

HEALTH INFRASTRUCTURE

Independent Audit 4 – Proponent review and response

SSD-9838218 Griffith Base Hospital

12 February 2024

Declaration

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

Declaration	
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Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
V0.1	9 February 2024	Stephanie Cincotta	Independent Audit – Proponent review and response	Kathryn Saunders	Arjuna Thiru Moorthy
V1.0	12 February 2024	Stephanie Cincotta	Independent Audit – Proponent review and response	Kathryn Saunders	Arjuna Thiru Moorthy

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1. Introduction

1.1 Project Application Number and Project Name

SSD-9838218 Griffith Base Hospital Redevelopment

1.2 Site Address

Griffith Base Hospital, 1 Noorebar Ave, Griffith NSW 2680

Lot 2 DP 1043580

1.3 Project Contact Details

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

1.4 Independent Auditor

NGH Pty Ltd

1.5 Independent Audit Date

20 December 2023

2. Proponent response

The Independent Audit Report 4 was prepared by Nicola Smith and Natascha Arens, from NGH. The Audit Report dated 5 February 2024 was received on 5 February 2024 for an audit site inspection completed on 20 December 2023. The Audit Report was submitted to DPE on 12 February 2024. The Audit Report has been reviewed and the response to the audit findings are listed in the below table.

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

Please note the below table contains a list of the 5 non-compliances as determined in Audit 4.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
A2	The development may only be carried out: a) in compliance with the conditions of this consent;		A number of non-compliant findings have been recorded with regard to works not in accordance with the Project CEMP and sub-plan and content and/or timing of submission of reporting deliverables.	Non-compliant	NC1	Addressed individually below.
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.	Non-compliant	NC31	Completed – rectified after identification. Action – Certifier notified of review following IEA 3 on 24 January 2024.
B18	The Construction Noise and Vibration Management Sub Plan must address, but not be limited to, the following: d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B18(d);		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 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	Non-compliant	NC17	Completed – CNVMP includes community consultation information and is published on the Griffith Base Hospital Redevelopment website. Action – Ensure more detailed community consultation on the CNVMP is undertaken prior to commencement of Stage 2.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
			<p>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. Action required prior to Stage 2.</p>			
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'.		<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. Refer to site inspection photographs.</p> <p>Remove sediment from gutter of Animoo Avenue.</p>	Non-compliant	NC27	<p>Completed – Rectified after identification.</p> <p>Action – Sedimentation controls to be checked and maintained.</p>
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).		<p>In accordance with the CEMP, 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.</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>	Non-compliant	NC32	<p>Completed – Rectified after identification.</p> <p>Action – Sedimentation controls to be checked and maintained.</p> <p>Action – Ensure community consultation on the CNVMP is undertaken prior to commencement of Stage 2</p>

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
			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.			
