

HEALTH INFRASTRUCTURE

Independent Audit 2 – Proponent review and response

SSD-9838218 Griffith Base Hospital

14 March 2023

Declaration

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

| Declaration | |
|------------------|---|
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| Date: | 14 March 2023 |

Document Management, Tracking and Revision History

| Version | Date | Author | Description | Reviewed by | Approved by |
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| Draft | 14 March 2023 | Christian Weitz | Independent Audit – Proponent review and response | 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

11 January 2023

2. Proponent response

The Independent Audit Report 2 was prepared by Will Weir, from NGH. The Audit Report dated 7 March 2023 but received on 10 March 2023 for an audit site inspection completed on 11 January 2023. The audit report has been reviewed and the response to the audit findings are listed in the below table.

Please note that whilst there seem to be a similar number of non-compliances as the first Audit many are reflective of the first Audit and have since that time been resolved (although they remain as non-compliances). This second audit is highlighting six (6) new non-compliances all of which all have been adequately actioned and addressed.

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

| Condition of Consent | Requirement (exact wording) | Evidence Collected | Independent Audit Findings and Recommendations | Compliance Status | Unique Identification on Noncompliance | Proponent Response & Timing |
|----------------------|--|--------------------|--|-------------------|--|--|
| A2 | <p>Terms of Consent The development may only be carried out: a) in compliance with the conditions of this consent;</p> | | <p>A number of non-compliant findings have been recorded with regard to the content and/or timing of submission of reporting deliverable. Not all required documents are provided on the project website.</p> <p><u>Recommendation</u> Address relevant non-compliant conditions.</p> | Non-compliant | NC1 | Addressed individually as below |
| A8 | <p>Evidence of Consultation Where conditions of this consent require consultation with an identified party, the Applicant must: (a)consult with the relevant party prior to submitting the subject document for information or approval; and (b)provide details of the consultation undertaken including: (i)the outcome of that consultation, matters resolved and unresolved; and (ii)details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p> | | Refer condition B5 (a) | Non-compliant | NC3 | <p>Refer condition B5 (a) – exposed at Audit No. 1 Documentation updated to ensure consultation has occurred and condition satisfied. Rectified through Audit No.1 but remains a non-compliance</p> |
| A9 | <p>Staging The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).</p> | | <p>Construction - demolition works were commenced 4 May 2022. The first Staging Report Rev No. V0 is dated 26 April and as such did not meet the requirement to submit one month prior to the commencement of construction.</p> <p>The current Staging Report, Rev No. V3 has been approved by the Planning Secretary.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC4 | <p>Non-compliance submitted (SSD-9838218-PA-16). Some demolition was covered under a Part 5 approval. Commencement of construction (demolition) under SSD-9838218 was on 4 May 2022. A review of project administration is underway to improve understanding, monitoring and compliance with Conditions of Consent. Monthly meetings being held with HI Planning and Project Team (PM and Contractor) to monitor compliance and ensure quality of documents. More specifically, monthly Audit (IEA) meetings will be held to</p> |

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| | | | | | | <p>ensure that conditions of consent are satisfied and complied with.</p> <p>HI Project Director to attend all IEA meetings to ensure project is complying with conditions and providing appropriate evidence.</p> <p>Non-compliance exposed at Audit No.1</p> <p>Actioned via the implementation of increased monitoring and management procedures.</p> <p>Addressed in response to Audit No.1 but remains a non-compliance</p> |
| A16 | <p>Staging, Combining and Updating Strategies, Plans</p> <p>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.</p> | | <p>During the second audit Numerous drums of Coating Agent - TREMproof 250GC R (Flammable Liquid 3) were observed stored near the on-site Flammable 3 cabinet without secondary containment within a bund in accordance with the Section 11.3.2 of the EMP (V3). Review of the Safety Data Sheet for this product also indicated it should be kept cool and not in direct sunlight, noting it was a clear and very hot day during the audit inspection. This was immediately corrected on-site once identified.</p> <p><u>Recommendation</u></p> <p>Ensure all hazardous chemicals are stored appropriately in accordance with the EMP.</p> | Non-compliant | NC23 | <p>Identified by Audit 2</p> <p>Completed – rectified onsite immediately after identification.</p> <p>All hazardous chemicals will be stored appropriately in accordance with the EMP for inspection at the next audit.</p> <p>Action - Workers will be updated of the procedure in accordance with the EMP.</p> |
| A23 | <p>Access to Information</p> <p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> | | <p>The Environmental Management Plan and associated sub-plans were not posted on the website at the time of the audit.</p> <p>No reporting of environmental performance found on website at the time of the audit.</p> <p>No comprehensive summary of monitoring results on the website at the time of the audit.</p> <p><u>Recommendation</u></p> | Non-compliant | NC6 | <p>Completed - rectified</p> <p>These documents are on the Griffith Base Hospital Redevelopment website.</p> |

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| | <p>i) the documents referred to in condition A2 of this consent;</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> | | <p>Ensure or requisite reports and information are provided on the Project's website.</p> | | | |
| A24 | <p>Compliance</p> <p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p> | | <p>The site induction material reviewed does not specifically single out the conditions of consent and does not provide detail on higher risk environmental management requirements.</p> <p>The site induction has been updated to include information regarding key environmental risks and requirement to comply with the conditions of approval.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC7 | <p>Completed - rectified in response to Audit No.1</p> <p>Site induction procedures have been updated. This information is available if required.</p> |
| A27 | <p>Non-Compliance Notification</p> <p>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.</p> | | <p>Numerous non-compliant findings from first audit not yet notified at the time of the audit.</p> <p><u>Recommendation</u> Report known non-compliance as per the requirements of A27.</p> | Non-compliant | NC24 | <p>Non compliance submitted (SSD-9838218-PA-18)</p> <p>Independent audit 1 was received on 24 Dec 2023 and independent audit 2 was undertaken 2 days after return to work on site on 11 Jan 2023.</p> <p>Audit No.1 suggested no action be taken however remains a non-compliance.</p> <p>Condition was not be satisfied by the time Audit 2 was issued due to holiday period and site shut-down. Audit formally issued 10</p> |

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| | | | | | | March 2023 so will now comply with this condition. |
| A28 | <p>Non-Compliance Notification</p> <p>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.</p> | | As above | Non-compliant | NC25 | <p>Non compliance submitted (SSD-9838218-PA-18)</p> <p>Independent audit 1 was received on 24 Dec 2023 and independent audit 2 was undertaken 2 days after return to work on site on 11 Jan 2023.</p> |
| B1 | <p>Notification of Commencement</p> <p>The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.</p> | | <p>No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of construction.</p> <p>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.</p> <p><u>Recommendation</u></p> <p>Confirm the correct construction commencement date and notify the Planning Secretary.</p> | Non-compliant | NC8 | <p>Non-compliance submitted (SSD-9838218-PA-16)</p> <p>Notification of commencement sent prior to commencement of <i>construction</i> on 23 June 2022 but after commencement of <i>demolition</i> on 4 May 2022.</p> <p>Non-compliance exposed at Audit No.1 – Will be actioned by a revised notice to be sent to DPE.</p> <p>Remains a non-compliance at Audit 2 but has been rectified and actioned in response to Audit 1.</p> |
| B2 | <p>Notification of Commencement</p> <p>If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.</p> | | <p>No audit evidence provided for notification of the commencement of Stage 1 during the first audit.</p> <p>during the first audit.</p> <p><u>Recommendation</u></p> <p>Ensure correct notification is undertaken for future stages of the development.</p> | Non-compliant | NC9 | <p>Affected by Audit No.1 addressed but rectified and no further action required but remains a non-compliance.</p> <p>On 20 June 2022 HI notified DPE formally that commencement of works will begin 23 June 2023.</p> |

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| | | | | | | DPE acknowledgement of this notification was provided to HI on 21 June 2023. |
| B5 | <p>Dilapidation Report</p> <p>a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure</p> | | <p>No audit evidence provided for review.</p> <p>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.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC10 | <p>Compliant</p> <p>Letters to neighbours (including St Vincent's Private Community Hospital) put in their letter boxes on 11 April 2022.</p> <p>Council consulted prior to 28 April 2022.</p> <p>Highlighted at Audit 1 and remains a non-compliance at Audit 2</p> |
| B11 | <p>Heritage – Interpretation Strategy</p> <p>Prior to the commencement of construction, an Interpretation Strategy and Plan must be developed to ensure that all historic information about the establishment and use of the hospital is maintained and presented to the public. Original joinery c 1931- 36 (multi-paned windows, French doors, architrave and trims) must be salvaged and reused in other historic Council buildings or sold for reuse in local restoration projects. There are a number of moveable heritage items which must be retained and used in an interpretive display or reinstated in an appropriate place within the new hospital. These items are:</p> | | <p>The Interpretation Plan addresses Condition B11, but was not prepared and submitted prior to the commencement of construction.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC13 | <p>Compliant</p> <p>Interpretation Plan submitted to Certifier on 26 April 2022 (ADCO Con-GCOR-000372) prior to the commencement of demolition on 4 May 2022.</p> <p>Rectified after Audit 1 but remains a non-compliance for Audit 2 although actioned.</p> |
| B14 | <p>Demolition</p> <p>Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.</p> | | <p>As the documents are not date stamped it is not clear if these were prepared and submitted to the Certifier and Planning Secretary prior to commencement of construction. The Cover Letter recorded in the DPIE Submission Receipt was not provided for review.</p> <p>Crown Certificate 2 confirms that the documents were submitted 13 July 2022 after the commencement of construction.</p> <p><u>Recommendation</u></p> | Non-compliant | NC14 | <p>Compliant</p> <p>Documents submitted to Certifier on 2 May 2022 (ADCO Con-GCOR-000443) prior to the commencement of demolition on 4 May 2022.</p> <p>Documents submitted to DPE as Appendix in Staging Plan submission (SSD-9838218-PA-3)</p> |

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| | | | No further action required. | | | |
| B16 | <p>Construction Environmental Management Plan Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following: a) Details of: ii) 24-hour contact details of site manager; vi) groundwater management plan including measures to prevent groundwater contamination; vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p> | | <p>Principal Contractor Details include company head office number only. The 24 hour 1800 contact number is provided on the site signage. Section 11.3.6 of the updated EMP (V3) addresses groundwater management. Section 11.3.12 of the updated EMP (V3) addressed external lighting compliance. Section 11.3.16 of the updated EMP (V3) now addresses unexpected contamination finds. Section 11.3.17 of the updated EMP (V3) addresses unexpected heritage finds.</p> | Non-compliant | NC15 | <p>Completed CEMP includes this information and published on the Griffith Base Hospital Redevelopment website</p> |
| B17 | <p>Construction Environmental Management Plan The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: b) be prepared in consultation with Council and TfNSW;</p> | | <p>CTMP Rev 6 outlines the consultation process with Council and TfNSW. <u>Recommendation</u> No further action required</p> | Non-compliant | NC16 | <p>Completed CEMP includes this information and published on the Griffith Base Hospital Redevelopment website.</p> |
| B18 | <p>Construction Environmental Management Plan The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B18(d);</p> | | <p>The CNVMP and specifically Section 7.3 provides strategies for community consultation and complaint management. It does not include strategies that have been developed with the community for managing high noise generating works. The CNVMP does not describe any consultation undertaken with the community. <u>Recommendation</u> Ensure community consultation is undertaken and update the CNVMP with the requisite information.</p> | Non-compliant | NC17 | <p>Completed CNVMP includes this information & published on the Griffith Base Hospital Redevelopment website.</p> |

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| B27 | <p>Interpretation Strategy – Aboriginal Heritage 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.</p> | | <p>The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post Approval receipt it referred to by DPE as a Heritage Interpretation Plan.</p> <p>The Heritage Interpretation Strategy report states that “Interpretation is a 3-stage process, beginning with the strategy”, then recommending a Heritage Interpretation Plan be prepared. This latter proposed document was not provided for audit review.</p> <p>The Griffith Base Hospital - Interpretation Plan applies only to built heritage as applicable to condition B11.</p> <p>It is not clear if an Aboriginal Heritage Interpretation Plan has been prepared and approved for the development. This was not sighted by the auditor.</p> <p><u>Recommendation</u> Clarify if a Heritage Interpretation Plan is required for Aboriginal Heritage. If so, prepare plan.</p> | Non-compliant | NC18 | <p>Completed Heritage Interpretation Plan requirement will be reviewed and provided to the Independent Auditor at the next audit.</p> |
| B28 | <p>Biodiversity Prior to the commencement of construction, the number and classes of ecosystem credits and species credits (like-for-like) set out in the tables below must be retired.</p> | | <p>Payment received after commencement of construction.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC19 | <p>Completed Payment received on 16 May 2022.</p> |
| C1 | <p>Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements: c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s);</p> | | <p>At the time of the second audit the signage had been updated to include the operational hours.</p> <p><u>Recommendation</u> No further action required</p> | Non-compliant | NC21 | <p>Compliant Hours of work included on site signage before independent audit 2.</p> |

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| C9 | <p>Implementation of Management Plans</p> <p>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> | | <p>During the second audit Numerous drums of Coating Agent - TREMproof 250GC R (Flammable Liquid 3) were observed stored near the on-site Flammable 3 cabinet without secondary containment within a bund in accordance with the Section 11.3.2 of the EMP (V3). Review of the Safety Data Sheet for this product also indicated it should be kept cool and not in direct sunlight, noting it was a clear and very hot day during the audit inspection. This was immediately corrected on-site once identified.</p> <p><u>Recommendation</u></p> <p>Ensure all hazardous chemicals are stored appropriately in accordance with the EMP.</p> | Non-compliant | NC26 | <p>Completed</p> <p>All hazardous chemicals will be stored appropriately in accordance with the EMP for inspection at the next audit.</p> |
| C25 | <p>Stormwater Management System</p> <p>Prior to commencement of construction, the Applicant must design and create a stormwater management system for the development and submit it to the satisfaction of Council and the Certifier.</p> | | <p>Stormwater drainage design details accepted by Certifier after commencement of construction. No evidence provided that the design was provided to Council.</p> <p>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.</p> <p><u>Recommendation</u></p> <p>No further action required.</p> | Non-compliant | NC22 | <p>Compliant</p> <p>Stormwater system accepted by Certifier (ADCO Con-GCOR-00033) prior to commencement of demolition on 4 May 2022.</p> <p>Stormwater Section 68 certificate accepted by Council prior to commencement of demolition on 4 May 2022. (refer attachment NC22).</p> |