opening meeting was held on 20 December 2023 at 9.50 am.

Present at the opening meeting were:

- Andrew Galvin (ADCO Senior Project Engineer)
- Stephanie Cincotta (Turner and Townsend Project Manager)
- Nicola Smith (NGH Auditor).

Document review occurred throughout the day and offsite until report completion.

2.4. Site interviews

Interviews with staff were undertaken throughout the course of the site audit to gather evidence during offsite document review including:

- Andrew Galvin (ADCO Senior Project Engineer)
- Stephanie Cincotta (Turner and Townsend Project Manager)

- John Allen (ADCO Site Manager).

2.5. Site inspections

A site inspection was undertaken at 9.55 am on the 20 December 2023. The inspection viewed the entire site including exit and entry points, emergency assembly areas and nurse call stations, active areas of the construction site, erosion and sediment controls, notice boards and spill response kits.

Photos of the inspection are provided in Appendix C and presented in the audit findings below.

2.6. Consultation

Consultation was undertaken with all levels of the project team including those listed in Section 2.4.

An email was sent to NSW DPE and Griffith City Council regarding the audit scope. A copy of the correspondence is provided in Appendix D.

2.7. Compliance status descriptors

The compliance status descriptors from the Independent Audit Post Approval Requirements (DPIE 2020) have been used to assess compliance, refer Table 2-1.

Table 2-1 Compliance status descriptors

Status	Description
Compliant (C)	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant (NC)	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered (NT)	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Conditions that have incurred a non-compliant status relevant to the pre-construction phase would retain their noncompliance status for the remainder of the audit program. However, such conditions generally will not be discussed further as they are considered closed with no further management action required. Refer to Section 3.5.1.

In the event that conditions that have incurred a non-compliant status relevant to the pre-construction phase, which still require management attention to close out the recommendation are discussed below to assist ADCO in tracking such actions through to close out. Refer to Section 3.4.

3. Audit findings

3.1. Approval and documents list

Additional documents reviewed for this fourth audit are underlined.

Design plans and approval documentation

- Development Consent SD-9838218
- Environmental Impact Statement – Griffith Base Hospital Redevelopment (Urbis 15 April 2021)
- Modification Report 1 – Griffith Base Hospital Redevelopment (Urbis 22 August 2023)
- Amended Modification Report – Griffith Base Hospital Redevelopment (Urbis 21 September 2023)
- Consolidated Development Consent SD-9838218 (Mod 1).

Correspondence

- Appointment of Experts - Griffith Base Hospital Redevelopment (SSD 9838218) Independent Auditors, 11/05/2022
- Appointment of Experts - Griffith Base Hospital Redevelopment (SSD 9838218) Independent Auditors, 26/06/2023
- ADCO Letter dated 26 April 2022, LETTER OF INTENT -SITE ENVIRONMENTAL AUDITS
- Approval of Plan SSD-9838218-PA-3, 16/06/2022
- Aconex mail - E-Lab consulting, 20 May 2022 (NVMP)
- Correspondence from E-LAB Consulting dated 23 May 2022 (NVMP)
- DPIE submission receipt - SSD-9828218-PA-8 (undated) (Demolition)
- DPIE Letter - Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2)
- Letter dated 24/11/2021 - Griffith Base Hospital Redevelopment (SSD 9838218) Expert Appointment Endorsement - Condition B26(a) (ref: SSD 9838218)
- DPIE Letter dated 24/08/2022 - Griffith Base Hospital Redevelopment (SSD-9838218) Aboriginal Heritage Interpretation Strategy, Condition B27
- DPE Letter dated 02 February 2023 approving EMP and Sub-plans.
- Letter to DPE - notifying commencement of construction, Health Infrastructure, dated 20 June 20/6/2022
- Letter to DPE – renotifying commencement of construction, Health Infrastructure, dated 14 April 2023
- Application under Section 68 of the Local Government Act at 35 NOOREBAR AVENUE GRIFFITH 2680, dated 28 April 2022
- Section 68 Approval No.: 10/2023(1), Carry out water supply, sewerage & stormwater works, dated 7 March 2023
- Response to Independent Audit 1 on SSDA Conditions Compliance (ADCO)
- Response to Independent Audit 2 on SSDA Conditions Compliance (ADCO)
- Email from asBuilt Digital regarding the brief spikes in the reported noise data for March and April 2023, dated 8 May 2023.
- Griffith Base Hospital Redevelopment Works Notification for Installation of tower crane from 16 July 2022, from HI, dated July 2022.
- Letter to DPE – SSD-9838218 – Griffith Base Hospital Redevelopment Condition B4 – External Walls and Cladding, Health Infrastructure, dated 5 April 2023
- Correspondence from ADCO to CBRE regarding statement of compliance of materials with condition B4, dated 5 April 2023. Sighted portal notification that the statement of compliance following review by the Certifier would be uploaded within the required 7 day period

- Sighted email from HI with correspondence between Council and others regarding the S68 approval for sewer, dated 3 June 2021
- Letter from Department of Planning and Environment confirming they had received the non-compliance notification that Audit 2 report and response was going to be submitted late
- Portal notification of the submission of the Audit 2 report and response, 14 March 2023
- Two non-compliance portal notifications for the late submission of the Audit 2 report and response and notification of the non-compliances, 14 March 2023
- Letter from DPE to HI approving Revision 3 of the Staging Report, dated 16 June 2022
- Correspondence between ADCO, Blackett Maguire and Goldsmith, CBRE and HI regarding Crown Certificate 1 submission of documents – Item B14 and B19. Final correspondence date 2 May 2022
- Works notification letter to residents from ADCO is dated 14 July 2022 regarding installation of Tower Crane
- Post approval receipt for the submission of the IEA 3 and Proponent's Response to the Planning Secretary, sighted
- Post approval receipt and submission receipt from DPE that the request for independent auditor approval was received on 26 October 2023
- Appointment of Experts letter from the Planning Secretary to HI, dated 27 October 2023
- Email from Murrumbidgee Local Health District to CBRE notifying that the IEA 3 report and Proponent's Response were published on the website, dated 23 August 2023
- Email from HI to CBRE notifying that the IEA 3 report and Proponent's Response were published on the website, dated 24 August 2023
- Works notification letter from HI for the removal of the tower crane on the 4 and 5 November 2023, dated October 2023
- OOHW application to dismantle tower crane attached to consultation email between CBRE and MLHD, dated 27 September 2023
- Post approval notification for the OOHW work request for 4 and 5 November 2023 to dismantle the tower crane
- DPE approval letter regarding OOHW for tower crane dismantling, dated 25 October 2023
- Consultation email from ADCO to Griffith City Council pursuant to conditions B31 and B34, dated 12 October 2023
- Aconex correspondence from ADCO to BMG with CC5 document submission pursuant to conditions B31, B33 and B34, dated 15 December 2023
- Email from the Abel Ecologist regarding bird box specifications and quote, dated 4 October 2023
- Cover letter HI to DPE for the submission of the Heritage Interpretation Delivery Plan pursuant to condition B27, dated 15 December 2023
- Post approval form from HI to DPE for the submission of the Heritage Interpretation Delivery Plan pursuant to condition B27
- Email from DPE to HI to confirm receipt of Heritage Interpretation Delivery Plan pursuant to condition B27, dated 15 December 2023
- Consultation email from ADCO to Griffith City Council regarding SSDA Modification 2, dated 1 November 2023
- Post approval receipt for incident notification to the DPE for a broken concrete pipe
- Post approval receipt for submission of incident report to the DPE
- Email from DPE to HI notifying of receipt of IEA 3 and Proponent's response, dated 18 August 2023
- Post approval receipt of non-compliance notification of the 11 non-compliances received in IEA 3
- DPE email acknowledgement that the non-compliance notification of 11 non-compliances was received, dated 15 August 2023
- Email consultation from HI and DPE regarding the minor nature of the incident notified, dated 6 September 2023 and a response from DPE agreeing that the requirement to adhere to Appendix 2 of the SSD-10353 was not necessary given the information already provided

- Letter from DPE to HI noting the specifics of the incident and that no environmental harm occurred as a result, and therefore, there was no further comment on the incident, dated 18 August 2023
- Email notification from the DPE acknowledging receipt of the letter dated 18 August 2023 notifying the Secretary of the current review being carried out on the strategies, plans and programs under SSD 9838218, dated 21 August 2023
- Post approval receipt of EMP (v4) submission through the portal
- Cover letter from HI to DPE for submission of EMP (v4), dated 18 December 2023
- DPE acknowledgement email that the EMP (v4) had been received, dated 18 December 2023
- Email from DPE acknowledging a review being carried out on the strategies, plans and programs under SSD 9838218, dated 21 August 2023
- Aconex transmittal submission of Mod 1 and Consolidated Consent to the Certifier, dated 4 October 2023
- Aconex transmittal notification that the letterbox drops for OOHW crane removal works were being delivered to sensitive receivers on 10 October 2023, dated 10 October 2023
- Aconex transmittal submission of EMP (v4) to the Certifier, dated 19 January 2024, after the fourth audit period
- Aconex transmittal submission of Incident Report to the Certifier, dated 24 January 2024, after the fourth audit period
- Aconex transmittal submission of Incident Report to the Certifier, dated 24 January 2024, after the fourth audit period
- Aconex transmittal submission of IEA 3 to the Certifier, dated 24 January 2024, after the fourth audit period
- Aconex correspondence from ADCO to Site Auditor Tom Onus Ramboll Australia regarding asbestos where Building 15 was demolished with remediation to be undertaken under the guidance of the Project hygienist, 11 July 2023
- Email from Steve Harley (Southern Asbestos Consultancy Pty Ltd) to ADCO notifying the air filters from the remediation work for Building 15 had been returned to sender and were sent to SLR for analysis in week commencing 29 January 2024, dated 29 January 2024
- Aconex correspondence from ADCO to Site Auditor Tom Onus Ramboll Australia engaging the Site Auditor to review the EI Australia Asbestos Clearance Report pursuant to C37 on 4 February 2024. Site Auditor confirmed satisfactory completion of the remediation via Aconex email, 5 February 2024. These correspondences occur outside of the audit period.

Reports and plans

- ENVIRONMENTAL MANAGEMENT PLAN, Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V2, dated 20/06/2022)
- ENVIRONMENTAL MANAGEMENT PLAN (EMP), Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V3, dated 30/10/2022)
- Environmental and Waste Management Plan, Version 2.0, MOITS, dated May 2022
- Construction Traffic Management Plan (CTMP) Rev 3, ptc., 21 June 2022
- Construction Traffic Management Plan (CTMP), Rev 6, ptc., 28 November 2022
- Construction Noise and Vibration Management Sub-Plan, E-Lab Consulting, dated 28 June 2022
- Construction Noise and Vibration Management Sub-Plan Rev 004, E-Lab Consulting, dated 28 November 2022
- Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021
- Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2
- Griffith Base Hospital - Heritage Interpretation Strategy, 21 November 2021
- Tree Management & Protection Plan, Revision: B, 12 April 2022.
- Griffith Hospital Stage 2 Redevelopment Contract Programme 11.02.22

- Construction Staging Report - Griffith Base Hospital Redevelopment - SSD-9838218 – Rev 3
- BCA CROWN CERTIFICATE - 1, CRO-22066, 28 June 2022
- BCA CROWN CERTIFICATE - 2, CRO-22068, 01 September 2022
- BCA Crown Certificate - 3, CRO-22114, 17 March 2023
- BCA Crown Certificate - 4, CRO-23021, 19 June 2023
- Civil Design Certification for CC1, Rev 01, 26 April 2022
- Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022
- Demolition Management Plan and Methodology, 1 Noorebar Avenue. Griffith, NSW, 2680 (MOITS, undated)
- Statement of Safety Compliance with AS2601-2001 (MOITS, undated)
- PRE CONSTRUCTION CONDITION SURVEY - External, AUDILAPS, (ADN22136A), 19 April 2022
- PRE CONSTRUCTION CONDITION SURVEY - Council, AUDILAPS, (ADN22136B), 19 April 2022
- Safety Compliance Statement, MOITS, undated
- Remediation Action Plan, 25 April 2020
- Griffith Base Hospital - Interpretation Plan, djrd architects, 03/06/22
- Statement of Compliance with DA Condition B9, E-Lab dated 14 April 2022 (ESD)
- Griffith Hospital – Environmental Monitoring Summary Report, AsBuilt Oct 2022
- Out of Hours Work application - Installation of tower crane within site compound, dated 27 April 2022
- Compliance Reporting - POST APPROVAL REQUIREMENTS, DPIE, May 2020
- Griffith IEA 3 Proponent Review and Response Report, dated 16 August 2023
- Aboriginal Impact Assessment (CPS 2021)
- Griffith Base Hospital Heritage Interpretation Delivery Plan, prepared by Betteridge Heritage for ADCO on behalf of HI, 6 December 2023
- Construction Environmental Management Plan Griffith Base Hospital Redevelopment, CLIENT - HI21266, ADCO Rev. No. V4, dated 14/12/2023
- EI Australia Additional Investigation and Remedial Works Plan, 4 May 2022.

Design certification, records, monitoring and inspections

- NGH Independent Audit Plan, June 2022
- Website (<https://gbhredevelopment.health.nsw.gov.au/ssda-documents>)
- HSE Project Specific Induction Griffith Base Hospital Redevelopment
- ADCO Induction (Corporate)
- Hammertech plant maintenance tracking system (digital platform)
- Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022
- Sighted Mawsons letter dated 5 September 2022 regarding confirming road base as 100% VENM from Milbrae Western Riverina Quarry.
- Mawsons Screened Sand Product Statement from Milbrae Darlington Point Sand Pit
- Mawsons 20 mm road base product statement Milbrae Warburn Quarry
- Architectural Design Certificate – Crown Certificate 3 – Façade and Roof – August 2022 (DJRD Architects)
- Noise and Vibration Monitoring Report 1 (June - November 2022)
- Noise and Vibration Monitoring Report 2 (December 2022 - January 2023)
- Noise and Vibration Monitoring Report 3 (February 2023)
- Noise and Vibration Monitoring Report 4 (March - April 2023)
- Noise and Vibration Monitoring Report 5 (May 2023)
- Noise and Vibration Monitoring Report 6 (June 2023)
- Environmental Monitoring Report 1 (April - November 2022)
- Environmental Monitoring Report 2 (December 2022 - January 2023)
- Environmental Monitoring Report 3 (February 2023)

- Environmental Monitoring Report 4 (March - April 2023)
- Redevelopment meeting minutes with St Vincent's Private Community Hospital, dated 20 April 2022 – redacted
- MOITS Site Instruction with scope of works, images and disposal receipts for asbestos soil removal. Site Instructions dated 27 July 2023 (Asbestos soil removal (hot spot)), 3 August 2023 (asbestos soil removal Building 15)
- Greenstar Riverina Skips Waste Management Reports, July 2023 to November 2023
- ASBUILT Griffith Hospital Environmental Monitoring Summary Report July to November 2023
- Hammertech Environmental Monitoring Report July 2023 to November 2023
- Sighted Letter from PTC to ADCO confirming that the proposed access and parking meets the requirements of Condition B33, CC5, dated 13 September 2023
- Acoustic Design Report Griffith Base Hospital prepared by E-LAB Consulting, Rev 5 16 November 2023
- Stantec CC5 Electrical services Certificate of Design – Electrical, 21 August 2023
- Structural Design Certification – CC5 (Rev 1), Acor Consultants, 3 October 2023
- Incident Report for failure of concrete pump, dated 15 August 2023
- EI Australia E25649.E11 Asbestos Clearance Inspection Report, 17 August 2023
- SafeWork NSW notice of intent to remove friable asbestos, Friable Asbestos Removal Licence AD212030 (Class A / ASA / Class B / ASB) Penny Green Pty Ltd, lodged 27 April 2022 and valid until 23 September 2024.

3.2. Compliance performance

In summary, the audit found five (5) non-compliances out of a total of 169 Conditions of Consent, refer to Table 3-1.

Table 3-1 Compliance performance

Condition part	Compliances	Non-compliances	Not triggered
A	22	2	11
B	22	2	11
C	32	1	11
D	-	-	35
E	-	-	20

Note: In relation to the tally above whole conditions of consent have been used to generate the tally. i.e., where a condition contains part a), b), c) etc this has been counted as one condition.

3.3. Summary of agency notices, orders, penalty notices or prosecutions

There have been no agency notices, orders, penalty notices or prosecutions to date.

3.4. Non compliances

Five non-compliances were raised in this audit, refer to Table 3-2.

Table 3-2 Non-compliances

Condition #	Requirement	Audit finding	Recommendations
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.	Refer to specific non-compliance status below.
A30	Within three months of: (a) the submission of a compliance report under condition A33 (b) the submission of an incident report under condition A26 (c) the submission of an Independent Audit under conditions C42 to C43 (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be	Following IEA 3 Report, the incident report (15 August 2023) and the determination of Modification 1, the Planning Secretary and Certifier should be notified that a review of any plans, strategies and programs are being reviewed. At the time of the fourth audit, only the Planning Secretary had been notified of a review following IEA 3.	Notify the Planning Secretary and Certifier within three months of a review of documentation following the submission of any of the documents identified in A30.

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Condition #	Requirement	Audit finding	Recommendations
	notified in writing that a review is being carried out.		
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>	<p>Ensure community consultation has been undertaken as required by this Condition, and the CNVMP is updated with the requisite information. This should be undertaken prior to commencement of Stage 2.</p> <p>Action required prior to 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>Erosion and sediment control measures in accordance with the Project ESCP were observed by the auditor at the time of the audit. However, measures and management of sediment leaving site remains problematic. Sedimentation was observed by the auditor in the gutter of Animoo Avenue, down-gradient of the site, at the time of the fourth audit.</p> <p>Refer to site inspection photographs.</p>	<p>Remove sediment from gutter of Animoo Avenue.</p>
C9	<p>The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including</p>	<p>In accordance with the CEMP, weekly inspections are being undertaken and recorded in the Hammertech system. The auditor noted a non-compliance, for</p>	<p>Maintain the site in a clean and tidy fashion to ensure safety and reduce environmental pollution.</p>

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Condition #	Requirement	Audit finding	Recommendations
	Sub-Plans).	<p>example, on 13/5/2023 sediment control logs were deteriorating and required replacement, this was closed out on 18/05/2023.</p> <p>In accordance with section 11.3.6 of the CEMP, measures are required to manage the impact of soils on nearby roads and surface water quality etc. The auditor observed the following during the fourth audit:</p> <ul style="list-style-type: none">- Sedimentation in the gutter down-gradient of the site access of Animoo Avenue- Community consultation for NVMP mitigation measures not carried out. <p>Refer to site inspection photographs.</p>	Ensure sediment controls are maintained and sedimentation in offsite areas is removed.

3.5. Previous audit recommendations

The third audit (July 2023) of the project recorded 11 non-compliances with conditions. Table 3-3 shows the status of each of the audit findings from the third independent audit of the project.

Table 3-3 Previous audit recommendations

Condition #	Requirement	Audit finding	Status
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.	Refer to specific non-compliance status 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.	Completed – rectified onsite after identification. Site made tidy. Ongoing Actions – Rubbish to be placed in bins and sedimentation controls to be maintained. Closed
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	Completed previously – Correct construction commencement date notified to Planning Secretary on 14 April 2023.

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Condition #	Requirement	Audit finding	Status
		<p>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.</p> <p>The notification letter was provided to the auditor on 5 January 2023 post completion of the first audit report.</p> <p>HI renotified the DPE on 14 April 2023 of the correct commencement of construction date of 4 May 2023.</p>	Closed
B2	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>No audit evidence provided for notification of the commencement of Stage 1 during the first audit.</p> <p>Refer above</p>	<p>Completed previously – Correct construction commencement date notified to Planning Secretary on 14 April 2023.</p> <p>Closed</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</p>	<p>Completed – CNVMP includes community consultation information and is published on the Griffith Base Hospital Redevelopment website.</p> <p>On-going Action – Ensure detailed community consultation on the revised</p>

Independent Environmental Audit 4

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
		not show if or how community were consulted in the development of any strategies outlined in the CNVMP.	CNVMP is undertaken prior to commencement of Stage 2. Ongoing for Stage 2
B22	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'.	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.	Completed – Rectified onsite after identification. Sedimentation downstream of the site inspected and cleared. On-going Actions – Rubbish to be placed in bins and sedimentation controls to be regularly inspected and maintained. Closed
B27	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 experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.	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. 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. The Griffith Base Hospital - Interpretation Plan applies only to built heritage as applicable to condition B11.	Action – Prepare a Heritage Interpretation Plan. Meeting held with Betteridge Heritage on 1 August 2023 in relation to preparation of the Plan. Closed

Independent Environmental Audit 4

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
		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.	
C6	Construction activities may be undertaken outside of the hours in condition C4 and C5 if required: (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	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. The works notification letter to residents from ADCO is dated 14 July 2022.	Completed – Affected residents notified 7 days prior, unaffected residents notified 48hrs prior. On-going Action – Notify affected residents at least 7 days prior to the works occurring. Closed
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).	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: <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 Sedimentation on public path adjacent to down-gradient site boundary and built up in the gutter of Animoo Avenue. 	Completed – Affected residents notified 7 days prior, unaffected residents notified 48hrs prior. On-going Action – Notify affected residents at least 7 days prior to the works occurring. Closed

Independent Environmental Audit 4

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
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.	Addressed in management plans. Waste on occasions, observed to not be contained within designated waste storage areas.	Completed – Rectified onsite after identification. Site made tidy. Action – Rubbish to be placed in bins, increase number of bins on site. Closed
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.	The site audit for Audit 2 was undertaken on 11 January 2023. The Audit 2 report was provided on 10 March 2023. The Audit 2 report and response was submitted to the Planning Secretary on 16 March 2023.	Completed – Audit and proponent response sent to DPE. Action – Submit audit and proponent response within two months of date of audit site inspection. Closed

3.6. Environmental plans, sub plans and post approval documents

The project operates under an Environmental Management Plan (EMP) and a range of subplans required by the Conditions of Approval. The current version of the EMP (CV4) is dated 14/12/2023.

The EMP includes the following standalone sub plans and supporting plans:

- Construction Noise and Vibration Management Plan (Sub-plan)
- Construction Traffic and Pedestrian Management Plan (Sub-plan)
- Environmental and Waste Management Plan (Sub-plan)
- Aboriginal Archaeological and Cultural Heritage Management Plan
- Heritage Interpretation Strategy.

The plans and strategies, and where updated, generally address the requirements of the Approval and reflect the key risks on site.

The fourth audit has found general compliance with the implementation of environmental management plans, with the exception of sedimentation in the gutter of Animoo Avenue, which is not in accordance with the Project CEMP. Operating hours are in accordance with the approved hours with OOHW notifications submitted to and approved by the Planning Secretary, which are:

between 7am and 6pm, Mondays to Fridays inclusive; and
between 8am and 1pm, Saturdays.

No work may be carried out on Sundays or public holidays.

Community consultation is required by the Conditions of Consent, the EMP (v4) and sub-plans. Community consultation has addressed by HI Project Newsletters, which are published every three months, and Works Notifications, which are issued by HI at notable times in the construction calendar or prior to OOHW, such as crane delivery or removal. For this audit period there is a works notification dated October 2023 and Project newsletters (July 2023 and October 2023) published on the Project website.

Monitoring for compliance with noise and vibration limits continues. This information is collected in real time with data recorded in an environmental monitoring system (asBuilt Vault) which has the capability to alert exceedance of monitoring criteria. At the time of the fourth audit the Noise and Vibration Monitoring Report for the audit period (July to November 2023) was available on the website.

Environmental monitoring reports are prepared drawing from the Hammertech system. At the time of the fourth audit the summary of weekly environmental reporting was available for the May to November 2023 period.

3.7. Environmental performance

ADCO operates an Environmental Management System as per the requirements of AS14001:2015 (Environmental Management Systems). The system has been independently certified.

Environmental performance of the project is measured via regular inspections, monitoring and reporting. The audit found that the site is well managed, and maintenance of environmental controls is occurring weekly. The environmental monitoring report for May 2023 to November 2023 show weekly inspections are being undertaken. Where a non-compliance is registered, detail of the non-compliance is recorded and a close out date.

The audit found that key environmental controls are in place including:

- Erosion and sediment controls, however as noted in relation to B22 and C9, some controls are not being adequately managed

- Waste management for waste separation.

3.8. Consultation outcomes

DPE and Griffith City Council were consulted for this fourth audit. No response from Griffith City Council had been received at the time of issuing the fourth audit report. A response was received from the DPE, who requested that during Audit 4 a focus be applied to the following above the requirements of the conditions:

- Management of noise and dust
- Operating hours
- Truck movements
- Erosion and sediment control, including dirt tracking on to roads
- Community consultation
- Complaints management.

Consultation is provided in Appendix D.

The Independent Audit response to the focus areas requested by the DPE are provided in the following sections:

- Management of noise and dust - refer to section 3.11
- Operating hours - refer to section 3.6
- Truck movements - refer to section 3.11
- Erosion and sediment control, including dirt tracking on to roads - refer to section 3.11
- Community consultation – refer to section 3.6
- Complaints management – refer to Section 3.9.

3.9. Complaints

There had been no complaints received at the time of the fourth site audit as identified in the blank complaints register via the link on the Project website and as discussed in the site audit interview. Complaints are either directed to ADCO via hotline phone number on the site noticeboard or to HI via the HI email address on the Project website and community notifications.

Refer to https://gbhredevelopment.health.nsw.gov.au/getmedia/9cf02a0e-4855-432c-b3c6-6060e18345f0/220620-GBHR-Main-Works-Complaints-Register_online.xlsx.aspx

3.10. Incidents

The audit noted that there was one incident reported during the fourth audit reporting period. The incident took place on 14 August 2023 at 10:00 am. A concrete delivery pipe, connected to a concrete boom pump, ruptured under pressure, splitting open and releasing concrete slurry over a concrete delivery truck whilst doing the Zone A Pour 4 Lower Ground. The concrete boom pump had five sections to its boom arm. The pipe was located on section 3. The incident appears to have been caused by a blockage.

Actual harm occurred to property and the risk outcome was medium. The incident was reported on the 15 August 2023 and SafeWork was notified. The corrective actions have been applied and documented in the incident report, submitted within seven days of notifying the Planning Secretary.

3.11. Actual versus predicted impacts

A review of relevant sections of the EIS was undertaken to ascertain the expected impacts during this construction stage of the project. Additionally, a review of the relevant management plans was undertaken to compare the predicted impacts against the actual impacts.

The project footprint is consistent with the EIS and the methods of construction were generally consistent with, or less impacting than, the methods described for this stage of works in the EIS.

Transport and accessibility

A Construction Traffic Management Plan has been prepared by ptc. consultants. The audit noted that the requirements of the plan were generally being implemented at the time of the fourth audit inspection, including no observed contractor parking in the identified exclusion zones.

Truck movements are managed with a scheduling application, however, not every truck making deliveries to the site is tracked. Full time traffic control was observed to be located at the site access.

Heritage

The EIS notes that the proposal includes demolition of buildings constructed in the 1930s. The audit notes that there have been no unexpected finds to date. The EIS recommended that:

- An archival recording should be undertaken of Buildings 17, 19, 20 and 28
- Original joinery circa 1931-36 should be salvaged and reused
- An interpretation strategy and plan should be developed
- Moveable heritage items should be used in an interpretive display.

The Griffith Base Hospital Heritage Interpretation Plan was developed and has been implemented for the project addressing the above points.

Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the EIS. The ACHAR did not anticipate direct impacts to Aboriginal Heritage but did recommend that an Unexpected Finds Procedure be prepared. Section 11.3.17 of the updated EMP (V4) now addresses unexpected aboriginal heritage finds. There have been no unexpected finds reported up to the date of the site inspection.

The Heritage Interpretation Strategy and the Heritage Interpretation Plan have been prepared.

Biodiversity

The EIS identified all trees outside of the development footprint are required to be retained and protected during construction. It was noted during the site investigation that the vegetation to be retained was protected in accordance with the Tree Management and Protection Plan.

CPS Arboricultural Advice was provided in a letter, dated 26 April 2023, which was appended to the Arboricultural Impact Assessment (CPS 2021) identifying the tree for removal.

Ecologically sustainable development

ESD principals have been incorporated into the design. The requirement to carry these principals through to the designs for construction has been included in the conditions of consent for the project. The project

certifier Blackett Maguire Goldsmith have certified that the ESD principals have been carried through to-date, citing Statements of Compliance provided by E-Lab Consulting.

Noise and vibration

The EIS states that “An assessment of construction noise and vibration has been undertaken. Noise predictions indicate some exceedance of the project noise management levels. This is not atypical for a project of this size which is being constructed in proximity to sensitive land uses. Vibration generated by heavy construction works are expected to generally comply with cosmetic damage limits excepting select pieces of machinery which may need to be carefully reviewed for implementation on the site.”

Accordingly, a Construction Noise and Vibration Management Sub-Plan has been prepared by E-Lab Consulting. The plan sets noise management levels for the project. E-lab issue notifications if noise or vibration monitoring exceeds the criteria.

Noise and vibration monitoring is ongoing for the Project. During the fourth audit period the peak noise reading occurred on 25 September 2023 from sensor NOISAU-005 of 90.4 dB. Furthermore, there have been no complaints regarding noise up to the date of the fourth site audit.

Soil and water

Site drainage, and erosion and sediment controls are addressed in the EMP. Erosion and sediment controls were implemented largely in accordance with the Project ESCP and were mostly being adequately maintained at the time of the fourth site audit, including perimeter sediment fencing. This fourth audit did observe sedimentation in the gutter of Animoo Avenue.

A clean piece of geofabric was underlain the rumble grid at the site access. Sedimentation caught in the sediment fence along the southern boundary had been removed and there was no observed sedimentation spill to the footpath adjacent to the southern site boundary. The soil of the construction material storage area, near the site access, was covered with a geotextile to prevent soil erosion. Some areas of soil were exposed due to trenching works. However, a hose was located along the southern boundary, adjacent to the works, for dust suppression.

Waste

The EIS identified the volume and waste streams expected during construction. These findings have been transferred to the EMP. The EMP addresses waste management. The requirements of the EMP and the Construction Waste Management Sub Plan (Moits 2022), including waste and material tracking, were being met at the time of the audit site inspection.

The audit noted that the CWMSMP was being implemented with observed waste separation on site and on-site chemical storage (refer to photographic evidence in Appendix C).

Contamination

A Preliminary Environmental Site Assessment (PESA) and Phase 2 Environmental Site Assessment was prepared for the proposed development by JK Environments. The ESA recommended the preparation of a Remediation Action Plan (RAP). This RAP was subsequently prepared by JK Environment. A contaminated land Site Auditor has been engaged for the project.

During the fourth audit period, a hot spot of asbestos contaminated soil was removed. An Asbestos Clearance Inspection report was prepared by EI Australia (17 August 2023). The remediation works were carried out in accordance with the Remediation Action Plan prepared by JK Environments (25 April 2020). The remediation works were under the SafeWork notification submitted on 27 April 2022, which has an

expiry date of 23 September 2024. Site personnel and contractors were advised verbally of the asbestos remediation works occurring on site and associated exclusion zones.

Air filters for laboratory analysis of asbestos fibres were sent to SLR. However, the package was returned to sender due to bag damage. The samples have been located at the post office from which they were sent. The filters are in a sealed package and have been re-sent to SLR for analysis. The results are still outstanding.

The Site Auditor was engaged on the 4 February 2024 to confirm satisfactory completion of the remediation carried out for the Asbestos soil removal from the hotspot and building 15. Confirmation was provided by the Site Auditor on 5 February 2024.

3.12. Site inspection

The site inspection found the site to be generally tidy, with areas of stockpiled construction material adjacent to the site access or the access road, to make room for trenching works taking place. The purpose of the site inspection was to check that housekeeping measures in accordance with the CEMP and subplans, and environmental controls, were implemented and maintained. The site visit found that:

- Nurse stations with emergency call button and fire extinguisher were located around the site, one next to the flammable liquids cabinet
- Spill kits were labelled, located around the site and contained the necessary absorbent material
- A rumble grid was located at the construction site access over a clean piece of geotextile
- Sediment fencing and drain coverings were in place in accordance with the ESCP. Sediment fencing was observed to be maintained and secured.
- Minimal mud tracking on Animoo Avenue even though there had been wet weather the previous day. However, there continues to be sedimentation in the gutter of Animoo Avenue down-gradient of the construction site access
- No sedimentation along the access path adjacent to the southern site boundary
- Exposed surfaces observed where trenching works are occurring
- Contractor and / or sub-contractors are not parked in the exclusion zones in accordance with the CTMP
- Waste receptacles are located in a central area for waste management and around the boundary of the site where works are occurring
- The site is clearly fenced
- Hoarding was in good condition
- Tree protection was in place, maintained and fulfilling the task of tree protection
- Site signage was in place and details had been updated for a change in the Site Manager.

Photos of the site are provided in Appendix D.

3.13. Site interviews

Site interviews occurred with staff from ADCO and Turner and Townsend during the course of the site audit, including those listed in Section 2.4. The interviews found that staff broadly understood the requirements of the CoC and the Management Plans.

3.14. Previous annual review or compliance report recommendations

This is the fourth audit of the Project and compliance reports are not required in the CoC until following occupancy and prepared within 52 weeks of operation.

3.15. Improvement opportunities

The auditor noted the following improvement opportunities as observed during the audit:

- Clean up the spoil that had spilled beyond the site boundary in the south-eastern corner of the site, refer to site inspection photographs in Appendix D
- A review is required of erosion and sediment controls at the site construction access to ensure that with ongoing wet weather, mud tracking on to local roads and sediment-laden water movement down-gradient along Animoo Avenue is minimised, refer to Appendix C. Consider engaging a clean-up crew / street sweeper to remove sedimentation in the gutter a time when cars can be excluded from parking.
- Refix signage on the flammable cabinet, refer to site inspection photographs in Appendix D
- Update the timing in the Staging Plan to reflect more accurate timing
- Maintain the Project website with all the environmental assessments, EIS, Response to Submissions and the Modification 1 Report.

3.16. Key strengths

The auditor notes the following key strengths as observed during the audit:

- The Project has not received any complaints from community or other stakeholders
- The site is generally tidy and maintained
- All of the physical erosion and sediment controls, as identified on the erosion and sediment control plan, are in place and maintained
- The Project website has been updated with all plans, Independent Audit 1 and 2 and responses, noise and vibration monitoring reports and most environmental monitoring performance reports.

4. Recommendations

4.1. Summary of compliance and non-compliances against conditions

Five (5) non-compliances were raised in this audit.

Table 4-1 Summary of non-compliances

Condition #	Requirement	Audit finding	Recommendations
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.	Refer to specific non-compliance status below.
A30	Within three months of: (a) the submission of a compliance report under condition A33 (b) the submission of an incident report under condition A26 (c) the submission of an Independent Audit under conditions C42 to C43 (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	Following IEA 3 Report, the incident report (15 August 2023) and the determination of Modification 1, the Planning Secretary and Certifier should be notified that a review of any plans, strategies and programs are being reviewed. At the time of the fourth audit, only the Planning Secretary had been notified of a review following IEA 3.	Notify the Planning Secretary and Certifier within three months of a review of documentation following the submission of any of the documents identified in A30.
B18	The Construction Noise and Vibration Management Sub-	The CNVMP and specifically Section 7.3 provides strategies	Ensure community consultation has been

Condition #	Requirement	Audit finding	Recommendations
	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);	for community consultation and complaint management. It does not include strategies that have been developed with the community for managing high noise generating works. 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.	undertaken as required by this Condition, and the CNVMP is updated with the requisite information. This should be undertaken prior to commencement of Stage 2. Action required prior to Stage 2.
B22	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'.	Erosion and sediment control measures in accordance with the Project ESCP were observed by the auditor at the time of the audit. However, measures and management of sediment leaving site remains problematic. Sedimentation was observed by the auditor in the gutter of Animoo Avenue, down-gradient of the site, at the time of the fourth audit. Refer to site inspection photographs.	Remove sediment from gutter of Animoo Avenue.
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).	In accordance with the CEMP, weekly inspections are being undertaken and recorded in the Hammertech system. The auditor noted a non-compliance, for example, on 13/5/2023 sediment control logs were deteriorating and required replacement, this was closed out on 18/05/2023. In accordance with section 11.3.6 of the CEMP, measures are required to manage the	Maintain the site in a clean and tidy fashion to ensure safety and reduce environmental pollution. Ensure sediment controls are maintained and sedimentation in offsite areas is removed.

Condition #	Requirement	Audit finding	Recommendations
		<p>impact of soils on nearby roads and surface water quality etc. The auditor observed the following during the fourth audit:</p> <ul style="list-style-type: none"> - Sedimentation in the gutter down-gradient of the site access of Animoo Avenue - Community consultation for NVMP mitigation measures not carried out. <p>Refer to site inspection photographs.</p>	

5. Conclusion

The audit found five (5) non-compliances with the Conditions of Consent. The document review found that Environmental Management Plans and sub plans are relevant to the site and are generally being implemented.

Table 5-1 Compliance performance

Condition part	Compliances	Non-compliances	Not triggered
A	22	2	11
B	22	2	11
C	32	1	11
D	-	-	35
E	-	-	20

Appendix A Auditor CV and Declaration of Independence

- Natascha Arens
- Nicola Smith

Natascha Arens | BAppSc (Conservation Mgt), MBEM, CEnvP, MEIANZ, Certified Lead Auditor

Principal Environmental Consultant

Systems Manager

Natascha launched the Sydney Branch of NGH in 2006. She has around 30 years of professional experience in environmental management and impact assessment and began her career as an ecologist in South Eastern NSW.

She has worked in both the public and private sector. Natascha has a wealth of experience in environmental impact assessment for large infrastructure projects. She is an Exemplar Global Lead Environmental Auditor and has extensive auditing experience across a range of industries.

The diversity of her planning experience coupled with her onsite and project management experience has equipped her with an excellent understanding of environmental issues, legislation and planning in regional and urban environments. Natascha gives clients assurance that NGH will use innovation and breadth of company history to drive sustainable outcomes for projects.

Natascha has a leading role in the operational performance of the company. Instigating improved environmental performance is something Natascha pursues with enthusiasm.



Focus areas

- Environmental auditing
- Environmental Impact Assessments
- Legislation interpretation
- Environmental Management Plans
- Preliminary Environmental Constraints Assessments & Scoping Reports
- Expert reviewer (CEnvP-IA)
- Stakeholder and Community Engagement
- Environmental training and workshops

Professional associations and accreditations

- Environmental Institute of Australia and New Zealand (EIANZ) member
- Certified Environmental Practitioner – CEnvP # 130
- Exemplar Global Certified Principal Environmental Auditor # 105783
- NGH Director
- CCRSS Director and Secretary (Voluntary Role)

Project experience

Renewable energy

Maxwell Solar Farm (Maxwell), Muswellbrook, NSW

The \$40m, 25MW solar farm on a rehabilitated coal mine site will produce electricity for the Maxwell infrastructure and export to the grid, the first large scale example in New South Wales. As **Project Director** Natascha undertook the final review of reports, from the initial constraints and Scoping Report to the EIS and Submissions Report. She worked with the project team to overcome challenges with approvals.

Gunning Windfarm (Acciona), Gunning, NSW

Gunning Wind Farm is a 46.5MW wind farm comprising 31 turbines and located 35km north east of Canberra. Natascha provided was the **Senior Environment Adviser** throughout the construction phase of this project. She ensured management plans complied with the Department of Plannings requirements and the conditions of consent and oversaw effective implementation of the plans on site throughout the construction phase.

Dunedoo Solar Farm (IBVoigt) Dunedoo NSW

Dunedoo Solar Farm is a 55-MW AC solar farm generally comprising a solar array, access roads, on-site substation and a 66-kV Transmission Line. As **Project Director** for this project, Natascha undertook senior review and final sign off on the EIS. She also worked with the client and the NGH team to navigate some challenging road access and grid connection requirements.

Linear infrastructure

Albion Park Rail Bypass (TFNSW) Albion Park, NSW

The Albion Park Rail bypass is a \$630 million project funded by the NSW Government that completes the 'missing link' for a high standard road between Sydney and Bomaderry. It is an important freight, bus and tourist route.

As **Project Director** for this project, Natascha worked closely with the TFNSW and Cardno team to prepare the Scoping Report, Biodiversity Assessment and Preferred Activity report. Later in the project she undertook a **Project Management** role for the preparation of the Construction Environmental Management Plans for the early works package.

Pacific Highway Upgrades (Lend Lease) Karuah Bulahdelah, Napiac, Yelgun-Chinderah, Brunswick -Yelgun, Tugun Bypass , NSW

The Pacific Highway upgrade is the largest road infrastructure project in Australia. It connects Sydney and Brisbane, and is a major contributor to the country's economic activity. The Australian and NSW governments have been jointly funding the Pacific Highway upgrade since 1996.

Natascha was the **Environmental Manager** on over 100kms of the Pacific Highway upgrade during the first ten years of operation. She undertook regular inspections and audits of these projects to ensure operation of the highway met the TfNSW specifications and standards.

Bringelly Road Upgrade (TfNSW) Bringelly, NSW

The Australian and NSW governments are upgrading Bringelly Road between Camden Valley Way, Leppington and The Northern Road Bringelly as part of the Western Sydney Infrastructure Plan, a \$3.6 billion road investment program.

Natascha was **Project Director** for Stage 1 of the Bringelly Road upgrade. She led the NGH team who prepared the environmental impact assessment, including specialist studies for biodiversity and heritage.

Empire Bay Drive Upgrade Project REF (AT&L, RMS), Kincumber, NSW

A significant upgrade to two lanes each direction of a highly trafficked section of the Central Coast, Empire Bay Drive at The Scenic Road, Kincumber. As **Project Director**, Natascha liaised reviewed all outputs associated with the Project REF and specialist biodiversity and Aboriginal Heritage studies, along with an Addendum REF, Submissions Report and Environmental Management Plans.

Natascha worked with the project team to resolve issues and to ensure that deadlines were met and a high-quality document was put on display.

Mining and resources

Coraki Quarry (KIS), Coraki, NSW

Coraki Quarry is a hard rock quarry, classified as State Significant Development (SSD) under the EOA&A Act. As the Department of Planning approved **Independent Environmental Auditor** on the Project, Natascha was responsible for auditing compliance with the operational requirements of the SSD condition of consent and the Environmental Protection Licence.

Defence

Holsworthy Barracks Mid-Term Refresh (Beca & Defence), Sydney, NSW

Holsworthy Barracks Mid-Term Refresh was an interim project aimed at sustaining operations until the Holsworthy Barracks Redevelopment Project. Natascha was the **Project Director** leading the environmental impact assessment. Natascha worked with the client to untangle the planning pathway for the project which occurred on both public and defence land.

HMAS Platypus (Sydney Harbour Foreshore Trust), Neutral Bay, NSW

The former HMAS Platypus site (Platypus) was formally transferred to the Harbour Trust on 23 July 2005. It has had a diverse history including as gas works, a Naval torpedo maintenance facility, the HMAS Platypus submarine base and now as an emerging new public park.

Natascha was the **Project Manager** for various projects undertaken on this site by NGH between 2010 and 2016 including marine surveys, aquatic biodiversity assessment and subsequent sea horse relocation and management plan.

Government

Foxground to Berry (TfNSW & Fulton Hogan), Berry, NSW

The Foxground to Berry Bypass is a four-lane highway with median separation for 12.5 km of the Princes Highway south of Wollongong. As **Project Director**, Natascha undertook final review of all reports. Natascha worked on this project for five years, reviewing all outputs of the construction and post-construction ecological monitoring. Performance criteria were set at the EIS stage and during the construction phase. Monitoring included weed, aquatic, frog, and fauna surveys (Spotlighting, call playback, camera detection and scat and track surveys) and water quality (including macroinvertebrates). Roadkill was also monitored during construction and the first year of operation. Heat maps of roadkill hotspots were identified and used to make recommendations for further exclusion fencing.

Elizabeth Bay Marina (RMS), Elizabeth Bay, Sydney, NSW

The 100 year old Elizabeth Bay Marina was upgraded in 2018; the marina was vulnerable to flooding and had begun to deteriorate due to its age. Natascha was the **Project Director** overseeing the delivery of the environmental impact assessment and specialist Biodiversity and heritage assessments under an incredibly tight timeline. She also worked with RMS to undertake public consultation both prior to the impact assessment and during the public exhibition of the impact assessment.

Water

Murrumbidgee to Googong Pipeline (Iconwater), Canberra, ACT

A 12-kilometre pipeline that can transfer water from the Murrumbidgee River into the Googong Reservoir, developed as part of a suite of water security projects initiated during the Millennium Drought. Natascha is the Department of Planning approved **Independent Environmental Auditor** for this project. Natascha reviewed the project against the measures committed to in the consent and the operational management plan for the project. She made recommendations to the project team to facilitate continuous improvement.

Industrial

St Marys Intermodal (Pacific National), Sydney, St Marys, NSW

St Marys Freight Hub a State Significant Development project services major retail distribution centres and warehouses across Greater Western Sydney, including major industrial estates. Natascha was the Department of Planning approved **Independent Environmental Auditor** for this project. Natascha undertook compliance audits for this project from the early works phase and throughout the construction of the project.

Land development

Sydney Childrens Hospital (Health Infrastructure), Bowral, NSW

The \$658 million Sydney Children's Hospital Stage 1 and Minderoo Children's Comprehensive Cancer Centre brings world-leading clinical care, research and education together under one roof to transform kids' health. Natascha is the Department of Planning approved **Independent Environmental Auditor** for this project. This project is part of the greater Randwick Campus Redevelopment

New Maitland Hospital (Health Infrastructure), Maitland, NSW

The NSW Government has invested \$470 million in delivering the new Maitland Hospital, to meet the growing health service needs for the surrounding communities of the Hunter Valley now and into the future. Natascha is the Department of Planning approved **Independent Environmental Auditor** for this project. This project was undertaken on a green field site with native vegetation communities and potential Aboriginal deposits present. Natascha undertook compliance audits for this project from the early works phase through to operation of the hospital.

Campbelltown Hospital redevelopment (Health Infrastructure), Campbelltown, NSW

The NSW Government has invested 632 million upgrade of Campbelltown Hospital and the redevelopment which will see a new clinical services building as well as

refurbishment of existing buildings.. As the approved **Independent Environmental Auditor** for this project Natascha undertook compliance audits for this project from the early works phase through construction. This project was undertaken adjacent to an operating hospital and subject to stringent noise and vibration requirements.

Royal Hall of Industries (Sydney Swans), Sydney, NSW

Sydney Swans transformed the historic Royal Hall of Industries into a world-class sporting and community hub for not-for profits and elite training facility for the Sydney Swans and their youth Academy. As the approved **Independent Environmental Auditor** for this project Natascha undertook compliance audits for this project from the early works phase through construction.

6. Appendices

Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Griffith Base Hospital Redevelopment
Consent Number	SSD-9838218
Description of Project	Redevelopment of Griffith Base Hospital
Project Address	5-39 Animoo Avenue, Griffith NSW
Proponent	Health Administration Corporation
Date	20 December 2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

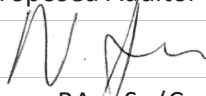
- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor Natascha Arens

Signature



Qualification BAppSc (Conservation Mgt), MBEM, CEnvP, MEIANZ, Certified Lead Auditor

Company NGH Pty LTD

Nicola Smith | BSc MPhil

Regional Manager - Environmental Management

Nicola leads a team of environmental management consultants. She has over 10 years of experience across multiple disciplines and has worked on planning and approval projects, post-approval environmental management, and a variety of projects in the renewable energy sector, extractive industries, infrastructure, manufacturing, and waste management. Nicola is an experienced project manager and report author for all phases of project development, including field investigations, approval documents, environmental management plans, and monitoring programs.



Focus areas

- Technical review and quality control
- Stakeholder and client engagement
- Environmental management and monitoring
- Soil and geomorphological investigations
- Contaminated land investigations
- Environmental compliance monitoring programs and reporting
- Preparation of environmental management plans
- Geographical Information Systems (GIS)

Professional associations and accreditations

- Environment Institute of Australia and New Zealand (EIANZ) member
- Erosion and Sediment Control – Blue Book Training
- River Styles® Accreditation
- National WHS General Construction Induction Training (White Card)
- First Aid Certificate
- Rail Industry Workers (RIW)
- Green Steps Sustainability Program

Project experience

Renewable energy

Culcairn Solar Farm (Neoen), Culcairn NSW

The site will be developed by Neoen and will comprise solar generation capacity of 350 megawatts (MW), as well as a battery with a 100 MW, two-hour capacity. The site also connect to the National Electricity Market via TransGrid's 330 kilovolt transmission line already on site. **Project Manager.** Delivery, authoring and management of the Environmental Impact Assessment (EIA) and associated documentation, as well as technical advice and client contact. Report author and reviewer of post-approval construction environmental management plans.

Coleambally Battery Energy Storage System (Risen Energy), Coleambally NSW

The Coleambally Solar Farm is a 150MW renewable electricity project with 567,828 solar panels which will displace 307,800 tonnes of CO2 emissions and power 103,000 homes. **Project Manager.** Delivery, authoring and management of the Environmental Impact Assessment (EIA) and associated documentation, as well as technical advice and client contact. Author of the soil survey assessment report.

Sebastopol Solar Farm (FRV Services Australia), Sebastopol NSW

Now operational, Sebastopol solar farm provides clean energy to the equivalent of over 40,000 NSW homes. **Preliminary Site Investigation author.** Field investigation and report author of a Preliminary Site Investigation.

Lismore Battery Energy Storage System (Maoneng Australia), Lismore NSW

This project will involve the development of a utility-scale battery energy storage system near Lismore in northern New South Wales; the Lismore BESS will have a capacity of 100MW which will connect into the Lismore 330kV transmission substation.

Soil Survey Author. Preparation of report describing the soil characteristics of the proposed site and analysis of the field and laboratory data to characterise the potential for erosion during construction, operation, and decommissioning. In addition, provide a benchmark for soil condition for rehabilitation.

Middlebrook Solar Farm (Total Eren), Tamworth NSW

The proposed Middlebrook Solar Farm will produce up to 500 megawatts alternating current. **Soil Survey Author.** Preparation of report describing the soil characteristics of the proposed site and analysis of the field and laboratory data to characterise the potential for erosion during construction, operation, and decommissioning. In addition, provide a benchmark for soil condition for rehabilitation.

Alectown Wind Farm (Neoen), Alectown NSW

The proposed 120 MW wind farm will generate energy that will be supplied directly into the national electricity grid through a proposed connection into the 132 kV Parkes to Wellington transmission line. **Project Manager.** Delivery, authoring and management of the Scoping Report and associated documentation, as well as technical advice and client contact.

Avonlie Solar Farm (Iberdrola), Narrandera NSW

This project will be a large-scale solar farm in Narrandera, New South Wales. The project will comprise more than 450,000 solar panels with a total energy capacity of up to roughly 245MW(DC). **Ecologist, Project Manager.** Biodiversity surveys pre-approval. Contributor to the Environmental Impact Assessment, project manager of the

post-approval period and author of construction environmental management plan updates.

Burrawong Wind Farm (Windlab), Balranald NSW

Burrawong Wind Farm could host up to 107 wind turbines and produce enough clean energy to power up to 470,000 homes. **Project Manager.** Delivery, authoring and management of the Scoping Report and associated documentation, as well as technical advice and client contact.

Snowy 2.0 Transmission Line Connection Project (UGL), Kosciuszko National Park and Bago State Forest, NSW

Snowy 2.0 is the largest committed renewable energy project in Australia. The Transmission Connection Project will connect Snowy 2.0 Main Works into the National Electricity Market. **Technical lead and field technician.** Technical lead and field technician for the pre-construction baseline water quality monitoring for the project, which included over 18 months of water sampling at 12 locations associated with the project, a pre-construction water quality monitoring strategy and post-monitoring event reporting.

Beryl Solar Farm (Tranex Solar), Gulgong NSW

When completed, the 309,000 advanced solar modules on the Beryl Solar Farm will produce energy to run approximately 25,000 average NSW homes, displacing more than 167,000 metric tons of carbon dioxide emissions per year. **Workstage Manager.** Managing the deliverables associated with post-approval environmental management, which includes the implementation of agri-trials to determine the most appropriate method of groundcover management for the site.

Linear infrastructure

Parkes Intermodal Site and Soil Assessment (BG&E), Parkes NSW

Site and soil analysis for an on-site sewage management system to support the development of the Parkes Logistics Terminal. **Project Manager.** Collection of soil samples from the project site. Analysis of site physical characteristics, laboratory data and project details to determine the site suitability, location and design of an on-site sewage management system in general accordance with the relevant guidelines.

Henry Lawson Drive (Lyall & Associates), Milperra NSW

The NSW Government is upgrading Henry Lawson Drive to reduce congestion and improve safety and connectivity. **Report author.** Data analysis and report author of a construction and operation surface water assessment for the upgrade of Henry Lawson Drive.

Melbourne Airport SAP3 Signalling Power Supply Upgrade Contamination Assessment (BG&E), Melbourne VIC

Contamination assessment prior to signalling power supply upgrades for the rail corridor between Sunshine to Albion for ARTC upgrade works for the commencement of the Melbourne Airport Rail. **Field technician and report author.** Sample collection, data analysis and report preparation of the contamination assessment.

Barton Highway Upgrade (TfNSW), NSW

The objectives for the Barton Highway align with the objectives in the Long-Term Transport Master Plan. The objectives for the Barton Highway are: Improve liveability and reduce social disadvantage, improve economic growth and productivity, provide scope for regional development and accessibility, improve sustainability, improve safety and security, and improve transport integration process. **Field technician.** Collection of soil samples for Optically Stimulated Luminescence (OSL) dating, and preparation of soil logs in proximity to Aboriginal cultural heritage salvage works.

Echuca-Moama Bridge Project – Stage 4 Moama Intersection Detailed Site Investigation (TfNSW), Moama NSW

TfNSW are looking to divest a parcel of land, which is currently used for residential purposes. A Detailed Site Investigation was required to determine the type and extent of contamination at the site. **Field technician and report author.** Sample collection, data analysis and report preparation of the Detailed Site Investigation.

Land management

Lake Victoria Geomorphological and Erosion Assessment (South Australia Water), Lake Victoria NSW

Lake Victoria is managed by SA Water as a water reservoir for South Australia domestic water but is overseen by the MDBA. The ancient lake has over 1,000 Aboriginal heritage sites recorded. Due to ongoing water management an Aboriginal Heritage Impact Permit is required to continue to operate the lake **Field technician and report author.** Collection of soil samples and landscape descriptions and mapping to support independent recommendations on Lake management that best supports the conservation of Aboriginal cultural heritage. Provision of a geomorphic risk assessment of the new permit area with a focus on the threats of erosion to Aboriginal cultural heritage.

Crookwell Landfill Surface Water and Groundwater Assessment and Management Plan (Upper Lachlan Shire Council), Crookwell NSW

A Surface Water and Groundwater Assessment, and Management Plan, of the current landfill to meet the requirements of the Environmental Protection Licence. **Project Manager.** Delivery, authoring and management of the Surface Water and Groundwater Assessment and the Surface Water and Groundwater Management Plan. Key client contact.

Crookwell Landfill Closure Plan (Upper Lachlan Shire Council), Crookwell NSW

A Landfill Closure Plan as required by the NSW EPA and in accordance with the Solid Waste Landfill Guidelines 2016. **Project Manager.** Management of deliverables, landfill surface gas monitoring and author of the Landfill Closure Plan.

North Ridge Materials Facility (Riverina Warehousing Solutions), Wagga Wagga NSW

The North Ridge Materials Facility would convert an historic liquid waste evaporation pond into a non-putrescible solid waste disposal cell and leachate evaporation pond. The main waste cell would have the capacity to accept about 630,000 m³ of non-putrescible waste. **Project Manager.** Delivery, authoring and management of the

Environmental Impact Assessment (EIA) and associated documentation, as well as technical advice and client contact.

Auditing and compliance

Griffith Base Hospital Audit (NSW Government), Griffith NSW

The \$250 million Griffith Base Hospital Redevelopment involves the planning, design and delivery of a hospital designed to meet the needs of Griffith and surrounding communities both now and into the future. The project is being delivered in several phases. They include early and enabling works, currently underway on the health campus, and the delivery of a new multi-storey hospital as part of the main phase of works. **Support auditor.** Site visit, review of documentation and audit report.

Sydney Children's Hospital Stage 1 and Minderoo Children's Comprehensive Cancer Centre Audit (NSW Government), Randwick NSW

The \$658 million Sydney Children's Hospital Stage 1 and Minderoo Children's Comprehensive Cancer Centre brings world-leading clinical care, research and education together under one roof, to transform kids' health. The Project will be delivered as a single project in an integrated facility, to transform paediatric health care locally, nationally and globally. **Support auditor.** Audit plan, site visit, review of documentation and audit report.

Forbes Brinecure Annual Compliance Reporting (Loris H Hassall), Forbes NSW

Forbes Brinecure is a tannery that processes cattle hides. Up to 311,000 cattle hides are processed each year. **Project Manager.** Data analysis and reporting for the Annual System Performance Report in compliance with the Environmental Protection Licence. Data analysis included soil, brine, pasture and nutrient balance.

Geelong Leather Annual Compliance Reporting (Loris H Hassall), Culcairn NSW

Geelong Leather is a tannery that processes cattle hides and kangaroo skins. Geelong Leather produce a high quality 'wetblue' leather product that is shipped around the world for the production of leather goods. **Project Manager.** Data analysis and reporting for the Annual System Performance Report in compliance with the Environmental Protection Licence. Data analysis included soil, groundwater, brine, sludge, pasture and nutrient balance.

Mining and resources

Tharbogang Landfill and Quarry Groundwater Compliance Reporting (Griffith Council), Tharbogang NSW

The proposed extension to the existing quarry; extracting, processing and transporting between 150,000 and 315,000 tonnes of quarry product by road per year, for up to 25 years; extending landfill operations. **Field technician and report author.** Analysis and reporting of annual groundwater monitoring data.

Mt Bundarbo Quarry (Bald Hill Quarry), Jugiong NSW

Construction of a hard rock quarry near Jugiong, NSW. The quarry will extract and process 100,00 to 150,000 tonnes per annum with peak demands of up to 450,000 tonnes per annum with material from the quarry supporting local development and maintenance. **Project Manager.** Delivery, authoring and management of the Environmental Impact Assessment (EIA) and associated documentation, as well as technical advice and client contact.

Murray's Crossing Quarry (Bald Hill Quarry), Tumbarumba NSW

An existing hard rock quarry seeking to increase extraction to 100,000 tonnes per annum with peak periods of 200,000 tonnes per annum over a period of 25 years, with material from the quarry supporting local development and maintenance. **Project Manager.** Delivery, authoring and management of the Environmental Impact Assessment (EIA) and associated documentation, as well as technical advice and client contact. Collection of water quality samples.

Government

Bomen RiFL (Wagga Wagga City Council), Wagga Wagga NSW

Construction of the multi-million-dollar Riverina Intermodal Freight and Logistics (RiFL) Hub at Bomen in Wagga Wagga has marked another milestone, with more than one million individual pavers laid over 26,000 square metres for the terminal base. **Erosion and Sediment Control Audit.** Site visit and audit report of on-site erosion and sediment controls.

6. Appendices

Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Griffith Base Hospital Redevelopment
Consent Number	SSD-9838218
Description of Project	Redevelopment of Griffith Base Hospital
Project Address	5-39 Animoo Avenue, Griffith NSW
Proponent	Health Administration Corporation
Date	20 December 2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

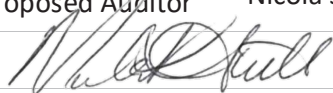
- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor Nicola Smith

Signature



Qualification Bachelor Science, Masters of Philosophy (Phys Geog)

Company NGH Pty LTD

Appendix B DPE Lead Auditor Approval

Our ref: SSD-9838218-PA-32

Ms Kathryn Saunders

Senior Planning Advisor

Health Infrastructure

1 Reserve Road

ST LEONARDS NSW 2065

27/10/2023

Sent via the Major Projects Portal only

Dear Ms Saunders

Griffith Base Hospital Redevelopment (SSD 9838218)

Independent Auditors 2023

I refer to your letter dated 26 October 2023, seeking the agreement of the Planning Secretary of the Department of Planning and Environment ("the department") of the suitability of the Auditors' qualifications, experience and independence to undertake an independent audit of the Griffith Base Hospital Redevelopment ("the development"), in accordance with Schedule 2, Condition C39 of the SSD 9938218 ("the consent").

Having considered the qualifications and experience of Ms Natascha Arens, Mr Will Weir and Ms Nicola Smith ("the audit team"), the Planning Secretary endorses the appointment of the audit team to undertake the audit in accordance with Condition C39 of the consent. This approval is conditional on the audit team being independent of the development and maintaining Exemplar Global certification. The department reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the Department's Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

Appendix C Audit table

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
Part A - Administrative Controls					
Obligation to Minimise Harm to the Environment					
A1.		In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	Site Inspection	The Project site was observed by the auditor to be well managed at the time of the audit and not considered to present a potential risk of causing material harm to the environment.	Compliant
Terms of Consent					
A2.		The development may only be carried out:			Non compliant
	a)	in compliance with the conditions of this consent;	Site inspection Document review	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.	
	b)	in accordance with all written directions of the Planning Secretary;	Interview - A Galvin		
	c)	generally in accordance with the EIS, Response to Submissions	Site inspection Document review	Works are being delivered genrally in accordance with the EIS and Response to Submissions.	
	d)	generally in accordance with the section 4.55 modification application (SSD-9838218-Mod-1) document titled Griffith Base Hospital Section 4.55(1A) Modification Report, prepared by Urbis and dated 21 September 2023; and			
	e)	in accordance with the approved plans in the table below:	Approved Plans Crown Certificate 1 - CC4	Works were being delivered in accordance with the approved plans at the time of the audit.	
A3.		Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:			Not triggered
	a)	the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary;			
	b)	any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and			
	c)	the implementation of any actions or measures contained in any such document referred to in (a) above.			
A4.		The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted	Not triggered
Limits of Consent					
A5.		This consent lapses five years after the date of consent unless work is physically commenced.	Griffith Hospital Stage 2 Redevelopment Contract Programme 11.02.22 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022	Construction work commenced on 4 May 2022	Compliant
Prescribed Conditions					
A6.		The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	Crown Certificate 1 Crown Certificate 2 Crown Certificate 3 Crown Certificate 4	The project is subject to a Crown Certificate. The Certificates includes verification of compliance with relevant building codes.	Compliant
Planning Secretary as Moderator					
A7.		In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Interview - A Galvin	No disputes raised at the time of the fourth audit.	Not triggered
Evidence of Consultation					
A8.		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.	Sighted consultation email from ADCO to Griffith City Council, dated 12/10/2023 Sighted consultation email from ADCO to Griffith City Council regarding SSDA Modification 2, dated 1/11/2023	Consultation email from ADCO to Griffith City Council pursuant to conditions B31 and B34, dated 12/10/2023	Compliant
Staging					
A9.		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).	Construction Staging Report - Griffith Base Hospital Redevelopment - SSD-9838218 - Rev 3 Approval of Plan SSD-9838218-PA-3, 16/06/2022 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022	Construction - demolition works were commenced 4 May 2022. The first Staging Report Rev No. V0 is dated 26 April 2022 and as such did not meet the requirement to be submitted one month prior to the commencement of construction and therefore, was raised as a NC at the first audit. It was subsequently prepared and accepted by the Planning Secretary. As of Audit 4, the Staging Report is still in Rev 3 and has been approved by the Planning Secretary.	Compliant
A10.		A Staging Report prepared in accordance with condition A9 must:			
	a)	if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;	Construction Staging Report - Griffith Base Hospital Redevelopment - SSD-9838218 - Rev 3	Details of proposed construction staging is adequately addressed.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);	As above		Compliant
	c)	specify how compliance with conditions will be achieved across and between each of the stages of the project; and	As above	APPENDIX B – CONDITION COMPLIANCE of the Construction Staging Report adequately addresses how compliance will be achieved across stages.	
	d)	set out mechanisms for managing any cumulative impacts arising from the proposed staging.	As above	Cumulative impacts have been addressed as not likely to be incurred.	
Legal Notices					
A11.		Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Site Inspection Interview A. Galvin	Rev 3 is current. Stage 2A and Stage 2B works had not been commenced at the time of the fourth site audit.	Compliant
A12.		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.	Griffith Hospital Stage 2 Redevelopment Contract Programme 11.02.22 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022 Interview A. Galvin	The Staging Plan indicates that the timing for Stage 2A and Stage 2B is January 2023 to 2025, and for Stage 3, September 2023 to 2025. As construction is still in Stage 1, it is recommended the Staging Plan be updated to reflect accurate timings.	Compliant
Staging, Combining and Updating Strategies, Plans or Programs					
A13.		The Applicant may:			Compliant
	a)	prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program);			
	b)	combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and			
	c)	update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Document review Interview A. Galvin	ENVIRONMENTAL MANAGEMENT PLAN (EMP), Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V4, dated 14/12/2023). Section 11.3.1 of the updated EMP (V4) addresses personnel changes in the full construction phase of the Project.	
A14.		Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	Interview S. Cincotta Post Approval receipt of EMP (v4) submission to DPE EMP (v4) submission to DPE cover letter from HI to DPE, dated 18/12/2023 DPE acknowledgement email that the EMP (V4) had been received, dated 18/12/2023	The EMP has been updated in the fourth audit period to Rev 4 to reflect personnel changes and was submitted to the Planning Secretary on 18/12/2023 through the post Approval Portal.	Compliant
A15.		If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.		Noted	Not triggered
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.	ENVIRONMENTAL MANAGEMENT PLAN (EMP), Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V4, dated 14/12/2023) Site Inspection Interview - A. Galvin	During the fourth audit, works were generally being delivered in accordance with the current management plans and strategies.	Compliant
Structural Adequacy					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
A17.		All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.	Crown Certificate 1 BCA CROWN CERTIFICATE - 2, CRO-22068, 01 September 2022 BCA Crown Certificate - 3, CRO-22114, 17 March 2023 BCA Crown Certificate - 4, CRO-23021, 19 June 2023 Sighted DJRD Architects letter dated 26 August 2022 Architectural Design Certificate Sighted structural Design Certification – CC5 (Rev 1), Acor Consultants, 3 October 2023	The Crown Certificates confirm compliance with the relevant BCA where relevant. Crown Certificate 5 documentation has been submitted but not yet approved.	Compliant
		Notes: • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.			
The External Walls and Cladding					
A18.		The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	BCA Crown Certificate - 3, CRO-22114, 17 March 2023 Interview - A. Galvin	Crown Certificate 3 confirm compliance with the relevant BCA for Façade and roofing works.	Compliant
External Materials					
A19.		The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided:	BCA Crown Certificate - 3, CRO-22114, 17 March 2023 Interview - A. Galvin	Crown Certificate 3 confirm compliance with the relevant BCA for Façade and roofing works including external colours, materials and finishes. Changes to façade denoted in SSDA Mod 1.	Compliant
	a)	the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials		As above	
	b)	the quality and durability of any alternative material is the same standard as the approved external building materials; and		As above	
	c)	a) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.		As above	
Applicability of Guidelines					
A20.		References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Crown Certificate 1 Crown Certificate 2 Crown Certificate 3 Crown Certificate 4 Interview - A Galvin		Compliant
A21.		Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Interview - A Galvin		Not triggered
Monitoring and Environmental Audits					
A22.		Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing.		Noted	Not triggered
		Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.			
Access to Information					
A23.		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:			
	a)	make the following information and documents (as they are obtained or approved) publicly available on its website:	Website https://gbhredevelopment.health.nsw.gov.au/ssda-documents	The auditor notes that all documentation is up to date on the Project website.	
	(i) i)	the documents referred to in condition A2 of this consent;	As above	The auditor notes that all documentation referred to in condition A2 of this consent is published on the Project Website.	
	(ii) ii)	all current statutory approvals for the development;	As above		
	(iii) iii)	all approved strategies, plans and programs required under the conditions of this consent;	As above	The auditor found that the Project website contains all approved documentation required under the conditions of this consent (although this did not occur prior to construction) including the: Remediation Works Sub-plan Environmental Management Plan Rev 4 Demolition Management Sub-plan Construction Noise and Vibration Management Sub-plan Construction Traffic Management Sub-plan Construction Waste Management Sub-plan	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	(iv) 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;	As above	The auditor found that the Project website contained reporting of environmental performance at the time of the fourth site audit, which included Environmental Monitoring Reports 1 (April - November 2022), 2 (December 2022 - January 2023), 3 (February 2023), 4 (March - April 2023) and 5 (May 2023 to November 2023).	Compliant
	(v) 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;	As above	The auditor found that the Project website contained monitoring results at the time of the fourth site audit and included the Noise and Vibration Monitoring Report 1 (June - November 2022), 2 (December 2022 - January 2023), 3 (February 2023), 4 (March - April 2023), 5 (May 2023), 6 (June 2023), 7 (July 2023 to September 2023).	
	(vi) vi)	a summary of the current stage and progress of the development;	As above	Main Works summary, Newsletters and Staging Report were provided on the website at the time of the fourth audit. April 2022, July 2022, October 2022, January 2023 and April 2023, July 2023 and October 2023 Newsletters on website at the time of the fourth audit.	
	(vii) vii)	contact details to enquire about the development or to make a complaint;	As above	Media contact details are provided for project information, along with an email address for making complaints.	
	(viii) viii)	a complaints register, updated monthly;	Interview - A Galvin As above	No complaints were registered at the time of the fourth audit. ADCO maintains its own register for complaints. The complaints register is accesible from the Project website.	
	(ix) ix)	audit reports prepared as part of any independent audit of the development and the Applicant’s response to the recommendations in any audit report;	As above	The auditor found at the time of the fourth audit, the IEA reports for the first, second and third audits, and the corresponding Applicant's Responses, are available on the project website.	
	(x) x)	any other matter required by the Planning Secretary; and	As above		
	b)	keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	As above		
Compliance					
A24.		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.	HSE Project Specific Induction Griffith Base Hospital Redevelopment ADCO Induction (Corporate)	The site induction has been updated to include information regarding key environmental risks and requirement to comply with the conditions of approval. Updated frequently. Latest revision is V11 dated 22 September 2023 and updated to reflect personnel changes.	Compliant
Incident Notification, Reporting and Response					
A25.		The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	Interview - A Galvin Post Approval notification to report incident sighted Post Approval notification and cover letter for submission of incident report sighted, dated 23 August 2023 Sighted Incident report, dated 15/08/2023	A concrete line (pipe) attached to a mobile concrete pump failed (cracked) while pouring columns to Level 1. The mobile concrete pump was set up on the western area of Site. SafeWork NSW will be notified. HI was notified of the incident on 14/08/2023. Incident report is available on the Major Projects website. The cover letter for the incident report is also available on the Major Projects website, dated 23 August 2023. The incident response letter from DPE identifies that the DPE had no further response regarding the incident, 18/08/2023.	Compliant
A26.		Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Sighted email correspondence between HI and DPE, 6/9/2023 Sighted incident response letter and email from DPE, 18/08/2023 Sighted Incident report, dated 15/08/2023	Email consultation from HI and DPE regarding the minor nature of the incident notified, dated 6 September 2023 and a response from DPE agreeing that the requirement to adhere to Appendix 2 of the SSD-10353 was not necessary given the information already provided. The incident response letter from DPE identifies that the DPE had no further response regarding the incident, 18/08/2023.	Compliant
Non-Compliance Notification					
A27.		The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	Interview - A Galvin, S Cincotta Sighted post approval portal notification of 11 non-compliances received in IEA 3 Sighted DPE email acknowledgement that the non-compliance notification of 11 non-compliances was received, dated 15/08/2023	Post approval receipt and DPE acknowledgement of non-compliance notification of the 11 non-compliances received in IEA 3, dated 15/08/2023, within 7 days of identification.	Compliant
A28.		The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Interview - A Galvin, S Cincotta	Proponent’s Response (12/09/2023) outlines the non-compliance, the condition, why it is non-compliance, the Applicant’s response and timing of corrective actions.	Compliant
A29.		A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview - A Galvin, S Cincotta	Noted	Compliant
Revision of Strategies, Plans and Programs					
A30.		Within three months of:			
	a)	the submission of a compliance report under condition A33;		Compliance reporting under condition A33 has not been triggered at the time of Audit 4.	
	b)	the submission of an incident report under condition A26;	Interview - A Galvin	A notification of review of strategies, plans or programs was not issued to the Planning Secretary or Certifier within three months of the Incident Report, dated 15/08/2023.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	c)	the submission of an Independent Audit under condition C42 or C43;	Sighted Cover Letter from HI to DPE regarding review notification, dated 18/08/2023 Sighted Post Approval receipt of notification Email from DPE acknowledging notification, dated 21/08/2023	HI notified DPE via the Post Approval Portal that a review is being carried out on the strategies, plans and programs under this consent in accordance with A30(c). DPE acknowledged the notificaiton on 21/08/2023, within 3 months of the submission of IEA 3 and Proponent's Response. A notfication of review of strategies, plans or programs was not issued to the Certifier.	Non compliant
	d)	the approval of any modification of the conditions of this consent; or	Interview - A. Galvin, S. Cincotta	A notfication of review of strategies, plans or programs was not issued to the Planning Secretary or Certifier following the determination of Mod 1 on 28 September 2023.	
	e)	the issue of a direction of the Planning Secretary under condition A2 which requires a review,	Interview - A Galvin, S. Cincotta	Not triggered	
		<i>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</i>			
A31.		If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review.	Interview - A Galvin, S. Cincotta	As of the fourth audit there were no plan updates to cater for improved environmental performance, a modification or any directions.	Not triggered
		<i>Note:This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>			
Compliance Reporting					
A32.		Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements.	Compliance Reporting - POST APPROVAL REQUIREMENTS, DPIE, May 2020	No Compliance Reporting - Post Approval Requirements for construction phase of Project.	Not triggered
A33.		Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements, unless otherwise agreed by the Planning Secretary.	As above		Not triggered
A34.		The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	As above		Not triggered
A35.		Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements, the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.		Noted	Not triggered
Part B - During Construction					
Notification of Commencement					
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.	Letter to DPE - notifying commencement of construction, Health Infrastructure, dated 20 June 20/6/2022 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022 Letter to DPE - renotifying commencement of construction, Health Infrastructure, dated 14 April 2023	This is a raised non compliance from audit 1 as no audit evidence provided for first audit of notification in writing to the Planning Secretary of the planned date of commencement of construction. 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. HI renotified the DPE on 14 April 2023 of the correct commencement of construction date of 4 May 2023.	Not triggered
B2.		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.		Construction is still in stage 1 as of the fourth audit.	Not triggered
Certified Drawings					
B3.		Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent	Crown Certificate 1 Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022	Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022 submitted prior to commencement of construction.	Compliant
External Walls and Cladding					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
B4.		Prior to the commencement of façade construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	Sighted Aconex email with statement as evidence of compliance with this condition and acceptance from the Certifier, dated 4 April 2023. Interview - A Galvin	Sighted notification of lodgement. HI received 4 April 2023, HI submitted to Planning Secretary through portal 5 April 2023. Construction is still under CC4 design certificate at the time of the fourth audit.	Compliant
Pre-Construction Dilapidation Report – Protection of Public Infrastructure					
B5.		Prior to the commencement of construction, the Applicant must:			Compliant
	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;	Application under Section 68 of the Local Government Act at 35 NOOREBAR AVENUE GRIFFITH 2680, dated 28 April 2022 Crown Certificate 2 Sighted email from HI with correspondence between Council and others regarding the S68 approval for sewer, dated 3 June 2021.	Council consulted regarding s68 approval in 2021. Section 68 application and evidence of submission to Council provided for Crown Certificate 2. It is noted that Council confirmed receipt of Section 68 Documents in June 2022 after commencement of construction. Letters to neighbours (including St Vincent’s Private Community Hospital) put in their letter boxes on 11 April 2022. Council consulted prior to 28 April 2022.	
	b)	prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non- residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;	PRE CONSTRUCTION CONDITION SURVEY - External, AUDILAPS, (ADN22136A), 19 April 2022 PRE CONSTRUCTION CONDITION SURVEY - Council, AUDILAPS, (ADN22136B), 19 April 2022	The surveys assess infrastructure and assets in the vicinity of the Project.	
	c)	submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and	Crown Certificate 1 Crown Certificate 2	Aconex email correspondence sighted by the auditor regarding provision of dilapidation reports in compliance with SSDA Condition B5.	
	d)	prepare a report by a professional engineer detailing the proposed methods of excavation, shoring or pile construction, including details of potential vibration emissions, and demonstrating the suitability of the proposed methods of construction to overcome any potential damage to nearby premises including the residences on the south side of Magill Street and the heritage item at no.4 Hay Street, Randwick.	Crown Certificate 1 Bulk Earthworks Design, ACOR Consultants Pty Ltd, 12 April 2022 Construction Noise and Vibration Management Sub-Plan (CNVMP), E-Lab Consulting, dated 28 June 2022 Aconex mail - E-Lab consulting, 20 May 2022	E-Lab conform that as per Section 6 of the CNVMP all residential receiver are outside the safe distance for cosmetic damage.	
	e)	provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested	Interview - J Innes	No request made by Planning Secretary	
Pre-Construction Survey – Adjoining Properties					
B6.		Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential buildings that are likely to be impacted by the development.	Correspondence from E-LAB Consulting dated 23 May 2022	Correspondence confirming residential receivers not considered likely to be impacted by vibration to cause cosmetic damage.	Not triggered
B7.		Where the offer for a pre-construction survey is accepted (as required by condition B6), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.			Not triggered
B8.		Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B7, the Applicant must:			Not triggered
	a)	provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey			
	b)	submit a copy of the Pre-Construction Survey Report to the Certifier; and			
	c)	provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.			
Ecologically Sustainable Development					
B9.		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.	Statement of Compliance with DA Condition B9, E-Lab dated 14 April 2022	Condition finding updated based on revised construction commencement date.	Compliant
B10		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.	Statement of Compliance with DA Condition B10, E-Lab dated 14 April 2022	As above	Compliant
Heritage - Interpretation Strategy					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
B11.		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:	Griffith Base Hospital - Heritage Interpretation Strategy, 21 November 2021 Griffith Base Hospital - Interpretation Plan, djrd architects, 03/06/22	The Interpretation Plan addresses Condition B11 but was not prepared and submitted prior to the commencement of construction.	Compliant
	a)	Foundation stone and plaque dated 1931; and	As above	Foundation stone is addressed	
	b)	any other plaques, statutes, commemorative plaques, artefacts etc.	As above	Other plaques are addressed	
<u>Heritage Photographic Archival Recording</u>					
B12.		Prior to the commencement of demolition of Building 17 (Specialist Clinics 2), Building 19 (Biomedical Building), Building 20 (Dietetics Building) and Building 28 (CPAC), a photographic archival record of the buildings must be prepared in accordance with the NSW Heritage Branch guidelines titled Photographic Recording of Heritage Items using Film or Digital Capture. A digital copy must be submitted to Council, any relevant local studies collection in the locality and the Planning Secretary prior to the commencement of demolition.	Interview - A Galvin, S Cincotta	Stage 2 works activities have not started.	Not triggered
<u>Outdoor lighting</u>					
B13.		Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Interview - A Galvin, S Cincotta Stantec CC5 Electrical services Certificate of Design – Electrical, 21 August 2023	Electrical certificate that outdoor lighting complies with the code and Australian Standard submitted with CC5.	Not triggered
<u>Demolition</u>					
B14.		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 compliance must be submitted to the Certifier and Planning Secretary.	Demolition Management Plan and Methodology, 1 Noorebar Avenue. Griffith, NSW, 2680 (MOITS, undated) Statement of Safety Compliance with AS2601-2001 (Moits, undated) DPIE submission receipt - SSD-9828218-PA-8 (undated) Crown Certificate 2 Correspondence to Certifier with submission of CC1 documents. Letter from DPE regarding approval of Staging Report Rev 3 June 2022.	Crown Certificate 1 documents submitted to Certifier on 2 May 2022 (ADCO Con- GCOR-000443) prior to the commencement of demolition on 4 May 2022. Documents submitted to DPE as Appendix in Staging Plan submission (SSD-9838218-PA-3), which was submitted on in June 2022 following commencement of construction. Crown Certificate 2 confirms that the documents were submitted 13 July 2022 after the commencement of construction.	Compliant
<u>Environmental Management Plan Requirements</u>					
B15.		Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).		The suite of management plans reviewed generally address relevant guidelines including that stated in the conditions.	
		<i>Note:</i> - The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval - The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.			Compliant
<u>Construction Environmental Management Plan</u>					
B16.		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:	ENVIRONMENTAL MANAGEMENT PLAN (EMP), Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V4, dated 14/12/2023) Crown Certificate 1 Environmental and Waste Management Plan, Version 2.0, MOITS, dated May 2022 Interview Post Approval receipt of EMP (v4) submission to DPE EMP (v4) submission to DPE cover letter from HI to DPE, dated 18/12/2023 DPE acknowledgement email that the EMP (V4) had been received, dated 18/12/2023	CEMP now includes all the requirements and is compliant, noting that in audit 1 it was non compliant due to missing the submission time frame prior to construction commencement. The EMP has been updated in the fourth audit period to Rev 4 to reflect personnel changes and was submitted to the Planning Secretary on 18/12/2023 through the post Approval Portal.	Compliant
	a)	Details of:			
	(i)	hour of work;	As above	Approval process was undertaken for crane removal, refer to condition C7. No other requirements for a change in operating hours.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	(ii)	24-hour contact details of site manager;	As above	Principal Contractor Details include company office number only. The 24 hour 1800 contact number is provided on the site signage. The EMP V4 includes the Site Manager 24-hours contact details.	Compliant
	(iii)	management of dust and odour to protect the amenity of the neighbourhood;	As above	Dust and fumes are addressed only, along with other housekeeping to reduce potential for odours.	
	(iv) i)	stormwater control and discharge;	As above	Sediment controls and on-site water management adequately addressed.	
	(v) ii)	measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;	As above	Addressed under waste removal and disposal.	
	(vi) iii)	groundwater management plan including measures to prevent groundwater contamination;	As above	Spill management is addressed, however no specific groundwater management plan included. Section 11.3.6 of the updated EMP (V4) addresses groundwater management.	
	(vii)	external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	As above	External lighting compliance is not addressed Section 11.3.12 of the updated EMP (V3) addressed external lighting compliance.	
	b)	an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;	As above	Not addressed in EMP, however it is addressed in the Environmental and Waste Management Plan for the earthworks stage. Section 11.3.16 of the updated EMP (V4) addresses unexpected contamination finds.	
	c)	an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	As above	Not addressed in EMP, however is addressed in the AACHMP. Section 11.3.17 of the updated EMP (V4) addresses unexpected heritage finds	
	d)	Construction Traffic and Pedestrian Management Sub-Plan (see condition B17);	Construction Traffic Management Plan, ptc., 21 June 2022	Refer B17 below.	
	e)	Construction Noise and Vibration Management Sub-Plan (see condition B18); and	Construction Noise and Vibration Management Sub-Plan, E-Lab Consulting, dated 28 June 2022	Refer B18 below.	
	f)	Construction Waste Management Sub-Plan (see condition B19).	Environmental and Waste Management Plan, Version 2.0, MOITS, dated May 2022.	Refer B19 below.	
B17.		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:	Construction Traffic Management Plan (CTMP), Rev 6, ptc., 28 November 2022		Compliant
	a)	be prepared by a suitably qualified and experienced person(s);	As above	ptc. Suitably qualified and experienced - Dan Budai (SafeWork NSW Card No. TCT0016805 (PWZ))	
	b)	be prepared in consultation with Council and TfNSW;	As above	CTMP Rev 6 outlines the consultation process with Council and TfNSW.	
	c)	detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and	As above	Adequately addressed in CTMP	
	d)	detail heavy vehicle routes, access and parking arrangements.	As above	Adequately addressed in CTMP	
B18.		The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:	Construction Noise and Vibration Management Sub-Plan (CNVMP), E-Lab Consulting, dated 28 June 2022 (Rev 4)		Non compliant
	a)	be prepared by a suitably qualified and experienced noise expert;	As above	E-Lab Consulting, Acoustic and Vibration Engineers (CVs provided with CNVMP)	
	b)	describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);	As above	Section 4 Project Noise and Vibration Criteria	
	c)	describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;	As above	Section 7 of the CNVMP	
	d)	include strategies that have been developed with the community for managing high noise generating works;	Sighted redacted meeting minutes with St Vincent's Private Community Hospital, dated 20 April 2022. As above	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. As of the fourth 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. Redacted meeting minutes allude to Noise and Vibration being discussed.	
	e)	describe the community consultation undertaken to develop the strategies in condition B18(d);	As above	The CNVMP does not describe any consultation undertaken with the community. As of the fourth 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.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	f)	include a complaints management system that would be implemented for the duration of the construction; and	As above	Addressed in Section 7.3 of the CNVMP	
	g)	include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures.	As above	Addressed in Section 7.4 of the CNVMP	
B19.		The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:	Environmental and Waste Management Plan, MOITS, updated		Compliant
	a)	the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use; and	As above	<p>The Environmental and Waste Management Plan identifies expected waste categories created by demolition and excavation phase of the Project only and that waste will be managed in accordance with the Waste Minimisation and Management Act 1995. It does not include procedures for recording of quantities, classification or validation of materials.</p> <p>The EMP however does discuss the disposal of waste and reporting on details of quantities of materials that are recycled, reused or go to landfill. It also includes a procedural step for classifying any contaminated soil.</p> <p>A Waste Management Plan will need to be developed for the civil construction phase of the project.</p> <p>Section 11.3.1 of the updated EMP (V4) addresses waste management in detail for the full construction phase.</p>	
	b)	information regarding the recycling and disposal locations.	As above	<p>The Environmental and Waste Plan addresses recycling. The plan does not identify waste disposal locations.</p> <p>The EMP discusses disposal to appropriately licensed facilities.</p>	
Construction Parking					
B20.		Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	<p>Construction Traffic Management Plan, etc., 28 November 2022</p> <p>Site Inspection</p> <p>Interview - A Galvin</p>	Section 5.1.1 of the CTMP addresses staff parking with sufficient on-street parking within 400 m of the project site available to avoid patron and hospital staff parking areas. All heavy vehicle movements and deliveries will be drive-in and drive out with no on-street parking allowed in the hospital precinct.	Compliant
Soil and Water					
B21.		Prior to the commencement of construction, the Applicant must:			Compliant
	a)	install erosion and sediment controls on the site to manage wet weather events;	Site inspection	Adequate erosion and sediment control measure were observed by the auditor at the time of the audit.	
	b)	divert existing clean surface water around operational areas of the site; and	Site inspection	Clean water diversion are in place around the site.	
	c)	direct all sediment laden water in overland flow away from the leachate management system and prevent cross-contamination of clean and sediment or leachate laden water.	Site inspection	This condition appears to be in relation to a landfill development?	
B22.		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'.	Site inspection	<p>Erosion and sediment control measures in accordance with the Project ESCP were observed by the auditor at the time of the audit. However, measures and management of sediment leaving site remains problematic. Sedimentation was observed by the auditor in the gutter of Animoo Avenue, down-gradient of the site, at the time of the fourth audit.</p> <p>Refer to site inspection photographs.</p>	Non compliant
B23.		Prior to the commencement of construction, the Applicant must implement measures to manage Acid Sulfate Soils. These measures must include handling, treatment, monitoring of water quality at treatment areas and disposal of Acid Sulfate Soils.	Site inspection	The project site is not in a defined Acid Sulphate Soils Area.	Not triggered
Operational Noise – Design of Mechanical Plant and Equipment					
B24.		Prior to installation of mechanical plant and equipment:			Not triggered
	a)	a detailed assessment of mechanical plant and equipment must be undertaken by a suitably qualified person to demonstrate compliance with the relevant project noise trigger levels as recommended in the Noise and Vibration Impact Assessment dated 28 July 2021 and prepared by EMM; and			
	b)	evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the project noise trigger levels identified in the Noise and Vibration Impact Assessment dated 28 July 2021 and prepared by EMM.			
Aboriginal Heritage					
B25.		Prior to the commencement of construction, the Applicant must consult with Registered Aboriginal Parties to determine specific requirements and management measures to be used on site during construction, including protection of any objects or items in perpetuity.	<p>Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021</p> <p>DPIE Letter - Griffith Base Hospital Redevelopment (SSD 9838218)</p> <p>Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2</p>	Evidence of consultation provided.	Compliant
Heritage Management Plan - Aboriginal Heritage					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
B26.		Prior to the commencement of construction, the Applicant must submit a Heritage Management Plan to the satisfaction of the Planning Secretary. The plan must:	Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021 DPIE Letter dated 1 April 2022 Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2)	The AACHMP was submitted and approved by the Planning Secretary prior to the commencement of construction.	Compliant
	a)	be prepared by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary.	Letter dated 24/11/2021 - Griffith Base Hospital Redevelopment (SSD 9838218) Expert Appointment Endorsement - Condition B26(a) (ref: SSD 9838218)	Dr Jilliam Comber of Comber Consulting was endorsed by the Planning Secretary as a suitably qualified and experienced expert.	
	b)	be prepared in consultation with the Heritage NSW and Registered Aboriginal Parties	Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP)	Evidence of consultation provided in plan.	
	c)	describe how any unexpected finds would be managed.	As above		
	d)	include a map showing the SSD boundary, AHIP 4667 boundary and the extent of site 49- 2-0180. The purpose of the map will be to inform the approval pathway (SSD or AHIP) and management options, if Aboriginal objects are uncovered during works.	As above	Figure 5 - SSD Boundary Figure 7 Boundary of site 49-2-0180 Figure 8 - AHIP 4667 boundary	
	e)	include a description of the measures that would be implemented for:			
	(i)	a contingency plan and reporting procedure if previously unidentified heritage items are found or aboriginal skeletal material is discovered;	As above	Section 6.4.1 and 6.4.2	
	(ii)	ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and	As above	Section 6.4.3	
	(iii)	ongoing consultation with the Registered Aboriginal Parties during the implementation of the plan.	As above	Section 6.4.4	
	f)	include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	As above	Section 6.4.5	
<u>Heritage Interpretation Strategy and Plan – Aboriginal Heritage</u>					
B27.		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 experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.	Griffith Base Hospital - Heritage Interpretation Strategy, 21 November 2021 Griffith Base Hospital - Interpretation Plan, djrd architects, 03/06/22 DPIE Letter dated 24/08/2022 Griffith Base Hospital Redevelopment (SSD-9838218) Aboriginal Heritage Interpretation Strategy, Condition B27 GBH - Heritage Interpretation Delivery Plan (Betteridge Heritage 2023) Interview	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. The Griffith Base Hospital - Interpretation Plan (djrd architects 2022) applies only to built heritage as applicable to condition B11. The Aboriginal Heritage Interpretation Delivery Plan has been prepared for the development at the time of the fourth audit site inspection. The Plan was prepared by a Heritage Consultant of Betteridge Heritage and in consultation with DPE and RAPs. Attachment 1 of the Plan contains correspondence from DPE and Attachment 2, consultation with Registered Aboriginal Parties. Attachment 3 contains the minutes of the Aboriginal Consultation Group.	Compliant
<u>Biodiversity</u>					
B28.		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.	Letter dated 7 July 2022 - SSD-9838218 – Griffith Base Hospital Redevelopment - Biodiversity Certificate 6.33 - Payment Receipt, dated 16 May 2022	Payment receipted after commencement of construction on 16 May 2022.	Compliant
B29.		The requirement to retire like-for-like ecosystem credits and species credits in condition B28 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	As above		Compliant
B30.		Evidence of the retirement of credits in satisfaction of condition B28 or payment to the Biodiversity Conservation Fund must be provided to the Planning Secretary prior to commencement of construction.	As above	Certificate 6.33 – Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation.	Compliant
<u>Landscaping</u>					
B31.		Prior to the commencement of landscaping works, the Applicant must prepare a detailed Landscape Plan in accordance with the Landscape SSDA Report, prepared by Site Image, dated 21 September 2023 , to manage the revegetation and landscaping works on-site, to the satisfaction of the Certifier. The plan must:	Aconex correspondence with CC5 document submission, dated 15 December 2023 Updated design drawings.	The documentation was included in the CC5 document submission via Aconex to the Certifier, dated 15 December 2023. CC5 has not been approved as of fourth site audit.	
	a)	provide for the planting of 86 additional trees;	Consultation email to Council, dated 12/10/2023	There is a provision for 257 trees.	
	b)	detail the location, species, maturity and height at maturity of plants to be planted on-site;	Consultation email to Council, dated 12/10/2023	Captured in current documentation package.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	c)	include species (trees, shrubs and groundcovers) indigenous to the local area;	Consultaion email to Council, dated 12/10/2023	Captured in current documentation package.	Not triggered
	d)	include the provision of street tree planting. Species and spacing of trees to be determined in consultation with Council;	Consultaion email to Council, dated 12/10/2023	Referenced in Landscape SSDA Report and drawings. This was addressed in the consultation email to Council, dated 12/10/2023.	
	e)	include the provision of nest boxes suitable to native fauna likely to use the site; and	Consultaion email to Council, dated 12/10/2023 Email from Abel Ecologist with nest box specifications, dated 4/10/2023	Two types of nest boxes have been allowed for. One for small parrots and the other, a triple chamber box for microbats.	
	f)	be submitted to the Planning Secretary for information.		Not triggered until CC5 is approved	
Construction Access arrangements					
B32.		Prior to the commencement of construction, evidence of compliance of construction parking and access arrangements with the following requirements must be submitted to the Certifier:	Crown Certificate 1 Construction Traffic Management Plan, etc., 21 June 2022		Compliant
	a)	all vehicles must enter and leave the hospital site in a forward direction;	Interview - J Innes CTMP		
	b)	the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, is in accordance with the latest version of AS 2890.2; and	Interview - J Innes CTMP		
	c)	the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, has been addressed, applying best practice in road	Interview - J Innes CTMP		
Operational Access, Car Parking and Service Vehicle Arrangements					
B33.		Prior to the commencement of construction of operational parking and access facilities, evidence of compliance of the design of operational parking and access arrangements with the following requirements must be submitted to the Certifier:	Sighted Letter from PTC to ADCO confirming that the proposed access and parking meets the requirements of Condition B33, CC5, dated 13 September 2023 Aconex correspondence with CC5 document submission, dated 15 December 2023	The documentation was included in the CC5 document submission via Aconex to the Certifier, dated 15 December 2023.	Compliant
	a)	a minimum of 357 on-site car parking spaces for use during operation of the development and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and	As above		
	b)	the swept path of the largest service vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.	As above		
Public Domain Works					
B34.		Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier.	Email consultation with Griffith City Council, dated 12/10/2023 Aconex correspondence with CC5 document submission, dated 15 December 2023	Email consultation from ADCO to Griffith City Council for landscape drawings of Griffith Hospital, which had been updated to address B31 and B34, for Council's review and acceptance. The documentation was included in the CC5 document submission via Aconex to the Certifier, dated 15 December 2023.	Compliant
Site Contamination					
B35.		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.	ADCO Letter dated 26 April 2022, LETTER OF INTENT -SITE ENVIRONMENTAL AUDITS	Updated based on confirmed construction commencement date of 4 May 2022. Site auditor engaged prior commencement of construction. Site higeneist Steve hardy undertakes site audit where required. Nothing uncovered since last audit, even with south-west excavations.	Compliant
Part C - During Construction					
Site Notice					
C1.		A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of inf orming the public of project details and must satisf y the following requirements:	Site Inspection	The site notice was observed by the auditor, refer to site photographs. It has been updated to relfect the change in personnel during the fourth audit period.	Compliant
	a) i)	minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;	Site Inspection	The signage addresses this condition, refer to site photographs	
	b) ii)	the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;	Site Inspection	The signage addresses this condition, refer to site photographs	
	c) iii)	the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the 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); and	Site Inspection	The signage does not include the approved hours of work. At the time of the third audit the signage included the construction hours.	
	d) iv)	the site notice(s) must be mounted at eye level on the perimeter hoardings/ fencing and must state that unauthorised entry to the site is not permitted.	Site Inspection	The signage addresses this condition, refer to site photographs	
Operation of Plant and Equipment					
C2.		All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	Site Inspection Hammertech plant maintenance tracking system Interview - A. Galvin, S. Cincotta	All plant and equipment is registered and tracked, including maintenance requirements via a digital system as observed by the auditor. All plant and equipment operating at the time of the audit appeared in good working condition. Hammertech has an up to date record of what plant and equipment are on site. Sighted in Hammertech the Manatau Telehandler seen during the site visit (0034). Hammertech profile included photo. Last service 22 November 2023. This piece of plant was photographed on-site, refer to site inspection photos.	Compliant

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
Demolition					
C3.		Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B14.	BCA - 1, CRO-22066, 28 June 2022 Safety Compliance Statement, MOITS, undated	Stage 2 works have not started.	Not triggered
Construction Hours					
C4.		Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:			Compliant
	a)	between 7am and 6pm, Mondays to Fridays inclusive; and	Interview - A Galvin, S Cincotta	No works outside these hours other than crane removal on the weekend of 4 and 5 November 2023, which was approved through the DPE process.	
	b)	between 8am and 1pm, Saturdays.	As above		
C5.		Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:			Not triggered
	a)	between 6pm and 7pm, Mondays to Fridays inclusive; and	As above		
	b)	(a) between 1pm and 4pm, Saturdays.	As above		
C6.		Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:			Compliant
	a)	by the Police or a public authority for the delivery of vehicles, plant or materials; or			
	b)	in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or			
	c)	where the works are inaudible at the nearest sensitive receivers;			
	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	Out of Hours Work application - dismantling of tower crane within site compound DPE approval letter for OOHW, dated 25 October 2023 Sighted community notification works notification, dated October 2023. Aconex transmittal notification of letterbox drops, dated 10/10/2023	Sighted community consultation notice regarding removal of the tower crane to occur on 4 and 5 November 2023, dated October 2023. The letterbox drop was done by ADCO representative on 10 October 2023, more than 7 days prior to crane removal works.	
	e)	where a variation is approved in advance in writing by the Planning Secretary or their nominee if appropriate justification is provided for the works.	Interview - A Galvin		
C7.		Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Interview - A Galvin Aconex transmittal notification of letterbox drops, dated 10/10/2023	The letterbox drop for OOHW crane removal was done by ADCO representative on 10 October 2023, more than 7 days prior to crane removal works.	Compliant
C8.		Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:			Compliant
	a)	9am to 12pm, Monday to Friday;	Interview - A Galvin CNVMP	No works of this nature occurring during the fourth audit period.	
	b)	2pm to 5pm Monday to Friday; and	As above		
	c)	9am to 12pm, Saturday.			
Implementation of Management Plans					
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).	EMP (V4) Hammertech Environmental Monitoring Report July 2023 to November 2023 Site Inspection	In accordance with the CEMP, weekly inspections are being undertaken and recorded in the Hammertech system. The auditor noted a non-compliance, for example, on 13/5/2023 sediment control logs were deteriorating and required replacement, this was closed out on 18/05/2023. In accordance with section 11.3.6 of the CEMP, measures are required to manage the impact of soils on nearby roads and surface water quality etc. The auditor observed the following during the fourth audit: - Sedimentation in the gutter down-gradient of the site access of Animoo Avenue - Community consultation for NVMP mitigation measures not carried out - Asbestos soil remediation works not done in accordance with the RAP. Refer to site inspection photographs.	Non compliant
Construction Traffic					
C10.		All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping unless directed by traffic control.	CTMP Site Inspection	Project construction vehicles were not observed in the contractor parking exclusion areas during the site inspection of the fourth audit. Refer to site inspection photographs for the fourth audit.	Compliant
Hoarding Requirements					
C11.		The following hoarding requirements must be complied with:			Compliant
	a)	no third-party advertising is permitted to be displayed on the subject hoarding/fencing; and	Site Inspection	No third-party advertising was observed by the auditor at the time of this audit.	
	b)	the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.		No graffiti was observed by the auditor at the time of this audit.	
No Obstruction of Public Way					
C12.		The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, ref use, skips or the like, under any circumstances.	Site inspection	No obstructing materials were observed by the auditor at the time of the audit.	Compliant
Construction Noise Limits					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
C13.		The development must be constructed to achieve the construction noise management levels detailed in <i>the Interim Construction Noise Guideline</i> (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	CNVMP Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt, July to September 2023. Interview - A. Galvin	Monitoring for compliance with noise limits is occurring. This information is collected in real time with data recorded in a environmental monitoring system (asBuilt Vault) which has the capability to alert exceedance of monitoring criteria. Environmental reports can also be prepared drawing from the system. The auditor sighted summary environmental reporting for July 2023 to November 2023 at the time of the fourth audit. These reports are also available on the Project's website. There were no noise exceedances during the fourth audit period.	Compliant
C14.		The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4 unless allowed by condition C5.	CNVMP Interview -A Galvin	Addressed in the CNVMP. The auditor was advised that construction vehicles do not arrive outside of construction hours and currently use a booking sytem for deliveries.	Compliant
C15.		The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	Interview - A Galvin Site Inspection		Compliant
Vibration Criteria					
C16.		Vibration caused by construction at any residence or structure outside the site must be limited to:			
	a)	for structural damage, the latest version of <i>DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999)</i> ; and	CNVMP Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt September 2023 Interview - A Galvin	Monitoring for compliance with vibration limits is occurring. This information is collected in real time with data recorded in a environmental monitoring system (asBuilt Vault) which has the capability to alert exceedance of monitoring criteria. Environmental reports can also be prepared drawing from the system. The auditor sighted summary environmental reporting for July to November 2023 at the time of the fourth audit. These reports are also available on the Project's website. No vibratory are currently occurring.	Compliant
	b)	for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: a technical guideline</i> (DEC, 2006) (as may be updated or replaced from time to time).	CNVMP	As above	
C17.		Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.	CNVMP Interview a Galvin	Addressed in the CNVMP - residential receivers are located beyond 30 metres from the site boundary.	Compliant
C18		The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B16 of this consent.		Noted	Not triggered
Tree Protection					
C19.		For the duration of the construction works:			
	a)	street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property;	Tree Management & Protection Plan, Revision: B, 12 April 2022. Arboricultural Advice CPS, 26/04/2023. Site Inspection Interview - A. Galvin	Addressed in plan. Tree protection was observed to be in place at the time of the audit. Refer to site inspection photographs. Mod 1 was determined. CPS Arboricultural Advice was provided in a letter, dated 26/04/2023, that was appended to the Arboricultural Impact Assessment (CPS 2021).	Compliant
	b)	all street trees not approved for removal must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction Council;	As above	As above	
	c)	(a) all trees on the site that are not approved for removal are to be retained and must be suitably protected during construction as per the recommendations of the Aboricultural Impact Assessment dated 28 January 2021 and Aboricultural Advice dated 26 April 2023 prepared by CPS; and	As above	As above	
	d)	if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	Interview - A Galvin		
Air Quality					
C20.		The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Environmental and Waste Management Plan Site inspection Interview - A Galvin	No dust generation was observed during the site inspection. Active earthworks at the time of the fourth audit site inspection for stormwater trenches. Entrance is sealed, however, can generate dust when vehicles access or egress. This area in wetted down frequently by the traffic control team. Hoses for dust suppression are located along the southern boundary where trenching works are cooccurring.	Compliant
C21.		During construction, the Applicant must ensure that:			

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	a)	activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;	Interview - A. Galvin Site inspection	The site at the time of the fourth audit site inspection some news areas are exposed from tranching works. Most constrcution traffic remain on asphalt areas of the site. These areas a wetted down when required.	Compliant
	b)	all trucks entering or leaving the site with loads have their loads covered;	Environmental and Waste Management Plan Interview - A. Galvin Site Inspection	Addressed in plan. No observation made of trucks leaving site during the fourth audit. The auditor was advised that covering loads is the practice on site.	
	c)	trucks associated with the development do not track dirt onto the public road network;	Environmental and Waste Management Plan Interview - A. Galvin Site Inspection	No observed mud tracked onto the road at the time of the audit. Auditor informed by Site Manager that either Council or a contractor sweep the road when required. Wheel wash station on site with a gurney to clean wheels before leaving site. Street sweeper called if required.	
	d)	public roads used by these trucks are kept clean; and	As above	No observed mud tracked on to road at the time of the fourth audit. ADCO team clean out the gutters specifcally and frequently.	
	e)	land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Site inspection	Trenching works being undertaken at the time of the fourth audit with exposed surfaces. Land will be stabiled directly following completion of the works. Geotextile covering observed on exposed surfaces where construction materials were being stored.	
Imported Fill					
C22.		The Applicant must:			
	a)	ensure that only VENM, ENM, or other material considered suitable for beneficial reuse via a general or specific resource recovery exemption issued by NSW EPA is brought onto the site;	Sighted Mawsons letter dated 5 September 2022 regarding confirming road base as 100% VENM from Milbrae Western Riverina Quarry. Sighted products statements from Mawsons for 20 mm road base and screened sand material.	Importation of fill material was at the time of the site inspection limited to road base material underlying the site office and amenities buildings, and screened sand. No material was brought to site during the fourth audit period.	Not triggered
	b)	keep accurate records of the volume and type of fill to be used; and	Interview - A Galvin		
	c)	make these records available to the Certifier upon request.	Interview - A Galvin		
Disposal of Seepage and Stormwater					
C23.		Adequate provisions must be made to collect and discharge stormwater drainage during construction to the Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council’s stormwater drainage system or street gutter.	Crown Certificate 1 Interview - A. Galvin	No requirement to discharge any stormwater offsite during the fourth audit period. Stormwater left to infiltrate the soil or evaporate.	Not triggered
Emergency Management					
C24.		The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	ADCO HSE Induction	HSE Induction adequately addresses Emergency Management	Compliant
Stormwater Management System					
C25.		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. The system must:	Crown Certificate 1 Civil Design Certification for CC1, Rev 01, 26 April 2022 Section 68 Approval No.: 10/2023(1), Carry out water supply, sewerage & stormwater works, dated 7 March 2023 Interview - J Innes	Stormwater drainage design details accepted by Certifier after commencement of construction. No evidence provided that the design was provided to Council. The project since received S68 approval from Council for the stormwater management system. It is noted that Council confirmed receipt of Section 68 Documents in June 2022 after commencement of construction. No further action required.	Compliant
	a)	be designed by a suitably qualified and experienced person(s);	As above	As above	
	b)	be generally in accordance with the conceptual design in the Civil SSDA Design Report revision 6 dated 30 March 2021, prepared by Bonacci;	As above	As above	
	c)	be designed in accordance with Council’s Engineering Guidelines – Subdivision and Development Standards, Council’s On-site Detention Policy (CS-CP-404) and Council’s Stormwater Drainage & Disposal Policy (CS-CP-310);	As above	As above	
	d)	account for a critical storm event and ensure a maximum discharge of 65 litres per second per hectare;	As above	As above	
	e)	incorporate an on-site detention system if required to maintain flows required by C25(d), which must be designed and certified by a qualif ied Civil Engineer with experience in Hydraulic Analysis. The Civil Engineer must sign off all drawings and calculations and provide details of Prof essional Indemnity Insurance;	As above	No on-site detention at the time of the audit inspection.	
	f)	be in accordance with applicable Australian Standards; and	As above	As above	
	g)	ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.	As above	As above	
C26.		Prior to commencement of construction, the Applicant must in consultation with Council, provide details and type of appropriate warning signs to be installed in accordance with Council’s On-site Detention Policy (CS-CP-404) for areas subject to water ponding to the Certifier.	As above	No on-site detention proposed at the time of the audit inspection.	Not triggered
Aboriginal Cultural Heritage					
C27.		Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report (Rev H) prepared by Comber consultants dated 28 January 2021.	AACHMP Interview - A Galvin	The AACHMP addressed the recommendation of the assessment report and is being implemented at the site.	Compliant
Unexpected Finds Protocol - Aboriginal Heritage					
C28.		In the event that surface disturbance identifies a new Aboriginal object:			
	a)	all works must halt in the immediate area to prevent any further impacts to the object(s);	ADCO HSE Induction	Included unexpected finds management.	

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;			Not triggered
	c)	the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;			
	d)	the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and			
	e)	works must only recommence with the written approval of Planning Secretary.			
Unexpected Finds Protocol - Historic Heritage					
C29.		If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the OEH Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage Division of the OEH.	ADCO HSE Induction	Included unexpected finds management.	Not triggered
	a)	all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;			
	b)	depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and			
	c)	works may only recommence with the written approval of the Planning Secretary.			
Waste Storage and Processing					
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.	Environmental and Waste Management Plan EMP (V4) Site Inspection	Addressed in management plans. The auditor observed the site to be generally tidy with no unsecured waste.	Compliant
C31.		All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	As above Greenstar Riverina Skips Waste Management Reports, July to November 2023	General reference to meeting EPA requirements in EMP (V4) Section 11.3.16 of the EMP (V4) addressed waste classification in accordance with the Guideline.	Compliant
C32.		The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	Interview - A. Galvin Site inspection	The audit found an adequate level of knowledge of site personnel with regard to the concrete waste and rinse water.	Compliant
C33.		The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	Greenstar Riverina Skips Waste Management Reports, July to November 2023	MOITS Site Instruction with scope of works, images and disposal receipts for Asbestos soil removal. Site Instructions dated 27 July 2023 (Asbestos soil removal (hot spot)), 3 August 2023 (asbestos soil removal Building 15). Asbestos contaminated soil was contained in a large skip bin lined with black plastic. Disposal was at the Tharbogang Landfill, licenced to receive asbestos contaminated soil. Evidence has not been provided regarding control of emission to air.	Compliant
C34.		The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	MOITS Site instruction, 27 July 2023 and 3 August 2023 EI Australia E25649.E11 Asbestos Clearance Inspection Report, dated 17 August 2023. Interview - A Galvin	MOITS Site Instruction with scope of works, images and disposal receipts for Asbestos soil removal. Site Instructions dated 27 July 2023 (Asbestos soil removal (hot spot)), 3 August 2023 (asbestos soil removal Building 15). Asbestos contaminated soil was contained in a large skip bin lined with black plastic. Disposal was at the Tharbogang Landfill, licenced to receive asbestos contaminated soil. Photographic evidence of the control of emissions to air was provided in the EI Australia E25649.E11 Asbestos Clearance Inspection Report, dated 17/08/2023, showing the area being wetted down with hoses.	Compliant
Outdoor Lighting					
C35.		The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Interview - A. Galvin Site Inspection EMP (V4)	No outdoor lighting at the time of audit. The electrical certificate for outdoor lighting has been submitted under CC5.	Not triggered
Site Contamination					
C36.		Remediation of the site must be carried out in accordance with the Remediation Action Plan prepared by JK Environments and dated 25 April 2020 and any variations to the Remediation Action Plan prepared by JK Environments approved by an NSW EPA-accredited Site Auditor.	Remediation Action Plan, 25 April 2020 EI Australia Additional Investigation and Remedial Works Plan, 4 May 2022 BCA CROWN CERTIFICATE - 1, CRO-22066, 28 June 2022 Friable Asbestos Removal Licence, AD202013 valid to 23 September 2023 EI Australia E25649.E11 Asbestos Clearance Inspection Report, dated 17 August 2023. Interview - A Galvin Email from Project Hygienist, dated 29/01/2024.	A hot spot of asbestos contaminated soil was removed and an Asbestos Clearance Inspection report prepared by EI Australia (August 2023). However, remediation works were not carried out in accordance with the Remediation Action Plan, 25 April 2020. Project Hygienist was contacted following the site audit regarding the air quality sampling during remediation works. The air filters were sitting at the post office and were resent for testing in the week commencing 29/01/2024. Site personnel and contractors were advised verbally of the asbestos remediation works occurring on site and associated exclusion zones.	Compliant

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
C37.		Where remediation is carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	Aconex email from ADCO to Site Auditor Tom Onus Ramboll Australia, 11 July 2023.	Accredited Site Auditors detail provided to Certifier and Letter of Intent to engage services. The Site Auditor is from Ramboll Australia Pty Ltd. The Site Auditor was informed on the 11 July 2023 that ACM was discovered under the recently demolished Building 15. The correspondence identifies that the asbestos would be removed under the guidance of the Project hygienist. However, the Site Auditor was engaged to confirm satisfactory completion of the remediation of hot spot and Building 15 on 4 February 2024. The Site Auditor confirmed satisfactory approval on 5 February 2024.	Compliant
C38.		The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	As above Interview - A Galvin	No such change in risk reported.	Not triggered
Independent Environmental Audit					
C39.		Propose independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.	Appointment of Experts - Griffith Base Hospital Redevelopment (SSD 9838218), Independent Auditors, 27/10/2023	DPE was provided CVs and Declarations of Independence of the audit team on 26/10/2023. Ms Nicola Smith, Mr Will Weir and Ms Natscha Arens of NGH Pty Ltd endorsed as audit team on 27 October 2023.	Compliant
C40.		Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.			Compliant
C41.		The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least four week's notice to the Applicant of the date or timing upon which the audit must be commenced.			Not triggered
C42.		In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:			Compliant
	a)	review and respond to each Independent Audit Report prepared under condition C40 of this consent, or condition C41 where notice is given;	Sighted Applicant's Response report to the third audit.	The Independent Audit - Proponent review and response for the third audit is dated 16 August 2023.	
	b)	submit the response to the Planning Secretary; and	Sighted portal notification, cover letter between HI and the Planning Secretary	Portal notification, cover letter between HI and the Planning Secretary regarding the Applicant's Response for Audit 3, dated 18 August 2023. Sighted post approval receipt, in 'Document Properties', shows it was created on 18 August 2023.	
	c)	make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.	Interview - S. Cincotta, an email from MLHD and another from HI to confirm that the IEA 3 Report and Proponent's Response were published on the Project website, dated 24/08/23 and 25/01/23 respectively.	The IEA 3 report and Applicant's Response were added to the website as they were received by HI as identified during the interview. It went to the Planning Secretary on 18 August 2023 and were published on the website by the 25 August 2023, within 60 days following submission to the Secretary.	
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.	Sighted post approval receipt of IEA 3 and cover letter of Proponent's Response and IEA 3 submitted to Planning Secretary, dated 18 August 2023 Sighted email from DPE noting confirmation of receipt, dated 18/08/2023	The site audit for Audit 3 was undertaken on 6 July 2023. The Audit 3 report is dated 11 August 2023. The Propoent's Response is dated 16 August 2023. The Audit 3 report and response was submitted to the Planning Secretary on 18 August 2023. A commitment was made in both Cover Letter and Post Approval form that these documents would be uploaded to the website within 60 days. Sighted email from DPE noting confirmation of receipt, dated 18/08/2023.	Compliant
C44.		Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.			Not triggered
Part D - Prior to Commencement of Operation					
Notification of Occupation					
D1.		At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.			Not triggered
External Walls and Cladding					
D2.		Prior to the occupation of the building, the Applicant must provide the Certifying Authority with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.			Not triggered
D3.		The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.			Not triggered
Works as Executed Plans					
D4.		Prior to the commencement of operation, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.			Not triggered
Warm Water Systems and Cooling Systems					
D5.		The installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.			Not triggered
Outdoor Lighting					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D6.		Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and:			<i>Not triggered</i>
	a)	complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and			<i>Not triggered</i>
	b)	has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.			<i>Not triggered</i>
<u>Mechanical Ventilation</u>					
D7.		Prior to commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with:			<i>Not triggered</i>
	a)	AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and			<i>Not triggered</i>
	b)	has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.			<i>Not triggered</i>
<u>Operational Noise – Design of Mechanical Plant and Equipment</u>					
D8.		Prior to the commencement of operation, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the assessment undertaken under condition B24 have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project noise trigger levels as recommended in the Noise and Vibration Impact Assessment dated 28 July 2021 and prepared EMM.			<i>Not triggered</i>
<u>Fire Safety Certification</u>					
D9.		Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety			<i>Not triggered</i>
<u>Structural Inspection Certificate</u>					
D10.		Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after:			<i>Not triggered</i>
	a)	the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and			<i>Not triggered</i>
	b)	the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.			<i>Not triggered</i>
<u>Compliance with Food Code</u>					
D11.		Prior to the commencement of operation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that any new kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.			<i>Not triggered</i>
<u>Post-construction Dilapidation Report – Protection of Public Infrastructure</u>					
D12.		Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:			<i>Not triggered</i>
	a)	ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent;			<i>Not triggered</i>
	b)	have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads).			<i>Not triggered</i>
	c)	be submitted to the Certifier;			<i>Not triggered</i>
	d)	be forwarded to Council for information; and			<i>Not triggered</i>
	e)	be provided to the Planning Secretary when requested.			<i>Not triggered</i>
<u>Repair of Public Infrastructure</u>					
D13.		Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:			
	a)	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or			<i>Not triggered</i>
	b)	relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or			<i>Not triggered</i>
	c)	pay compensation for the damage as agreed with the owner of the public infrastructure.			<i>Not triggered</i>
		<i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.</i>			<i>Not triggered</i>
<u>Car Parking</u>					
D14.		Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant.			<i>Not triggered</i>
<u>Post-Construction Survey – Adjoining Properties</u>					
D14.		Where a pre-construction survey has been undertaken in accordance with condition B7, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:			<i>Not triggered</i>
	a)	document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B7;			<i>Not triggered</i>
	b)	be provided to the owner of the relevant buildings surveyed;			<i>Not triggered</i>
	c)	be provided to the Certifier; and			<i>Not triggered</i>
	d)	be provided to the Planning Secretary when requested.			<i>Not triggered</i>

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D16.		Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.			Not triggered
Car Parking Arrangements					
D17.		Prior to the commencement of final operation, or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that car parking on the subject site is fully operational and a minimum of 357 spaces are available for use across the entire campus and provided in accordance with the latest versions of AS 2890.1 and AS 2890.6.			Not triggered
Bicycle Parking and End-of-Trip Facilities					
D18.		Prior to occupation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier:			Not triggered
	a)	the provision of a minimum 30 bicycle parking spaces;			Not triggered
	b)	the layout, design and security of bicycle facilities must comply with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance;			Not triggered
	c)	the provision of end-of-trip facilities for staff; and			Not triggered
	d)	(a) appropriate pedestrian and cyclist advisory signs are to be provided.			Not triggered
		Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.			Not triggered
Green Travel Plan					
D19.		Prior to the commencement of operation, the Applicant must complete the upgrade of the Magill Street and Botany Street intersection as required by condition B47 to the satisfaction of Council, and evidence is to be submitted to the Certifying Authority.			Not triggered
	a)	be prepared by a suitably qualified traffic consultant in consultation with Griffith City Council and Transport for NSW (Sydney Coordination Office);			Not triggered
	b)	include objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;			Not triggered
	c)	include specific tools and actions to help achieve the objectives and mode share targets;			Not triggered
	d)	include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP;			Not triggered
	e)	include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.			Not triggered
	f)	conduct a site audit for accessibility and amenity for pedestrians and cyclists, including shade cover, lighting, shelter, priority at internal roads, and accessibility of ramps and paths;			Not triggered
	g)	consider how access / site permeability through the site can be improved by creating more direct footpaths, which may not necessarily run along internal roads;			Not triggered
	h)	audit the adjacent bus stops for shelter, seating, lighting and accessibility.			Not triggered
	i)	audit crossings, particularly those required to reach bus stops;			Not triggered
	j)	identify any necessary improvements to surrounding pedestrian infrastructure to support active transport to the site, including crossings;			Not triggered
	k)	investigate financial incentives to take public transport, this could include providing a subsidy to staff for public transport fares;			Not triggered
	l)	provide data to TfNSW about staff shift changeover times and the number of staff working respective shifts, to inform any potential changes to supporting transport services;			Not triggered
	m)	identify any improvements such as lighting that may be required to promote the safety of travel to and from the site, particularly at night;			Not triggered
	n)	consider providing a screen inside with real time public transport information, so people can avoid waiting too long at the bus stop, particularly in the heat, cold, rain or at night;			Not triggered
	o)	consider the potential for the bus route to go into the campus and stop near the main entrance (as swept analysis has been performed for fire trucks);			Not triggered
	p)	consider provision of panniers and/or trailers for loan for bikes so people can gain an understanding of what they can carry with a bicycle;			Not triggered
	q)	investigate flexibility around starting and finishing times and whether this will help staff manage other tasks while being able to use active or public transport;			Not triggered
	r)	expedite the actions listed in the GTP, and prioritise those that are needed before occupation, including developing a TAG and communication strategy;			Not triggered
	s)	provide timelines and identify responsible people for the full development and delivery of GTP;			Not triggered
	t)	identify and promote what community transport is available, how community transport access the site, who is eligible for community transport;			Not triggered
	u)	confirm fleet vehicle arrangements e.g. are they only used for business or are they taken home by employees; are there opportunities for carpooling, etc.;			Not triggered
	v)	consider implementing a parking management strategy that prioritises parking for patients and visitors and limits parking for staff that are working during the day, when alternatives are available; and			Not triggered
	w)	incorporate a program for annual review for at least the first five years and involve surveys, evaluation and review.			Not triggered
Heritage Interpretation Strategy					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D20.		Prior to the commencement of operation, the Applicant must implement the Interpretation Strategy and Plan required by condition B11. Prior to the commencement of operation, the Applicant must implement the Interpretation Strategy and Plan required by condition B11.			Not triggered
Utilities and Services					
D21.		Prior to commencement of operation, a compliance certificate under the section 307 of the Water Management Act 2000 must be obtained from Council and submitted to the Certifier.			Not triggered
Stormwater Management System					
D22.		Prior to commencement of operation, stormwater infrastructure (including signs) and any on-site detention system approved by Council is to be installed in accordance with the approved plans, Council's Engineering Guidelines – Subdivisions and Development Standards and Council's Stormwater Drainage & Disposal Policy (CS-CP-310).			Not triggered
Stormwater Operation and Maintenance Plan					
D23.		Prior to the commencement of operation, a Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following:			Not triggered
	a)	maintenance schedule of all stormwater quality treatment devices;			Not triggered
	b)	record and reporting details;			Not triggered
	c)	relevant contact information; and			Not triggered
	d)	Work Health and Safety requirements.			Not triggered
Signage					
D24.		Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.			Not triggered
D25.		Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.			Not triggered
Operational Waste Management Plan					
D26.		Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must:			Not triggered
	a)	detail the type and quantity of waste to be generated during operation of the development;			Not triggered
	b)	describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997</i> , <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009)</i> ;			Not triggered
	c)	detail the materials to be reused or recycled, either on or off site; and			Not triggered
	d)	include the Management and Mitigation Measures included in the EIS and Appendix B in the RtS.			Not triggered
Site Contamination					
D27.		Prior to commencement of operation, the Applicant must submit a Validation Report for the development to the Certifier. The Validation Report must:			Not triggered
	a)	(a) Be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Assessment and Management (CPSS CSAM) scheme;			Not triggered
	b)	be prepared in accordance with the relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997;			Not triggered
	c)	(a) include, but not be limited to:			Not triggered
	(i)	where possible any detention tanks should have an open base to infiltrate stormwater into the ground. Infiltration should not be used if ground water and/or any rock stratum is within 2.0 metres of the base of the tank;			Not triggered
	(ii)	should a pump system be required to drain any portion of the site the system must be designed with a minimum of two pumps being installed, connected in parallel (with each pump capable of discharging at the permissible discharge rate) and connected to a control board so that each pump will operate alternatively. The pump wet well shall be sized for the 1% AEP (1 in 100 year), 2 hour storm assuming both pumps are not working;			Not triggered
	(iii)	the pump system must also be designed and installed strictly in accordance with Randwick City Council's Private Stormwater Code;			Not triggered
	(iv)	should a charged system be required to drain any portion of the site, the charged system must be designed such that:			Not triggered
	(v) i)	there are suitable clear-outs/inspection points at pipe bends and junctions; and			Not triggered
	(vi) ii)	the maximum depth of the charged line does not exceed 1m below the gutter outlet;			Not triggered
	d)	be submitted to the Planning Secretary for information.			Not triggered
D28.		Prior to commencement of operation, the Applicant must obtain confirmation from the Certifier in writing that the requirements of condition D27 have been met.			Not triggered
D29.		Prior to the commencement of operation, the Applicant must submit a Section A1 Site Audit Statement or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan prepared by a NSW EPA accredited Site Auditor. The Section A1 or A2 Site Audit Statement must verify the relevant part of the site is suitable for the intended land use and be provided, along with any Environmental Management Plan to the Planning Secretary and the Certifier.			Not triggered
Landscaping					
D30.		Prior to the commencement of final operation, or other timeframe agreed by the Planning Secretary, landscaping of the site must be completed in accordance with landscape plans required by condition B31.			Not triggered
D31.		Prior to the commencement of final operation, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping on-site and submit it to the Certifier. The plan must:			Not triggered
	a)	describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping; and			Not triggered

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	(a) be consistent with the Applicant’s Management and Mitigation Measures in the RtS.			<i>Not triggered</i>
Loading Dock Management Plan					
D32.		Prior to the commencement of final operation, the Applicant must submit a Loading Dock Management Plan (LDMP) to the Certifier and the Planning Secretary to manage vehicles entering and exiting the loading bays whilst a waste vehicle is parked in front of the waste			<i>Not triggered</i>
Operational Management Plan					
D33.		Prior to the commencement of final operation, the Applicant must submit an Operational Management Plan to the Certifier and the Planning Secretary which aims to minimise potential traffic impacts associated with the oxygen tank delivery and substation maintenance.			<i>Not triggered</i>
Traffic Management Measures - Warrambool Street					
D34.		Prior to the commencement of final operation, the Applicant must ensure that the following			
	a)	installation of signs on both sides of Warrambool Street to raise awareness and warn the public to be cautious as emergency vehicles are in operation in the area to be agreed with by NSW Ambulance and Council; and			<i>Not triggered</i>
	b)	painted chevron and wording (no stopping, keep clear) on the western half of Warrambool Street in front of the emergency vehicle entry to the new hospital.			<i>Not triggered</i>
Emergency Vehicle Access - Warrambool Street					
D35.		Prior to the commencement of operation, the Applicant must undertake consultation with St Patrick’s Primary School regarding an education safety campaign for students, staff and parents to raise awareness before the emergency vehicle entry is commissioned for use by NSW Ambulance. Details of the consultation and outcomes and agreed actions are to be submitted to the Certifier and the Planning Secretary for information.			<i>Not triggered</i>
Part E - Post Construction					
Operation of Plant and Equipment					
E1.		All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.			<i>Not triggered</i>
Warm Water Systems and Cooling Systems					
E2.		The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires’ Disease			<i>Not triggered</i>
Heritage Interpretation Plan					
E3.		The Applicant must implement the most recent version of the Heritage Interpretation Plan under condition B27.			<i>Not triggered</i>
Heritage Interpretation Strategy					
E4.		The Applicant must implement the most recent version of the Heritage Interpretation Strategy and plan under condition B11.			<i>Not triggered</i>
Environmental Management Plan					
E5.		Upon completion of remediation works, the Applicant must manage the site in accordance with the Environmental Management Plan approved by the Site Auditor (if any) under condition D29 and any on-going maintenance of remediation notice issued by EPA under the Contaminated Land Management Act 1997.			<i>Not triggered</i>
Operational Noise Limits					
E6.		The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits as recommended in the Noise and Vibration Impact Assessment dated 28 July 2021 and prepared EMM.			<i>Not triggered</i>
E7.		The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Noise and Vibration Impact Assessment dated 28 July 2021 and prepared by EMM. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.			<i>Not triggered</i>
Unobstructed Driveways and Parking Areas					
E8.		All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.			<i>Not triggered</i>
Green Travel Plan					
E9.		The Green Travel Plan required by condition D19 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.			<i>Not triggered</i>
Ecologically Sustainable Development					
E10.		Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation the Certifier and Planning Secretary are to be provided with a report from the Applicant by a suitably qualified and experienced expert demonstrating that the project attains the minimum number of ESD points as required by condition B9 of this consent.			<i>Not triggered</i>
Outdoor Lighting					
E11.		Notwithstanding condition D6, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.			<i>Not triggered</i>
Landscaping					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
E12.		The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D31 for the duration of occupation of the development.			<i>Not triggered</i>
Hazards and Risk					
E13.		The Applicant must store all chemicals, fuels and oils used on-site in accordance with:			<i>Not triggered</i>
	a)	(a) the requirements of all relevant Australian Standards; and			<i>Not triggered</i>
	b)	the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.			<i>Not triggered</i>
E14.		In the event of an inconsistency between the requirements of condition E13(a) and E13(b), the most stringent requirement must prevail to the extent of the inconsistency.			<i>Not triggered</i>
Dangerous Goods					
E15.		The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.			<i>Not triggered</i>
E16		Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.			<i>Not triggered</i>
Discharge Limits					
E17		The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters.			<i>Not triggered</i>
Stormwater Management System					
E18.		Stormwater infrastructure is to be maintained for the life of the project.			<i>Not triggered</i>
Road Safety Audit – Warrambool Street					
E19.		Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, an independent Road Safety Audit (RSA), prepared by a suitably qualified and experienced expert, must be undertaken of the local road network surrounding the hospital site and specifically centred on Warrambool Street, focusing on the interaction of hospital related traffic (including emergency vehicles) with vehicles and pedestrians associated with the adjacent St Patrick's Primary School.			<i>Not triggered</i>
E20.		Should the findings of the RSA required by condition E19 identify any roads safety issues that require rectification, the recommended road safety measures are to be implemented within three months of the RSA being completed. The RSA and evidence of implementation of the recommendations are to be provided to the Certifier, Council and the Planning Secretary for			<i>Not triggered</i>

Appendix D Site photos



Nurse station



Construction storage, geofabric covering the ground.



Stockpiles of construction material between site access road and development.



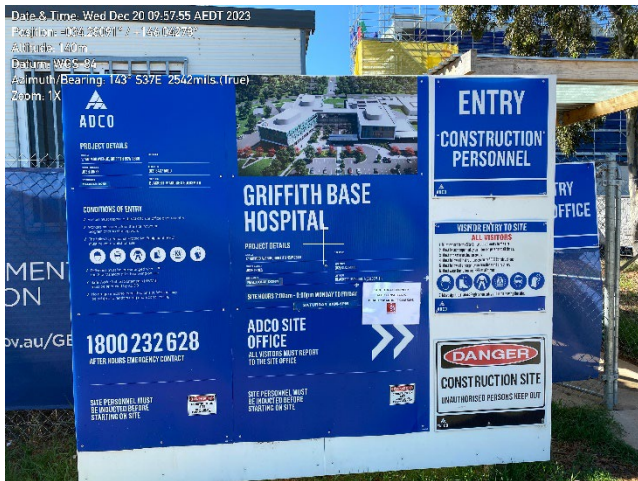
Storage area had been cleared for gravel stockpile and trenching works (refer to right of photo with orange flagging) adjacent to the southern boundary.



Sedimentation in the gutter down-gradient of the site access on Animoo Avenue.



Sediment-free footpath down-gradient of the project site, along the southern boundary.



Site signage erected at the construction personnel access point from Animoo Avenue. Details of the Site Manager have been updated on the sign.



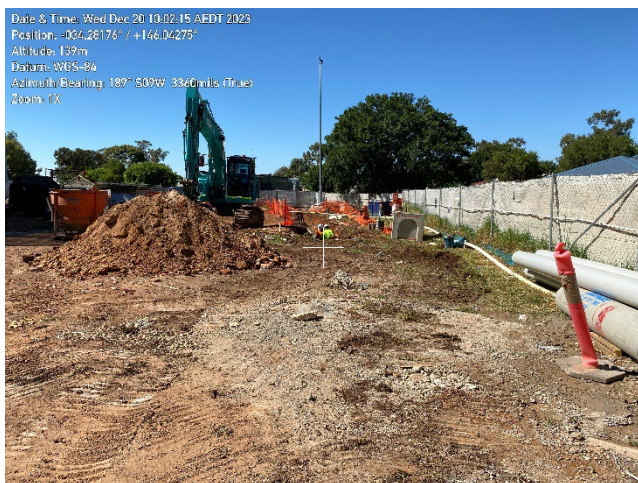
There have been no issues with graffiti or third-party material on the hoarding.



Waste skip bin. A generally tidy site.



Cardboard skip bin.



Trenching works.



Manatau Telehandler (0034) that was identified in the Hammertech records.



Manatau Telehandler (0034).



Sedimentation in gutter of Animoo Avenue, down-gradient from the site access.



Maintained sediment fencing along the southern boundary of the site.



Tree protection. No sediment visible on the path beyond the southern boundary.



Intact tree protection near personnel entrance.



Construction site access with geotextile under rumble grid. Sediment fencing along the southern boundary fence. Sand bags visible to keep the sediment fencing in contact with the ground.



Spill of spoil beyond the boundary fence.



Sediment fencing around the contractor parking area and spoil storage area.



No contractor parking observed for the Project in a contractor parking exclusion zone.



Orange waste skip bin and sediment fencing along the perimeter fence along the north-western boundary.



Flammable liquids cabinet adjacent to Nurse Call Station.



Maintained sediment fence and coir logs at site access, adjacent to southern boundary.



Spill response kit at the site access.



Absorbant material inside the spill response kit.



No Project related contractor parking in the contractor parking exclusion zone.



Drain protection with clean geofabric and sand bags.

Appendix E Audit consultation

E.1 NSW Department of Planning and Environment

From: [Georgia Dragicevic](#)
To: [Nicola Smith](#)
Cc: [Katrina O'Reilly](#)
Subject: RE: A220154.00 - Griffith Base Hospital IEA
Date: Friday, 1 December 2023 8:50:22 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Nicola,

Thank you for consulting the department on the IEA for Griffith Base Hospital. In addition to the consent requirements, please look into the management of noise, dust, operating hours, truck movements, erosion and sediment, including dirt tracking onto public roads, community consultation and complaints management.

Thank you kindly,
Georgia

From: Nicola Smith <nicola.s@nghconsulting.com.au>
Sent: Thursday, 30 November 2023 8:09 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Natascha Arens <natascha.a@nghconsulting.com.au>
Subject: A220154.00 - Griffith Base Hospital IEA

Hello,

I am the approved independent support auditor for the above project (SSD-9838218). We will be conducting the site audit in the next few weeks.

The scope of this audit will broadly include:

- Conditions of consent applicable to the construction phase of the project
- All post approval documents required by the conditions of consent (e.g. implementation of Environmental management plans and sub plans)
- All environmental licences and approvals applicable to the development
- An assessment of the environmental performance of the development
- A high-level review of the project's EMPs.

As required by the Independent Audit Post Approvals Requirements (2020), I am consulting with relevant stakeholders. Are there any other matters that the Department would like addressed as part of this fourth compliance audit?

Best regards,
Nicola

Nicola Smith
Technical Lead & Regional Manager

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E.2 Griffith City Council

From: [Nicola Smith](#)
To: admin@griffith.nsw.gov.au
Cc: [Natascha Arens](#)
Bcc: 7cf7c53c-24ee-4d50-aa92-5a5f4bf5673f.metaPublish@nghconsultingmx.deltapim.com
Subject: A220154.00 - Griffith Base Hospital IEA
Date: Thursday, 30 November 2023 8:27:57 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[7cf7c53c-24ee-4d50-aa92-5a5f4bf5673f.png](#)

Hello,

I am the Department of Planning and Environment's approved support Independent Auditor for SSD development 9838218. The audit team consists of Natascha Arens (approved Lead Independent Auditor) and I. We are currently in the process of undertaking the fourth audit of the Project and as part of this process, I am seeking input from relevant agencies.

The audit scope and associated report includes:

- A review of all relevant conditions and an assessment of compliance with each condition
- A summary of the findings undertaken during the assessment of all conditions
- Assessment of the environmental performance of the development, and its effects on the surrounding environment including the community
- A review the adequacy of any management plans and other documents required under the consent
- Recommendations to improve the environmental performance of the development, and improvements to any document required under this consent.

Is there any aspect of the project that Council would like us to focus on?

Best regards,
Nicola

Nicola Smith
Technical Lead & Regional Manager

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