

Prepared for ADCO Construction

## **Independent Environmental Audit 3**

### **Griffith Base Hospital**

SSD-9838218, NSW

September 2023

Project Number: 22-154

## Document verification

Project Title: Griffith Base Hospital

Project Number: 22-154

Project File Name: 22-154 Griffith Base Hospital Independent Environmental Audit 2 Final V1.0

Revision	Date	Prepared by	Reviewed by	Approved by
Draft V1.0	4/08/2023	Nicola Smith	Natascha Arens	Natascha Arens
Final V1.0	11/08/2023	Nicola Smith	Natascha Arens	Natascha Arens
Final V2.0	11/09/2023	Nicola Smith	Natascha Arens	Natascha Arens

NGH Pty Ltd prints all documents on environmentally sustainable paper including paper made from bagasse (a by-product of sugar production) or recycled paper.

## Table of Contents

<b>Executive summary .....</b>	<b>iii</b>
<b>1. Introduction.....</b>	<b>1</b>
1.1. Background .....	1
1.2. Audit team.....	1
1.3. Objectives .....	1
1.3.1. Audit scope and period .....	1
<b>2. Audit methodology .....</b>	<b>3</b>
2.1. Selection of the audit team.....	3
2.2. Independent audit scope development .....	3
2.3. Compliance evaluation .....	3
2.4. Site interviews .....	3
2.5. Site inspections .....	4
2.6. Consultation.....	4
2.7. Compliance status descriptors.....	4
<b>3. Audit findings.....</b>	<b>6</b>
3.1. Approval and documents list.....	6
3.2. Compliance performance .....	8
3.3. Summary of agency notices, orders, penalty notices or prosecutions .....	9
3.4. Non compliances .....	10
3.5. Previous audit (Audit two, January 2023) recommendations .....	15
3.6. Environmental plans, sub plans and post approval documents .....	23
3.7. Environmental performance .....	23
3.8. Consultation outcomes .....	23
3.9. Complaints .....	24
3.10. Incidents .....	24
3.11. Actual versus predicted impacts.....	24
3.12. Site inspection .....	26
3.13. Site interviews .....	26
3.14. Previous annual review or compliance report recommendations.....	26
3.15. Improvement opportunities.....	27
3.16. Key strengths.....	27
<b>4. Recommendations .....</b>	<b>28</b>
4.1. Summary of compliance and non-compliances against conditions.....	28

**5. Conclusion ..... 32**

**Appendix A Auditor CV .....A-I**

**Appendix B Audit table.....B-I**

**Appendix C Site photos..... C-I**

**Appendix D Audit consultation ..... D-I**

**Appendix E Statement of Independence ..... E-I**

**Table**

Table 2-1 Compliance status descriptors .....4

Table 3-1 Compliance performance.....8

Table 3-2 Non-compliances.....10

Table 3-3 Previous audit recommendations.....15

Table 4-1 Summary of non-compliances.....28

Table 5-1 Compliance performance.....32



## Executive summary

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.

NGH Pty Ltd was engaged to undertake this third construction independent audit of the project. The first construction independent audit of the project was 1 July 2022 and the second, 11 January 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 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 eleven (11) Conditions, compliant with 71 Conditions and 79 conditions were not triggered out of a total of 169 conditions of approval.

# 1. Introduction

## 1.1. Background

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. 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.

## 1.2. Audit team

The audit team includes Will Weir (Environmental Engineer), Natascha Arens (Exemplar Global Certified Principal Environmental Auditor), with audit support provided by Nicola Smith (Environmental Scientist).

Will, Natascha and Nicola were approved as the Independent Environmental Auditors by the Department of Planning and Environment.

This audit was undertaken by Natascha Arens and Nicola Smith.

Natascha and Nicola's Curricula Vitae (CVs) are provided as Appendix A.

## 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).

### 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.

## **Independent Environmental Audit 3**

*Griffith Base Hospital*



The audit period for this audit was from the date of audit two (11 January 2023) to the date of site visit, 6 July 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 Department”) was notified that Will Weir, 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 26 June 2023 (refer Appendix B). The audit team was informed on 3 July 2023 and 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 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 6 July 2023 at 9.50 am.

Present at the opening meeting were:

- Andrew Galvin (ADCO Senior Project Engineer)
- Josh Innes (ADCO Senior Project Manager)
- Mark Robinson (ADCO Senior Site Manager)
- Mo Saleh (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)
- Josh Innes (ADCO Senior Project Manager)
- Mark Robinson (ADCO Senior Site Manager)
- Mo Saleh (Turner and Townsend Project Manager)
- Christian Weitz (Turner and Townsend Senior Project Manager)
- Stephanie Cincotta (Turner and Townsend Project Manager)
- Arjuna Thiru Moorthy (Health Infrastructure (HI) Project Director)
- John Allen (ADCO Site Manager).

## 2.5. Site inspections

A site inspection was undertaken at 9.55 am on the 6 July 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.

## **Independent Environmental Audit 3**

*Griffith Base Hospital*



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 third audit are in **red text**.

#### Design plans and approval documentation

- Development Consent SD-9838218
- Environmental Impact Statement – Griffith Base Hospital Redevelopment (Urbis 15 April 2021)

#### 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.

## **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

## 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.

### 3.2. Compliance performance

In summary, the audit found eleven (11) 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	24	2	9
B	17	5	13
C	31	4	9
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

Eleven 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.
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.	Refer to recommendations for C9
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of construction during the first audit.  Health Infrastructure notified the Secretary on 20/6/2022 that construction, including demolition of Building 25 was intended to commence on 23/6/2022. The demolition of Building 25 was actually commenced on 4 May 2022 and completed prior to the stated commencement date. The Staging Report notes that construction was to commence in May	No further action required

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Recommendations
		<p>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>	
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>	No further action required.
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>	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.

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Recommendations
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.	Ensure sediment controls are maintained. Sweep sediment from path, and gutter of Animoo Avenue.
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.	<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>	Clarify if a Heritage Interpretation Plan is required or has been developed for Aboriginal Heritage.
C6	Construction activities may be undertaken outside of	Community consultation notice regarding delivery and erection of tower crane to occur on 16 July 2022	Ensure future notifications to affected residents is at least 7 days prior to the

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Recommendations
	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	between the hours of 7 am to 6 pm.  The works notification letter to residents from ADCO is dated 14 July 2022.	works occurring.
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"> <li>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</li> <li>Sedimentation on public path adjacent to down-gradient site boundary and built up in the gutter of Animoo Avenue.</li> </ul>	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.
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.	Ensure all waste is appropriately secured and maintained in designated waste storage areas.
C43	Independent Audit Reports and the	The site audit for Audit 2 was undertaken on 11	Ensure submission of Audit report and



## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Recommendations
	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.	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.	response to planning Secretary within two months from date of site audit.

### 3.5. Previous audit (Audit two, January 2023) recommendations

The second audit of the project recorded 21 non-compliances with conditions (January 2023). Table 3-3 shows the status of each of the audit findings from the second 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 the content and/or timing of submission of reporting deliverable. Not all required documents are provided on the project website.	Refer to specific non-compliance status below.
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.	Refer condition B5 (a)	Closed
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 - 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	Closed

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	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).	month prior to the commencement of construction.  The current Staging Report, Rev No. V3 has been approved by the Planning Secretary.	
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 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.	Closed
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:  i) the documents referred to in condition A2 of this consent;  iii) all approved strategies, plans and programs required under the conditions of this consent;  iv) regular reporting on the environmental performance of the	The Environmental Management Plan and associated sub-plans were not posted on the website at the time of the audit.  No reporting of environmental performance found on website at the time of the audit.  No comprehensive summary of monitoring results on the website at the time of the audit.	Closed

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;  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;		
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.	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.  The site induction has been updated to include information regarding key environmental risks and requirement to comply with the conditions of approval.	Closed
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.	Numerous non-compliant findings from first audit not yet notified at the time of the audit.	Closed
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.	As above	Closed
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation	No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of	Closed

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	at least 48 hours before those dates.	<p>construction during the first audit.</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>	
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>	Closed
B5	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>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>	Closed
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	The Interpretation Plan addresses Condition B11 but was not prepared and submitted prior to the commencement of construction.	Closed



## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	<p>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> <ul style="list-style-type: none"> <li>(a) Foundation stone and plaque dated 1931; and</li> <li>(b) any other plaques, statutes, commemorative plaques, artefacts etc.</li> </ul>		
B14	<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>	Closed
B16	<p>Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) Details of:</li> </ul>	<p>Principal Contractor Details include company head office number only. The 24 hour 1800 contact number is provided on the site signage.</p> <p>Section 11.3.6 of the updated EMP (V3) addresses groundwater management.</p> <p>Section 11.3.12 of the updated EMP (V3) addressed external</p>	Closed

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	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;	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	
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: b) be prepared in consultation with Council and TfNSW;	CTMP Rev 6 outlines the consultation process with Council and TfNSW.	Closed
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. The CNVMP does not describe any consultation undertaken with the community.	Open
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	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	Open

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
	Parties.	<p>“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>	
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.	Payment receipted after commencement of construction.	Closed
C1	<p>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:</p> <p>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); and</p>	At the time of the second audit the signage had been updated to include the operational hours.	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).	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	Closed

## Independent Environmental Audit 3

Griffith Base Hospital



Condition #	Requirement	Audit finding	Status
		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.	
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:	<p>Stormwater drainage design details accepted by Certifier after commencement of construction. No evidence provided during the first audit 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>	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 (V3) is dated 30/10/2022.

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

The third audit has found general compliance with the implementation of environmental management plans, with the exception of:

- Sedimentation on Animoo Avenue and an adjacent public walkway not in accordance with the Project ESCP or CEMP
- Contractor parking in exclusion areas not in accordance with the CTMP
- 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 receptacles, concrete wash / spillage on the ground.

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 third audit the Noise and Vibration Monitoring Reports for the audit period (January to June 2023) were available on the website.

Environmental reports can also be prepared drawing from the Hammertech system. At the time of the third audit the summary of weekly environmental reporting was available for the January to April 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, however these inspections are not regularly documented.

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

- Erosion and sediment controls
- Waste management including waste separation and appropriate disposal of concrete waste.

### **3.8. Consultation outcomes**

DPE and Griffith City Council were consulted for this third audit. No response from DPE or Griffith City Council had been received at the time of issuing the third audit report.

Consultation is provided in Appendix D.



### **3.9. Complaints**

There had been no complaints received at the time of the third audit inspection as identified in the blank complaints register via the link on the Project website and as discussed in the audit site interview. Refer to [https://gbhredevelopment.health.nsw.gov.au/getmedia/9cf02a0e-4855-432c-b3c6-6060e18345f0/220620-GBHR-Main-Works-Complaints-Register\\_online.xlsx.aspx](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 have been incidents to date.

### **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 E-Lab Consulting. The audit noted that the requirements of the plan were generally being implemented at the time of the third audit inspection with exception of contractor and sub-contractor parking in an exclusion zone in accordance with the CTMP.

### **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 (V3) 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 has been prepared. However, the Heritage Interpretation Plan has not yet been prepared. This has been raised as a non-compliance – refer to section 3.4.

## **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.

The Tree Management and Protection Plan will be updated with the Arborist's report and details about a designated tree for retainment, which was damaged in a storm and required removal, following determination of Mod 1.

## **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.

## **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. Noise and vibration monitoring has occurred for the project and shows that the noise and vibration management levels have generally been met. Furthermore, there have been no complaints regarding noise up to the date of the third audit site inspection.

## **Soil and water**

Site drainage and erosion and sediment controls are addressed in the EMP. Erosion and sediment controls were being adequately implemented at the time of the third audit site inspection, including perimeter sediment fencing. A rumble grid at the site access, to reduce tracking of material off-site, had been relocated temporarily to allow a truck to pass over it that would otherwise be stuck on top of the grid.

## **Waste**

The EIS identified the volume and waste streams expected during construction. These findings have been transferred to the Environmental Management Plan (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.

### **3.12. Site inspection**

The site inspection found the site to be untidy in areas with some uncontrolled waste. 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
- Spill kits were labelled and located around the site
- A rumble grid would usually be located over a piece of geotextile at the construction traffic access point. However, it had temporarily been removed for a truck that could not cross over the top of the grid
- Sediment fencing and drain coverings were in place in accordance with the ESCP. Some areas of sediment fencing need to be secured.
- Minimal mud tracking on Animoo Avenue even though there had been wet weather
- Sedimentation on public walkway adjacent to the site and sedimentation in the gutter of Animoo Avenue
- Few exposed surfaces observed as building works have progressed
- Contractor and / or sub-contractors 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
- Site signage was in place
- Materials stockpiled in an untidy and in some cases, unsafe, manner adjacent to construction access and around the storage containers and flammable liquids cabinet
- Flammable liquids cabinet only contained flammable liquids and at least three fire extinguishers were positioned in the area
- Concrete wash was observed across the ground
- Plastic wrap, card board boxes and plastic bottles were observed on the ground near the storage containers and not in an allocated waste receptacle.

Photos of the site are provided in Appendix C.

### **3.13. Site interviews**

Site interviews occurred with staff from ADCO, Turner and Townsend, and HI during the course of the 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 third 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:

- Maintain the Project website with the most recent environmental monitoring performance reports, noting that the last upload to the website was Report 4, March – April 2023
- Securing the sediment fence along two gates of the northern boundary of the site adjacent to the SVPCH Loading Dock, refer to site inspection photographs in Appendix C
- Working out a solution to enable all construction traffic to pass over the rumble grid at the site's construction entrance to ensure mitigation of sediment leaving site and mud tracking on to local roads.
- Ensure Contractors and Sub-contractors understand where the parking exclusion zones are around the Project site, including adjacent to the SVPCH precinct.
- Increase maintenance of sediment fencing down-gradient of the project site adjacent to the public walkway from Animoo Avenue to Griffith Pathology Laboratory SWPS. Remove sediment from the pavement adjacent to sediment fence, refer to Appendix C.
- A review is required of erosion and sediment controls at the site construction entrance / exit to ensure that with the 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 improving the usability of the noise and vibration environmental monitoring summaries, which are accessible on the Project website, with an inclusion of how the reported raw data for noise and vibration relates to the noise and vibration criteria outlined in the CNVMP.
- Ensure any spills, including concrete wash, are controlled, contained and cleaned up within 24 hours, in accordance with the Project EMP.

### **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 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

Eleven (11) non-compliances were raised in this audit.

Table 4-1 Summary of non-compliances

Condition #	Requirement	Audit finding
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.
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.
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of construction during the first audit.  Health Infrastructure notified the Secretary on 20/6/2022 that construction, including demolition of Building 25 was intended to commence on 23/6/2022. The demolition of Building 25 was actually commenced on 4 May 2022 and completed prior to the stated commencement date. The Staging Report notes that construction was to commence in May 2022. As per the definition of "construction" provided in the SSD determination, construction is deemed to have commenced when the demolition work started.  The notification letter was provided to the auditor on 5 January 2023 post

Condition #	Requirement	Audit finding
		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.
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.	No audit evidence provided for notification of the commencement of Stage 1 during the first audit.  Refer above
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 development of any strategies outlined in the CNVMP.
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.
B27	Prior to the commencement of construction, the Applicant must submit to the Planning Secretary a Heritage Interpretation Strategy and Plan for the	The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post Approval receipt it

Condition #	Requirement	Audit finding
	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>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>
C6	<p>Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:</p> <p>(d) for the delivery, set-up and removal of construction cranes, where notice of the crane- related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or</p>	<p>Community consultation notice regarding delivery and erection of tower crane to occur on 16 July 2022 between the hours of 7 am to 6 pm.</p> <p>The works notification letter to residents from ADCO is dated 14 July 2022.</p>
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	<p>In accordance with the CEMP, the site should be maintained in a clean and tidy condition at all times. The auditor observed during the third audit, the following:</p> <ul style="list-style-type: none"> <li>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</li> </ul> <p>Sedimentation on public path adjacent to down-gradient site boundary and built up in the gutter of Animoo Avenue.</p>

Condition #	Requirement	Audit finding
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.
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.



## 5. Conclusion

The audit found eleven (11) 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
<b>A</b>	24	2	9
<b>B</b>	17	5	13
<b>C</b>	31	4	9
<b>D</b>	-	-	35
<b>E</b>	-	-	20

## **Appendix A Auditor CV**

- 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.

## 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 m<sup>3</sup> 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.

# Appendix B Audit table

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<b>Part A - Administrative Controls</b>					
<u>Obligation to Minimise Harm to the Environment</u>	-	-			
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
<u>Terms of Consent</u>	-	-			
A2.		The development may only be carried out:			
	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.	Non compliant
	b)	in accordance with all written directions of the Planning Secretary;	Interview - J Innes and A Galvin		Not triggered
	c)	generally in accordance with the EIS, Response to Submissions	Site inspection Document review	Works are being delivered generally in accordance with the EIS and Response to Submissions	Compliant
	d)	in accordance with the approved plans in the table below:	Crown Certificate 1 Approved Plans	Works were being delivered in accordance with the approved plans at the time of the audit.	Compliant
A3.		Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:			

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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;			Noted
	b)	any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and			Noted
	c)	the implementation of any actions or measures contained in any such document referred to in (a) above.			Noted
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
<u>Limits of Consent</u>	-	-		-	
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
<u>Prescribed Conditions</u>	-	-		-	
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 Certificate 3 Certificate 4 Crown Crown	The project is subject to a Crown Certificate. The Certificates includes verification of compliance with relevant building codes.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<u>Planning Secretary as Moderator</u>	-	-		-	
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 - J Innes and A Galvin	No disputes raised at the time of the third audit.	<i>Not triggered</i>
<u>Evidence of Consultation</u>	-	-		-	
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 email from HI with correspondence between Council and others regarding the S68 approval for sewer, dated 3 June 2021.	Refer condition B5 (a) noting Council S68 approval. Evidence of consultation with Council prior to submission of s68 application has been sighted by the auditor.	Compliant
<u>Staging</u>				-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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).	<p>Construction Staging Report - Griffith Base Hospital Redevelopment - SSD-9838218 - Rev 3</p> <p>Approval of Plan SSD-9838218-PA-3, 16/06/2022</p> <p>Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022</p>	<p>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.</p> <p>The current Staging Report, Rev No. V3 has been approved by the Planning Secretary.</p> <p>The Applicant's response to this NC - 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 Health Infrastructure to ensure that conditions of consent are satisfied and complied with. HI Project Director to attend all IEA meetings to ensure project is complying with conditions and providing appropriate evidence. Non-compliance exposed at Audit No.1 Actioned via the implementation of increased monitoring and</p>	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
				management procedures. Addressed in response to Audit No.1 but remains a noncompliance	
A10.		A Staging Report prepared in accordance with condition A9 must:			



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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.	Compliant
	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		Not triggered
	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.	Compliant
	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.	Compliant
<u>Legal Notices</u>	-	-			
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 J. Innes, A. Galvin	Activities being undertaken at the Project site at the time of the first audit were in line with the identified Stage 1 works activities.  Activities being undertaken at the Project site at the time of the second audit were in line with the identified Stage 1 works. Stage 2A and Stage 2B works had not been commenced at the time of the second audit.  Activities being undertaken at the Project site at the time of the third audit are in line the identified Stage 1 works. Stage 2A and Stage 2B works had not been	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
				commenced at the time of the third audit.	
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 J. Innes, C. Dinning	The Staging Report indicated that Stage 1 was to commence in May 2022.  Demolition of Building 25 was commenced in 4 May 2022.	Compliant
<u>Staging, Combining and Updating Strategies, Plans or Programs</u>	-	-			
A13.		The Applicant may:			

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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);	See relevant conditions	The Environment and Waste Management Plan relates only to the initial demolition and earth works stage.  Section 11.3.1 of the updated EMP (V3) addresses waste management in detail for the full construction phase or the Project.	Compliant
	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			Noted
	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	A number of plans reviewed had been updated from earlier versions as a result of document review and recommendations.	Compliant
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.	Post approval receipts  DPE Letter dated 02 February 2023 approving EMP and Sub-plans.	Post approval receipts for the Demolition Management Plan, Construction Staging Report, AACHMP, Heritage Interpretation Strategy.  The EMP (V3), CTMP (Issue 6), CNVMP (Issue 4) and Construction Waste Management Sub-plan (Rev 2) confirmed received by the Secretary - February 2023.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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
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. V3, dated 30/10/2022)  Site Inspection  Interview - J Innes, A. Galvin	During the third audit, works were generally being delivered in accordance with the current management plans and strategies. However, there are some non-compliances with the Project CEMP and ESCP. Refer to Condition C9.	Non compliant
<u>Structural Adequacy</u>		-			
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	The Crown Certificates confirm compliance with the relevant BCA where relevant.	Compliant
		Notes: • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.			Noted

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<u>The External Walls and Cladding</u>	-	-		-	
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 - J. Innes, A. Galvin	Crown Certificate 3 confirm compliance with the relevant BCA for Façade and roofing works.	Compliant
<u>External Materials</u>	-	-		-	
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 - J. Innes, 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	Not triggered
	b)	the quality and durability of any alternative material is the same standard as the approved external building materials; and		As above	Not triggered
	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	Not triggered
<u>Applicability of Guidelines</u>	-	-		-	
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 - J Innes, A Galvin		Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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 - J Innes, A Galvin	The EMP was updated in response to DPE comments and Version 3 has been approved.	Compliant
<u>Monitoring and Environmental Audits</u>	-	-		-	
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
		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.			Noted
<u>Access to Information</u>	-	-		-	
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:			

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	a)	make the following information and documents (as they are obtained or approved) publicly available on its website:	Website <a href="https://gbhredevelopment.health.nsw.gov.au/ssda-documents">https://gbhredevelopment.health.nsw.gov.au/ssda-documents</a>		
	(i)	the documents referred to in condition A2 of this consent;	As above	The approved plans are provided on website.	Compliant
	(ii)	all current statutory approvals for the development;	As above	SSD-9838218 Development Approval is posted on the website.	Compliant
	(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 3 Demolition Management Sub-plan Construction Noise and Vibration Management Sub-plan Construction Traffic Management Sub-plan Construction Waste Management Sub-plan	Compliant
	(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 third site audit, which included Environmental Monitoring Reports 1 (April - November 2022), 2 (December	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
				2022 - January 2023), 3 (February 2023) and 4 (March - April 2023).	
	(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 third 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).	Compliant
	(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 third audit.  April 2022, July 2022, October 2022, January 2023 and April 2023 Newsletters on website at the time of the third audit.	Compliant
	(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.	Compliant
	(viii)	a complaints register, updated monthly;	Interview - J Innes, A Galvin  As above	No complaints were registered at the time of the third audit. ADCO maintains its own register for complaints. The complaints register is accessible from the Project website.	Compliant
	(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 third audit, the IEA reports for the first and second audits, and the corresponding Applicant's response, are available on the project website.	Compliant



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	(x)	any other matter required by the Planning Secretary; and	As above		<i>Not triggered</i>
	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		<i>Not triggered</i>
<u>Compliance</u>	-	-		-	
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.	Compliant
<u>Incident Notification, Reporting and Response</u>	-	-		-	
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 - J Innes, A Galvin		<i>Not triggered</i>
A26.		Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Interview - J Innes, A Galvin		<i>Not triggered</i>
<u>Non-Compliance Notification</u>	-	-		-	
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 - J Innes, A Galvin  Sighted three portal notifications of non-compliances and a letter from the Planning Secretary identifying the Department was notified of a late report on 7 March 2023.	The Audit 2 report is dated 10 March 2023. The Applicant's response is dated 14 March 2023. Both documents were submitted to the Planning Secretary on 14 March 2023. A non-compliance notification was also submitted within 7 days of the Audit 2 report notifying of the non-compliances.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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 - J Innes, A Galvin	The Applicant's Response to Audit 2 outlines the non-compliance, the condition, why it is non-compliance and then 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 - J Innes, A Galvin		Noted
<u>Revision of Strategies, Plans and Programs</u>	-	-		-	
A30.		Within three months of:			
	a)	the submission of a compliance report under condition A33;	Interview - J Innes, A Galvin	The EMP and relevant sub-plans were updated following the first audit within 3 months of receiving audit findings.  There have been no additional plan updates at the time of the third site audit.	Compliant
	b)	the submission of an incident report under condition A26;	Interview - J Innes, A Galvin		Not triggered
	c)	the submission of an Independent Audit under condition C42 or C43;	Interview - J Innes, A Galvin		Not triggered
	d)	the approval of any modification of the conditions of this consent; or	Interview - J Innes, A Galvin		Not triggered
	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.	Interview - J Innes, A Galvin	Not triggered	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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 - J Innes, A Galvin	As of the third audit there were no plan updates following the second audit.	Compliant
		<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>			Noted
<u>Compliance Reporting</u>	-	-		-	
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
<b>Part B - During Construction</b>					
<u>Notification of Commencement</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	<p>Letter to DPE - notifying commencement of construction, Health Infrastructure, dated 20 June 20/6/2022</p> <p>Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022</p> <p>Letter to DPE - renotifying commencement of construction, Health Infrastructure, dated 14 April 2023</p>	<p>No audit evidence provided for first audit 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.</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>	Non compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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 during the first audit for notification of the commencement of Stage 1.</p> <p>The Project is still in Stage 1 as of the date of the third audit site inspection.</p> <p>On 20 June 2022 HI notified DPE formally that commencement of works will begin 23 June 2022. DPE acknowledged of this notification was provided to HI on 21 June 2022.</p> <p>HI renotified the DPE on 14 April 2023 of the correct commencement of construction date of 4 May 2023.</p>	Non compliant
<u>Certified Drawings</u>	-	-		-	
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	<p>Crown Certificate 1</p> <p>Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022</p>	Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022 submitted prior to commencement of construction.	Compliant
<u>External Walls and Cladding</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



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 Acconex email with statement as evidence of compliance with this condition and acceptance from the Certifier, dated 4 April 2023.  Interview - J Innes A Galvin	Sighted notification of lodgement. HI received 4 April 2023, HI submitted to Planning Secretary through portal 5 April 2023.	Compliant
<u>Pre-Construction Dilapidation Report – Protection of Public Infrastructure</u>	-	-		-	
B5.		Prior to the commencement of construction, the Applicant must:		-	
	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.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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;	<p>PRE CONSTRUCTION CONDITION SURVEY - External, AUDILAPS, (ADN22136A), 19 April 2022</p> <p>PRE CONSTRUCTION CONDITION SURVEY - Council, AUDILAPS, (ADN22136B), 19 April 2022</p>	The surveys assess infrastructure and assets in the vicinity of the Project.	Compliant
	c)	submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and	<p>Crown Certificate 1</p> <p>Crown Certificate 2</p>	Aconex email correspondence sighted by the auditor regarding provision of dilapidation reports in compliance with SSDA Condition B5.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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.	<p>Crown Certificate 1</p> <p>Bulk Earthworks Design, ACOR Consultants Pty Ltd, 12 April 2022</p> <p>Construction Noise and Vibration Management Sub-Plan (CNVMP), E-Lab Consulting, dated 28 June 2022</p> <p>Aconex mail - E-Lab consulting, 20 May 2022</p>	E-Lab confirm that as per Section 6 of the CNVMP all residential receiver are outside the safe distance for cosmetic damage.	Compliant
	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	Not triggered
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



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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			Not triggered
	b)	submit a copy of the Pre-Construction Survey Report to the Certifier; and			Not triggered
	c)	provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.			Not triggered
<u>Ecologically Sustainable Development</u>	-	-		-	
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
<u>Heritage - Interpretation Strategy</u>	-	-		-	
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.  The Plan has been outstanding since the first audit. The Plan is still outstanding as of the date of the third audit site inspection.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	a)	Foundation stone and plaque dated 1931; and	As above	Foundation stone is addressed	Compliant
	b)	any other plaques, statutes, commemorative plaques, artefacts etc.	As above	Other plaques are addressed	Compliant
<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 - J Innes	Stage 2 works activities	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 - J Innes		Not triggered
<u>Demolition</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	<p>Demolition Management Plan and Methodology, 1 Noorebar Avenue. Griffith, NSW, 2680 (MOITS, undated)</p> <p>Statement of Safety Compliance with AS2601-2001 (Moits, undated)</p> <p>DPIE submission receipt - SSD-9828218-PA-8 (undated)</p> <p>Crown Certificate 2</p> <p>Correspondence to Certifier with submission of CC1 documents. Letter from DPE regarding approval of Staging Report Rev 3 June 2022.</p>	<p>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.</p> <p>Crown Certificate 2 confirms that the documents were submitted 13 July 2022 after the commencement of construction.</p>	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 condition.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
		<i>Note:</i> - The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval">https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval</a> - The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.			Noted
<u>Construction Environmental Management Plan</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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:	<p>ENVIRONMENTAL MANAGEMENT PLAN, Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V2, dated 20/06/2022)</p> <p>ENVIRONMENTAL MANAGEMENT PLAN (EMP), Griffith Base Hospital Redevelopment (CLIENT - HI21266, ADCO (Rev. No. V3, dated 30/10/2022)</p> <p>Crown Certificate 1</p> <p>Environmental and Waste Management Plan, Version 2.0, MOITS, dated May 2022</p> <p>Interview</p> <p>DPE Letter dated 02 February 2023 approving EMP and Sub-plans.</p>	<p>The current Environmental Management Plan (EMP) at the time of the first audit is dated 20 June 2022 - post commencement of construction. It is noted that this current revision (V2) still has Revision V1 dated 1 February 2022 in the footer of the document. The BCA Crown Certificate records acceptance of the EMP dated 1 February 2022. It is unclear which version of the EMP has been provided to the Certifier. No evidence of submission to Certifier or Planning Secretary provided.</p> <p>EMP (V3) was current at the time of the second audit, dated 30 October 2022.</p> <p>The EMP (V3), CTMP (Issue 6), CNVMP (Issue 4) and Construction Waste Management Sub-plan (Rev 2) confirmed received by the Secretary - February 2023.</p>	Compliant
	a)	Details of:			
	(i)	hour of work;	As above		Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



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 V3 has been updated to include 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.	Compliant
	(iv)	stormwater control and discharge;	As above	Sediment controls and on-site water management adequately addressed.	Compliant
	(v)	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.	Compliant
	(vi)	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 (V3) addresses groundwater management.	Compliant
	(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.	Compliant
	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 (V3) now addresses unexpected contamination finds.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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 (V3) addresses unexpected heritage finds	Compliant
	d)	Construction Traffic and Pedestrian Management Sub-Plan (see condition B17);	Construction Traffic Management Plan, ptc., 21 June 2022	Refer B17 below.	Compliant
	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.	Compliant
	f)	Construction Waste Management Sub-Plan (see condition B19).	Environmental and Waste Management Plan, Version 2.0, MOITS, dated May 2022.	Refer B19 below.	Compliant
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 3, ptc., 21 June 2022  Construction Traffic Management Plan (CTMP), Rev 6, ptc., 28 November 2022		
	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))	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	be prepared in consultation with Council and TfNSW;	As above	CTMP Rev 6 outlines the consultation process with Council and TfNSW.	Compliant
	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	Compliant
	d)	detail heavy vehicle routes, access and parking arrangements.	As above	Adequately addressed in CTMP	Compliant
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		
	a)	be prepared by a suitably qualified and experienced noise expert;	As above	E-Lab Consulting, Acoustic and Vibration Engineers (CVs provided with CNVMP)	Compliant
	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	Compliant
	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	Compliant
	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 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	Non compliant



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
				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 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.	Non compliant
	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	Compliant
	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	Compliant
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, undated		

**Independent Environmental Audit 3**  
Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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 (V3) addresses waste management in detail for the full construction phase.</p>	Compliant
	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>	Compliant
<u>Construction Parking</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	Construction Traffic Management Plan, ptc., 28 November 2022  Site Inspection  Interview - J Innes, A Galvin	Section 5.1.1 of the CTMP addresses staff parking with sufficient on-street parking within 400m 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.  It is noted that Section 5.11 of the CTMP refers to there being approximately 762 on-street personal parking spaces available within "400mm" of the Hospital. This has been assumed by the auditor to mean within 400m. Consider updating the CTMP to remove any potential confusion.	Compliant
<u>Soil and Water</u>	-	-		-	
B21.		Prior to the commencement of construction, the Applicant must:			
	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.	Compliant
	b)	divert existing clean surface water around operational areas of the site; and	Site inspection	Clean water diversion are in place around the site.	Compliant
	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?	Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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	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.  Refer to site inspection photographs.	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 interview - J Innes	The project site is not in a defined Acid Sulphate Soils Area.	Not triggered
<u>Operational Noise – Design of Mechanical Plant and Equipment</u>	-	-		-	
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			Not triggered
	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.			Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<u>Aboriginal Heritage</u>	-	-		-	
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 &amp; Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021</p> <p>DPIE Letter - Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2</p>	Evidence of consultation provided.	Compliant
<u>Heritage Management Plan - Aboriginal Heritage</u>	-	-		-	
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:	<p>Aboriginal Archaeological &amp; Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021</p> <p>DPIE Letter dated 1 April 2022 - Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2</p>	The AACHMP was submitted and approved by the Planning Secretary prior to the commencement of construction.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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.	Compliant
	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.	Compliant
	c)	describe how any unexpected finds would be managed.	As above		Compliant
	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	Compliant
	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	Compliant
	(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	Compliant
	(iii)	ongoing consultation with the Registered Aboriginal Parties during the implementation of the plan.	As above	Section 6.4.4	Compliant
	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	Compliant
<u>Heritage Interpretation Strategy and Plan – Aboriginal Heritage</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	<p>Griffith Base Hospital - Heritage Interpretation Strategy, 21 November 2021</p> <p>Griffith Base Hospital - Interpretation Plan, djrd architects, 03/06/22</p> <p>DPIE Letter dated 24/08/2022 - Griffith Base Hospital Redevelopment (SSD-9838218)</p> <p>Aboriginal Heritage Interpretation Strategy, Condition B27</p> <p>Interview</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 recommends 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>The Aboriginal Heritage Interpretation Plan has not been prepared or approved for the development at the time of the third audit site inspection.</p>	Non 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.	<p>Letter dated 7 July 2022 - SSD-9838218 – Griffith Base Hospital Redevelopment - Biodiversity</p> <p>Certificate 6.33 - Payment Receipt, dated 16 May 2022</p>	<p>Payment receipted after commencement of construction on 16 May 2022.</p>	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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 30 March 2021, to manage the revegetation and landscaping works on-site, to the satisfaction of the Certifier. The plan must:			Not triggered
	a)	provide for the planting of 86 additional trees;			Not triggered
	b)	detail the location, species, maturity and height at maturity of plants to be planted on-site;			Not triggered
	c)	include species (trees, shrubs and groundcovers) indigenous to the local area;			Not triggered
	d)	include the provision of street tree planting. Species and spacing of trees to be determined in consultation with Council;			Not triggered
	e)	include the provision of nest boxes suitable to native fauna likely to use the site; and			Not triggered
	f)	be submitted to the Planning Secretary for information.			Not triggered
<u>Construction Access arrangements</u>	-	-		-	



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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, ptc., 21 June 2022		Compliant
	a)	all vehicles must enter and leave the hospital site in a forward direction;	Interview - J Innes CTMP		Compliant
	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		Compliant
	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		Compliant
<u>Operational Access, Car Parking and Service Vehicle Arrangements</u>	-	-		-	
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:			<i>Not triggered</i>
	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			<i>Not triggered</i>
	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.			<i>Not triggered</i>
<u>Public Domain Works</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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			Not triggered
<u>Site Contamination</u>	-	-			
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	Compliant
<b>Part C - During Construction</b>					
<u>Site Notice</u>	-	-			
C1.		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:	Site Inspection	The site notice was observed by the auditor, refer to site photographs	Compliant
	a)	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	Compliant
	b)	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	Compliant
	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); 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.	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	d)	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	Compliant
<u>Operation of Plant and Equipment</u>					
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 - J. Innes A. Galvin	All plant an 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. Sighted in Hammertech the telehandler seen during the site visit (0034). Hammertech profile included photo, it's a brand new machine, last service was 500 hours, next service due in 1000 hours. Last service in April this year. Sighted service record.	Compliant
<u>Demolition</u>					
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		Compliant
<u>Construction Hours</u>					
C4.		Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:			
	a)	between 7am and 6pm, Mondays to Fridays inclusive; and	Interview - J Innes, A Galvin		Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	(a) between 1pm and 4pm, Saturdays.	As above		Not triggered
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:			
	a)	between 6pm and 7pm, Mondays to Fridays inclusive; and	As above		Not triggered
	b)	(a) between 1pm and 4pm, Saturdays.	As above		Not triggered
C6.		Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:			
	a)	by the Police or a public authority for the delivery of vehicles, plant or materials; or			Not triggered
	b)	in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or			Not triggered
	c)	where the works are inaudible at the nearest sensitive receivers;			Not triggered
	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 - Installation of tower crane within site compound, dated 27 April 2022  Sighted community notification.	Sighted 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.	Non compliant
	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 - J Innes, A Galvin		Not triggered
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 - J Innes	Consultation undertaken 48 hours prior to Crane works.	Compliant
C8.		Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:			
	a)	9am to 12pm, Monday to Friday;	Interview - J Innes  CNVMP		Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	b)	2pm to 5pm Monday to Friday; and	As above		Compliant
	c)	9am to 12pm, Saturday.			Not triggered
<u>Implementation of Management Plans</u>	-	-		-	
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 (V2) EMP (V3)  Site Inspection	<p>In accordance with the CEMP, the site should be maintained in a clean and tidy condition at all times. The auditor observed during the third audit, the following:</p> <ul style="list-style-type: none"> <li>- 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</li> <li>- Sedimentation on public path adjacent to down-gradient site boundary and built up in the gutter of Animoo Avenue.</li> </ul> <p>Refer to site inspection photographs.</p>	Non compliant
<u>Construction Traffic</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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	Construction vehicles were observed outside of the site at the time of the audit. Refer to site inspection photographs for the third audit.  The audit recommends the CTMP is updated with a figure showing the carpark and on-street parking exclusion zones.	Compliant
<u>Hoarding Requirements</u>	-	-		-	
C11.	a)	The following hoarding requirements must be complied with: 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 the audit.	Compliant
	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 the audit.	Compliant
<u>No Obstruction of Public Way</u>	-	-			
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
<u>Construction Noise Limits</u>	-	-			

## Independent Environmental Audit 3

Griffith Base Hospital



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 the <i>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.	<p>CNVMP</p> <p>Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt, December 2022 to June 2023.</p> <p>Interview - A. Galvin and J. Innes</p> <p>Sighted email correspondence from asBuilt Digital that exceedances for March and April 2023, dated 8 May 2023.</p>	<p>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.</p> <p>The auditor sighted summary environmental reporting for December 2022 to June 2023 at the time of the third audit. These reports are also available on the Project's website.</p>	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.	<p>CNVMP</p> <p>Interview - J Innes</p>	Addressed in the CNVMP. The auditor was advised that construction vehicles do not arrive outside of construction hours.	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.	<p>Interview - J Innes, A Galvin</p> <p>Site Inspection</p>		Compliant
<u>Vibration Criteria</u>	-	-		-	
C16.		Vibration caused by construction at any residence or structure outside the site must be limited to:		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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); and</i>	CNVMP  Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt Oct 2022	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 December 2022 to June 2023 at the time of the third audit. These reports are also available on the Project's website.	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	Compliant
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 J Innes	Addressed in the CNVMP - residential receiver 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
<u>Tree Protection</u>	-	-			
C19.		For the duration of the construction works:			



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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.  Site Inspection  Interview - J. Innes and A. Galvin	Addressed in plan.  Tree protection was observed to be in place at the time of the audit. Refer to site inspection photographs.  The auditor was advised during the third audit that the tree removal of the storm-damaged protected tree outside of the Project site is part of Mod 1. Mod 1 has yet to be determined. The Tree Management & Protection Plan will be updated with the tree removal details and statement from the Arborist following determination of Mod 1.	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	Compliant
	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 prepared by CPS; and	As above	As above	Compliant
	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 - J Innes		Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<u>Air Quality</u>	-	-	-	-	
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	No dust generation was observed during the site inspection. No active earthworks at the time of the third audit site inspection.	Compliant
C21.		During construction, the Applicant must ensure that:			
	a)	activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;	Interview - J. Innes, A. Galvin  Site inspection	The site at the time of the third audit site inspection was wet from ongoing rainfall. Few areas are exposed with no civil works occurring as part of CC3 and CC4. Most construction traffic remain on asphalt areas of the site.	Compliant
	b)	all trucks entering or leaving the site with loads have their loads covered;	Environmental and Waste Management Plan  Interview - J Innes and A. Galvin  Site Inspection	Addressed in plan. No observation made of trucks leaving site during the audit. The auditor was advised that covering loads is the practice on site.	Compliant
	c)	trucks associated with the development do not track dirt onto the public road network;	As above	No significant amounts of tracked mud onto roads was observed at the time of the audit. Auditor informed by Site Manager that either Council or a contractor sweep the road when required.	Compliant
	d)	public roads used by these trucks are kept clean; and	As above	As above	Compliant
	e)	land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Site inspection	No civil works at the site at the time of the third audit. Surfaces wet from ongoing rainfall at the time of the audit.	Compliant
<u>Imported Fill</u>	-	-	-	-	
C22.		The Applicant must:			

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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;	Interview - J Innes  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.	Compliant
	b)	keep accurate records of the volume and type of fill to be used; and	Interview J Innes		Not triggered
	c)	make these records available to the Certifier upon request.	Interview J Innes		Not triggered
<u>Disposal of Seepage and Stormwater</u>	-	-		-	
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 - J Innes	No stormwater had been discharged from site at the time of the audit inspection. Stormwater is allowed to infiltrate or evaporate. It is occasionally moved from one area of the site to another.	Not triggered
<u>Emergency Management</u>	-	-		-	
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
<u>Stormwater Management System</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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	Compliant
	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	Compliant
	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	Compliant
	d)	account for a critical storm event and ensure a maximum discharge of 65 litres per second per hectare;	As above	As above	Compliant
	e)	incorporate an on-site detention system if required to maintain flows required by C25(d), which must be designed and certified by a qualified Civil Engineer with experience in Hydraulic Analysis. The Civil Engineer must sign off all drawings and calculations and provide details of Professional Indemnity Insurance;	As above	No on-site detention at the time of the audit inspection.	<i>Not triggered</i>
	f)	be in accordance with applicable Australian Standards; and	As above	As above	Compliant
	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	Compliant

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	<i>Not triggered</i>
<u>Aboriginal Cultural Heritage</u>	-	-		-	
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 - J Innes	The AACHMP addressed the recommendation of the assessment report and is being implemented at the site.	Compliant
<u>Unexpected Finds Protocol - Aboriginal Heritage</u>	-	-		-	
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.	<i>Not triggered</i>
	b)	a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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			<i>Not triggered</i>
	e)	works must only recommence with the written approval of Planning Secretary.			<i>Not triggered</i>
<u>Unexpected Finds Protocol - Historic Heritage</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.	<i>Not triggered</i>
	a)	all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;			<i>Not triggered</i>
	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			<i>Not triggered</i>
	c)	works may only recommence with the written approval of the Planning Secretary.			<i>Not triggered</i>
<u>Waste Storage and Processing</u>	-	-		-	
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 (V2) EMP (V3)  Site Inspection	Addressed in management plans.  Numerous locations of unsecured waste observed on-site placed in uncontrolled manner (not within designated waste storage areas) during the third audit inspection.	<b>Non compliant</b>
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	General reference to meeting EPA requirements in EMP (V2)  Section 11.3.16 of the EMP (V3) addressed waste classification in accordance with the Guideline.	<b>Compliant</b>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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	<p>The audit found an adequate level of knowledge of site personnel with regard to the concrete waste and rinse water.</p> <p>The site inspection component of the audit however, noted a visible concrete wash spillage on the ground near the concrete wash bin. Ensure minor spills are controlled and cleaned up within 24 hours.</p>	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.	Hammertech management system	The auditor observed a sample of digitally captured waste transport and delivery receipts at the time of the third audit.	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.	As above	As above	Compliant
<u>Outdoor Lighting</u>	-	-		-	
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.	<p>Interview - A. Galvin</p> <p>Site Inspection</p> <p>EMP (V3)</p>	No outdoor lighting at the time of audit.	Not triggered
<u>Site Contamination</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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  BCA CROWN CERTIFICATE - 1, CRO-22066, 28 June 2022	Bonded asbestos as per RAP	Compliant
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).	As above	Accredited Site Auditors detail provided to Certifier and Letter of Intent to engage services.	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 - J Innes	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, 26/06/2023	Ms Nicola Smith, Mr Will Weir and Ms Natscha Arens of NGH Pty Ltd endorsed as audit team.	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.			Noted
C42.		In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:			



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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 first and second audit.	The Independent Audit - Proponent review and response for the first audit is dated 6 March 2023 and for the second audit, 14 March 2023.	Compliant
	b)	submit the response to the Planning Secretary; and	Sighted portal notifications of the Applicant's response for Audit 1 and Audit 2		Compliant
	c)	make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.	Interview - A. T. Moorthy (HI)	The Audit 1 and Audit 2 reports and responses were added to the website as they were received by HI as identified during the interview. It went to the Planning Secretary on 16 March 2023.	Compliant
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 three portal notifications of non-compliances	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.	Non 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
<b>Part D - Prior to Commencement of Operation</b>					
<u>Notification of Occupation</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.			<i>Not triggered</i>
<u>External Walls and Cladding</u>	-	-		-	
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.			<i>Not triggered</i>
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.			<i>Not triggered</i>
<u>Works as Executed Plans</u>	-	-		-	
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.			<i>Not triggered</i>
<u>Warm Water Systems and Cooling Systems</u>	-	-		-	
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.		-	<i>Not triggered</i>
<u>Outdoor Lighting</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



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>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<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:			Not triggered
	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			Not triggered
	b)	the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.			Not triggered
<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.			Not triggered
<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:			Not triggered
	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;			Not triggered
	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).			Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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>
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.			<i>Not triggered</i>
<u>Car Parking Arrangements</u>	-	-		-	
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.			<i>Not triggered</i>
<u>Bicycle Parking and End-of-Trip Facilities</u>	-	-		-	
D18.		Prior to occupation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier:			<i>Not triggered</i>
	a)	the provision of a minimum 30 bicycle parking spaces;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	c)	the provision of end-of-trip facilities for staff; and			<i>Not triggered</i>
	d)	(a) appropriate pedestrian and cyclist advisory signs are to be provided.			<i>Not triggered</i>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
		<i>Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.</i>			<i>Not triggered</i>
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.			<i>Not triggered</i>
	a)	be prepared by a suitably qualified traffic consultant in consultation with Griffith City Council and Transport for NSW (Sydney Coordination Office);			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	c)	include specific tools and actions to help achieve the objectives and mode share targets;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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.			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	h)	audit the adjacent bus stops for shelter, seating, lighting and accessibility.			<i>Not triggered</i>
	i)	audit crossings, particularly those required to reach bus stops;			<i>Not triggered</i>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	j)	identify any necessary improvements to surrounding pedestrian infrastructure to support active transport to the site, including crossings;			<i>Not triggered</i>
	k)	investigate financial incentives to take public transport, this could include providing a subsidy to staff for public transport fares;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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);			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	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;			<i>Not triggered</i>
	r)	expedite the actions listed in the GTP, and prioritise those that are needed before occupation, including developing a TAG and communication strategy;			<i>Not triggered</i>
	s)	provide timelines and identify responsible people for the full development and delivery of GTP;			<i>Not triggered</i>
	t)	identify and promote what community transport is available, how community transport access the site, who is eligible for community transport;			<i>Not triggered</i>
	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.;			<i>Not triggered</i>
	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			<i>Not triggered</i>



## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	w)	incorporate a program for annual review for at least the first five years and involve surveys, evaluation and review.			<i>Not triggered</i>
<u>Heritage Interpretation Strategy</u>	-	-		-	
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.			<i>Not triggered</i>
<u>Utilities and Services</u>	-	-		-	
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.			<i>Not triggered</i>
<u>Stormwater Management System</u>	-	-		-	
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).			<i>Not triggered</i>
<u>Stormwater Operation and Maintenance Plan</u>	-	-		-	
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:			<i>Not triggered</i>
	a)	maintenance schedule of all stormwater quality treatment devices;			<i>Not triggered</i>
	b)	record and reporting details;			<i>Not triggered</i>
	c)	relevant contact information; and			<i>Not triggered</i>
	d)	Work Health and Safety requirements.			<i>Not triggered</i>
<u>Signage</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D24.		Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.			<i>Not triggered</i>
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.			<i>Not triggered</i>
<u>Operational Waste Management Plan</u>		-		-	
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:			<i>Not triggered</i>
	a)	detail the type and quantity of waste to be generated during operation of the development;			<i>Not triggered</i>
	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> ;			<i>Not triggered</i>
	c)	detail the materials to be reused or recycled, either on or off site; and			<i>Not triggered</i>
	d)	include the Management and Mitigation Measures included in the EIS and Appendix B in the RtS.			<i>Not triggered</i>
<u>Site Contamination</u>		-		-	
D27.		Prior to commencement of operation, the Applicant must submit a Validation Report for the development to the Certifier. The Validation Report must:			<i>Not triggered</i>
	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 Contate Assessment and Management (CPSS CSAM) scheme;			<i>Not triggered</i>
	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;			<i>Not triggered</i>

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	c)	(a) include, but not be limited to:			<i>Not triggered</i>
	(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;			<i>Not triggered</i>
	(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;			<i>Not triggered</i>
	(iii)	the pump system must also be designed and installed strictly in accordance with Randwick City Council's Private Stormwater Code;			<i>Not triggered</i>
	(iv)	should a charged system be required to drain any portion of the site, the charged system must be designed such that:			<i>Not triggered</i>
	(v)	there are suitable clear-outs/inspection points at pipe bends and junctions; and			<i>Not triggered</i>
	(vi)	the maximum depth of the charged line does not exceed 1m below the gutter outlet;			<i>Not triggered</i>
	d)	be submitted to the Planning Secretary for information.			<i>Not triggered</i>
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.			<i>Not triggered</i>
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.			<i>Not triggered</i>
Landscaping	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.			<i>Not triggered</i>
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:			<i>Not triggered</i>
	a)	describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping; and			<i>Not triggered</i>
	b)	(a) be consistent with the Applicant's Management and Mitigation Measures in the RtS.			<i>Not triggered</i>
<u>Loading Dock Management Plan</u>	-	-		-	
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>
<u>Operational Management Plan</u>	-	-		-	
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>
<u>Traffic Management Measures - Warrambool Street</u>	-	-		-	
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>
<u>Emergency Vehicle Access - Warrambool Street</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.			Not triggered
<b>Part E - Post Construction</b>					
<u>Operation of Plant and Equipment</u>	-	-		-	
E1.		All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.			Not triggered
<u>Warm Water Systems and Cooling Systems</u>	-	-		-	
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			Not triggered
<u>Heritage Interpretation Plan</u>	-	-		-	
E3.		The Applicant must implement the most recent version of the Heritage Interpretation Plan under condition B27.			Not triggered
<u>Heritage Interpretation Strategy</u>	-	-		-	
E4.		The Applicant must implement the most recent version of the Heritage Interpretation Strategy and plan under condition B11.			Not triggered
<u>Environmental Management Plan</u>	-	-		-	
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.			Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<u>Operational Noise Limits</u>	-	-		-	
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 time frame 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>
<u>Unobstructed Driveways and Parking Areas</u>	-	-		-	
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>
<u>Green Travel Plan</u>	-	-		-	
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>
<u>Ecologically Sustainable Development</u>	-	-		-	

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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.			Not triggered
<u>Outdoor Lighting</u>	-	-		-	
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.			Not triggered
<u>Landscaping</u>	-	-		-	
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.			Not triggered
<u>Hazards and Risk</u>	-	-		-	
E13.		The Applicant must store all chemicals, fuels and oils used on-site in accordance with:			Not triggered
	a)	(a) the requirements of all relevant Australian Standards; and			Not triggered
	b)	the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.			Not triggered
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.			Not triggered
<u>Dangerous Goods</u>	-	-		-	
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.			Not triggered

## Independent Environmental Audit 3

Griffith Base Hospital



Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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>
<u>Discharge Limits</u>	-	-		-	
E17		The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters.			<i>Not triggered</i>
<u>Stormwater Management System</u>	-	-		-	
E18.		Stormwater infrastructure is to be maintained for the life of the project.			<i>Not triggered</i>
<u>Road Safety Audit – Warrambool Street</u>	-	-		-	
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 C Site photos**



Nurse station



Check dams in gutter upgradient from the site entrance.



Geotextile pit filter sediment trap in accordance with ESCP.



Sedimentation in the gutter down-gradient of the site entrance on Animoo Avenue, adjacent to entrance of Laverty pathology and Medical Centre.





Sedimentation in the gutter down-gradient of the site entrance on Animoo Avenue. Site entrance near bend in footpath.



Sedimentation on footpath down-gradient of the project site. Green sediment fence seen behind blue hoarding.



Hoarding along Animoo Avenue.



Site signage erected at the construction personnel access point from Animoo Avenue.



Spill response kit amongst material stockpiles at site construction entrance.



Nurse call station.





Concrete wash / spillage.



Untidy area of the site. Waste plastic wrap and cardboard boxes. Unsafe compilation of materials.



Spill kit near storage area.



Paper and cardboard waste bin.





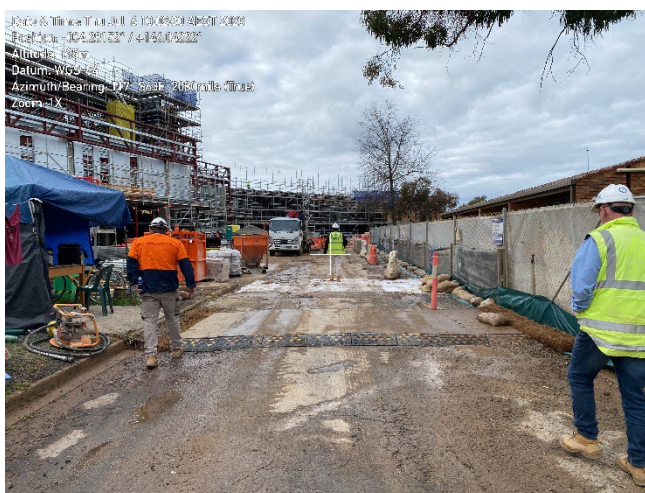
Tree protection zone.



Tree protection.



Tree protection zone near personnel entrance.



Construction site entrance. White geotextile is where the rumble grid would usually be located. However, it had been moved that morning to accommodate a truck that got stuck on top of it.





White geofabric is changed weekly to remove sediment deposition from vehicles trafficking across the rumble grid (when in place). Riverina skip bin for waste management.



Sediment fence, coir logs and sand bags as a sediment control and to secure the base of the sediment fence.



Material stockpiles including a couple of waste water bottles.



Skip bins for waste.





Flammable liquids cabinet.



Sediment fence around contractor parking area.



Dry chemical fire extinguishers around flammable cabinet.



Sediment fence and hoarding for contractor parking.





Sediment fence around contractor parking area.



Sediment fence that needs to be secured.



Sediment fence unsecured along gate.



Geotextile pit filter sediment trap.



## **Appendix D Audit consultation**

### **D.1 NSW Department of Planning and Environment**

**From:** [Nicola Smith](#)  
**To:** [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)  
**Cc:** [Will Weir](#)  
**Bcc:** [be18aec9-33e1-4fff-a7be-47351dbed043.metaPublish@thehub.nghenvironmental.com.au](mailto:be18aec9-33e1-4fff-a7be-47351dbed043.metaPublish@thehub.nghenvironmental.com.au)  
**Subject:** RE: Griffith Base Hospital Redevelopment - SSD 9838218 - Independent Environmental Audit  
**Date:** Thursday, 1 June 2023 1:33:42 PM  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[be18aec9-33e1-4fff-a7be-47351dbed043.png](mailto:be18aec9-33e1-4fff-a7be-47351dbed043.png)

---

Dear Compliance Team,

As the approved Auditor of the Griffith Base Hospital Redevelopment project, we will be conducting the following audit in the next 5 weeks:

- The third Independent Environmental Audit of the Griffith Base Hospital Redevelopment (SSD 9838218)

The site audit inspection for this project will be held on Tuesday 4 July 2023.

In accordance with the post Approval Requirements (2020), please let me know if you have any specific areas of concern or focus for the audit.

Yours sincerely,  
Nicola

**Nicola Smith**  
Technical Lead & Regional Manager

m: 0410 411 660 p: 02 6923 1537  
e. [nicola.s@nghconsulting.com.au](mailto:nicola.s@nghconsulting.com.au)  
a. 35 Kincaid Street, Wagga Wagga, NSW 2650  
w. [nghconsulting.com.au](http://nghconsulting.com.au) | [Our commitment to reconciliation](#)



## **D.2 Griffith City Council**

**From:** [Nicola Smith](#)  
**To:** [admin@griffith.nsw.gov.au](mailto:admin@griffith.nsw.gov.au)  
**Cc:** [Will Weir](#)  
**Bcc:** [44baf4b2-34e1-420a-84f8-ae59b8f052c9.metaPublish@thehub.nghenvironmental.com.au](mailto:44baf4b2-34e1-420a-84f8-ae59b8f052c9.metaPublish@thehub.nghenvironmental.com.au)  
**Subject:** Griffith Base Hospital Redevelopment - SSD 9838218 - Independent Environmental Audit  
**Date:** Thursday, 1 June 2023 1:32:27 PM  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[44baf4b2-34e1-420a-84f8-ae59b8f052c9.png](#)  
[813fe2ca-406c-45ad-af76-9225da147338.png](#)

---

Dear Madam/Sir,

As the approved support Auditor of the Griffith Base Hospital Redevelopment project, we will be conducting the following audit in the next 5 weeks:

- The third Independent Environmental Audit of the Griffith Base Hospital Redevelopment (SSD 9838218)

The site audit inspection for this project will be held on Tuesday 4 July 2023.

In accordance with the post Approval Requirements (2020), please let me know if you have any specific areas of concern or focus for the audit.

Yours sincerely,  
Nicola

**Nicola Smith**  
Technical Lead & Regional Manager

m: 0410 411 660 p: 02 6923 1537  
e. [nicola.s@nghconsulting.com.au](mailto:nicola.s@nghconsulting.com.au)  
a. 35 Kincaid Street, Wagga Wagga, NSW 2650  
w. [nghconsulting.com.au](http://nghconsulting.com.au) | [Our commitment to reconciliation](#)



## **Appendix E Statement of Independence**

Department of Planning and Environment

Ms Larissa Ozog  
1 Reserve Road  
St Leonards NSW 2065  
26/06/2023

Dear Ms Ozog

**Griffith Base Hospital Redevelopment – SSD-9838218  
Independent Environmental Audit #3 – audit team request**

I refer to the request (SSD-9838218-PA-23) and email from Ms Stephanie Jackman dated 26 June 2026, for the Secretary's approval of suitably qualified persons to undertake the Independent Environmental Audit (IEA) #3 and prepare the IEA report for the Griffith Base Hospital Redevelopment (SSD-9838218).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts from NGH Environmental Pty Ltd are suitably qualified and experienced. Consequently, in accordance with Part C Condition C39 of SSD-9838218 and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Ms Natascha Arens – Lead Auditor
- Ms Nicola Smith – Assistant Auditor
- Mr Will Weir - Assistant Auditor

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body and maintaining independence from the development.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary



#### **NGH Pty Ltd**

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: [ngh@nghconsulting.com.au](mailto:ngh@nghconsulting.com.au)

#### **GOLD COAST**

2B 34 Tallebudgera Creek Road  
Burleigh Heads QLD 4220  
(PO Box 424 West Burleigh QLD 4219)

T. (07) 3129 7633

#### **SYDNEY REGION**

Unit 17, 21 Mary Street  
Surry Hills NSW 2010

T. (02) 8202 8333

#### **BEGA**

Suite 11, 89-91 Auckland Street  
(PO Box 470)  
Bega NSW 2550

T. (02) 6492 8333

#### **MELBOURNE**

Level 14, 10-16 Queen Street  
Melbourne VIC 3000

T: (03) 7031 9123

#### **TOWNSVILLE**

Level 4, 67-75 Denham Street  
Townsville QLD 4810

T. (07) 4410 9000

#### **BRISBANE**

T3, Level 7, 348 Edward Street  
Brisbane QLD 4000

T. (07) 3129 7633

#### **NEWCASTLE - HUNTER & NORTH COAST**

Level 1, 31-33 Beaumont Street  
Hamilton NSW 2303

T. (02) 4929 2301

#### **WAGGA WAGGA - RIVERINA & WESTERN NSW**

35 Kincaid Street (PO Box 5464)  
Wagga Wagga NSW 2650

T. (02) 6971 9696

#### **CANBERRA**

Unit 8, 27 Yallourn Street  
(PO Box 62)  
Fyshwick ACT 2609

T. (02) 6280 5053

#### **SUNSHINE COAST**

Suite 101, Level 2/30 Main Drive  
Birtinya QLD 4575

(07) 4410 9000

#### **WODONGA**

Unit 2, 83 Hume Street  
(PO Box 506)  
Wodonga VIC 3690

T. (02) 6067 2533