



NGH

Second Independent Audit Report

Griffith Base Hospital SSD-9838218

March 2023

Project Number: 22-154



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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 second construction independent audit of the project.

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 23 Conditions (6 new, 8 ongoing and 9 old), compliant with 54 Conditions and 92 conditions were not triggered or “noted” out of a total of 169 conditions of approval. It is noted that on two instances a single observation has resulting in a non-compliant finding against two separate conditions.

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; and
- 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 was undertaken by Will Weir (Environmental Engineer), with audit support provided by Natascha Arens (Exemplar Global Certified Principal Environmental Auditor) and Nicola Smith (Environmental Scientist). Will has over 25 years' experience as an environmental professional and 20 years of auditing experience. Natascha has around 25 years' experience as an environmental professional and 20 years of auditing experience. Will and Natascha were approved as the Independent Environmental Auditors by the Department of Planning and Environment (refer Appendix B)

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).

1.4. Audit Scope

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.

1.5. Audit Period

The audit period for this audit was from the date following the first audit 2 July 2022 to the date of site visit 11 January 2023. It is noted that the construction site was closed down over the Christmas break. An audit Agenda was provided to ADCO prior to the site inspection, including a high level request for information.

2. Audit Methodology

2.1. Selection and endorsement of audit team

The Department Planning and Environment (“the department”) was notified that Will Weir and Natascha Arens 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 11 May 2022 (refer Appendix B). The audit team was informed on 14 June 2022 and subsequently engaged by ADCO to deliver the audit program.

2.2. Scope Development

An Audit program was submitted prior to the second audit to the Auditee indicating the date of the site audit, scope, criteria, audit details and required project representatives.

The audit scope as developed during the preparation of the Audit Program and a desktop audit.

This involved:

1. Reviewing the SSD-9838218 Conditions of Approval
2. Reviewing the DPE Independent Audit – Post Approval requirements (May, 2020)
3. Undertaking a desktop review of the approved and readily available Environmental Management Plan and sub plans
4. Updating the Audit Table.

2.3. Audit Process

The Audit Program was provided to the auditee prior to the site inspection.

An Opening and Closing Meeting was held on 11 January 2023 at 8am on site. Present at the opening and closing meeting were:

- Mr Josh Innes (ADCO - Senior Project Manager)
- Craig Dinning (ADCO – Senior Project Engineer)

The document review was conducted during and after the site inspection, following provision of a detailed request for information on the day of the site inspection and further follow up with the auditee.

The final audit report was issued to ADCO on the 7 March 2023.

2.4. Audit Interviews

Site interviews occurred with the following staff:

- Mr Josh Innes (ADCO Senior Project Manager)
- Mr Craig Dinning (ADCO Senior Project Engineer)

Follow up discussion was held with the following staff on 2 March 2023:

- Josh Innes (ADCO Senior Project Manager)
- Arjuna Thiru Moorthy (Health Infrastructure)
- Nicholas Di Condio (Health Infrastructure)
- Stephanie Cincotta (CBRE)

- Christian Weitz (Turntown)
- Ricky Gregory (Truntown)

No interview requests were not granted.

2.5. Site Inspection

A second audit site inspection was conducted at 8:00 am on 11 January 2023. The purpose of site visits was to undertake an inspection of works activities on site, view the site conditions and access arrangements and gain an understanding of the current scope of the works. It was also an opportunity to interview on-site personnel and access available information and data for audit review.

2.6. Consultation

Initial consultation was undertaken by ADCO with the Department of Planning and Environment for endorsement of the audit team. The letter states that the audit is to be conducted in accordance with the Department's Independent Audit Post Approval Requirements (May 2020, and that auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. A copy of the Letter of Appointment is provided at Appendix B.

Consultation advising of the second Independent Audit and requesting input with regard to any specific areas of concern for the audit were sent via email to Griffith City Council and the Department of Planning and Environment compliance team On 4 January 2023. No formal responses were received at the time of site audit inspection or preparation of this report.

2.7. Compliance Status Descriptors

The compliance descriptors used in this report are:

Compliant	Requirement has been met
Non-Compliant	Requirement has not been met
Not Triggered	Requirement not relevant to the current stage of work

3. Audit Findings

3.1. Approval and Document List

The list below includes all documentation reviewed to check compliance. The text in red are additional documents reviewed during the preparation of this second audit.

EIS and Planning Consent documentation

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

Plans, sub plans and reports including:

- 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
- 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
- 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

Correspondence including:

- Appointment of Experts - Griffith Base Hospital Redevelopment (SSD 9838218) Independent Auditors, 11/05/2022
- 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
- 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 on SSDA Conditions Compliance (Adco)

Other documentation

- 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

3.2. Compliance Performance

This audit found the project to be non-compliant with 21 Conditions, compliant with 57 Conditions and 71 conditions were not triggered out of a total of 169 conditions of approval (Table 3-1).

For the purposes of Table 3-1, if a Condition contained a part which is relevant, the whole Condition is counted as being relevant. Similarly, where a non-compliance was found with part of a Condition, the entire condition is considered non-compliant.

Table 3-1 Summary of Compliance

	Part A	Part B	Part C	Part D	Part E
Number of Conditions of Approval	35	35	44	35	20
Number of Non-compliances	3 (new) 3 (ongoing) 2 (old)	3 (ongoing) 7 (old)	3 (new) 2 (old)		
Number of compliances	12	14	28		
Number Not Triggered	15	11	13	35	20

3.3. Notices, Orders or Prosecutions

No notices, orders, infringement notices or prosecutions had been issued during the audit period.

3.4. Non-Compliances

No	Condition	Audit findings	Recommendation
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.	Address relevant non-compliant conditions.
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)	Refer condition B5 (a)
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	Construction - demolition works were commenced 4 May 2022. The first Staging Report Rev No. V0 is dated 26 April and as such did not meet the requirement to submit one month prior to the	No further action required

No	Condition	Audit findings	Recommendation
	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).	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.	Ensure all hazardous chemicals are stored appropriately in accordance with the EMP.
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	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	Ensure all requisite reports and information are provided on the Project's website.

No	Condition	Audit findings	Recommendation
	<p>obtained or approved) publicly available on its website:</p> <p>i) the documents referred to in condition A2 of this consent;</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p>	<p>found on website at the time of the audit.</p> <p>No comprehensive summary of monitoring results on the website at the time of the audit.</p>	
A24	<p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>	<p>The site induction material reviewed does not specifically single out the conditions of consent and does not provide detail on higher risk environmental management requirements.</p> <p>The site induction has been updated to include information regarding key environmental risks and requirement to comply with the conditions of approval.</p>	No further action required
A27	<p>The Planning Secretary must be notified through the major</p>	<p>Numerous non-compliant findings from first</p>	Report known non-

No	Condition	Audit findings	Recommendation
	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.	audit not yet notified at the time of the audit.	compliance as per the requirement of A27.
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	As Above
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>No audit evidence provided of notification in writing to the Planning Secretary of the planned date of commencement of 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</p>	Confirm the correct construction commencement date and notify the Planning Secretary.

No	Condition	Audit findings	Recommendation
		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.	
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	Ensure correct notification is undertaken for future stages of the development.
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;	No audit evidence provided for review. 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.	No further action required.
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)	The Interpretation Plan addresses Condition B11 but was not prepared and submitted prior to the commencement of construction.	No further action required.

No	Condition	Audit findings	Recommendation
	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:		
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.	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. Crown Certificate 2 confirms that the documents were submitted 13 July 2022 after the commencement of construction.	No further action required.
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: a) Details of: ii) 24-hour contact details of site manager;	Principal Contractor Details include company head office number only. The 24 hour 1800 contact number is provided on the site signage. Section 11.3.6 of the updated EMP (V3) addresses groundwater management. Section 11.3.12 of the updated EMP (V3)	No further action required.

No	Condition	Audit findings	Recommendation
	<p>vi) groundwater management plan including measures to prevent groundwater contamination;</p> <p>vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p>	<p>addressed external lighting compliance.</p> <p>Section 11.3.16 of the updated EMP (V3) now addresses unexpected contamination finds.</p> <p>Section 11.3.17 of the updated EMP (V3) addresses unexpected heritage finds</p>	
B17	<p>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:</p> <p>b) be prepared in consultation with Council and TfNSW;</p>	CTMP Rev 6 outlines the consultation process with Council and TfNSW.	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>The CNVMP does not describe any consultation undertaken with the community.</p>	Ensure community consultation is, or confirm it has been undertaken and update the CNVMP with the requisite information.

No	Condition	Audit findings	Recommendation
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.
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.	No further action required.

No	Condition	Audit findings	Recommendation
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.	No further action required.
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 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.	Ensure all hazardous chemicals are stored appropriately in accordance with the EMP.
C25	Prior to commencement of construction, the Applicant must	Stormwater drainage design details	No further action

No	Condition	Audit findings	Recommendation
	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>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>	required.

3.5. Previous Audit

The previous audit identified a number on non-compliance findings in relation to management plans not addressing all aspects of the relevant condition. Many of these have since been rectified in updated plans including the Environmental Management Plan (V3).

The previous audit also identified numerous non-compliant findings in relation to the delivery of requisite plans and information prior to the commencement of construction. Some of these (not all) have now been deemed compliant based of a confirmed construction commencement date of 4 May 2023 relating to the demolition of Building 25.

The previous audit identified that the overall the site was being well managed during the early stage. The second audit identified some instances of incorrect management of chemicals and waste material on-site which should be addressed going forward to ensure ongoing sound environmental management.

3.6. Environmental Management 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 & 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 second audit has found general compliance with the implementation of environmental management plans, with the exception of the chemical and waste management observation discussed above.

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. Environmental reports can also be prepared drawing from the system. At the time of the second audit the summary environmental reporting for October to December 2022 was in preparation and not yet available for review.

3.7. Environmental Management System

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

3.8. Other matters

No other relevant regulatory requirements apply to the project.

3.9. Consultation Outcomes

As noted in Section 1.11 above, The Department of Planning and Environment were contacted as part of this first independent audit. The Department endorsed the proposed audit team and advised that the audit is to be conducted in accordance with the Department's Independent Audit Post Approval Requirements (May 2020), and may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

No formal response to consultation with the Council and DPE was provided at the time of the second audit or during preparation of the report.

3.10. Complaints

There had been no relevant complaints received at the time of the second audit inspection.

3.11. Incidents

There had been no incidents reported to date at the time of the site inspection.

3.12. Actual vs 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.

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.

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. The first audit noted that an unexpected finds protocol is not included in the EMP, however was addressed in the Aboriginal Archaeological & Cultural Heritage Management Plan. 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 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.

A Construction Traffic Management Plan has been prepared by E-Lab Consulting. The audit noted that the requirements of the plan were being implemented at the time of the second audit inspection.

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.

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 second audit site inspection.

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.

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 Environmental and Waste Management Plan, including waste and material tracking were being met at the time of the audit site inspection.

Site drainage and erosion and sediment controls are addressed in the EMP. ESC control were being adequately implemented at the time of the site inspection, including perimeter sediment fencing and a rumble grid at the site access to reduce tracking of material off-site.

3.13. Site Inspection

At the time of the second audit site inspection the Stage 1 construction of the new Clinical Serviced Building was well under way. Floor levels had and were being established with concrete pours being readied for at the time of the audit. The site hoarding was in place along with the dedicated construction site office and amenities. The site was accessed from a single access off Animoo Avenue.

During the site walkover the auditor observed noise and vibration monitoring stations remained in place in accordance with the Noise and Vibration Management Plan requirements. Adequate erosion and sediment controls were observed to be in place, along with suitable waste segregation and storage. Some instances of uncontrolled was however observed during second audit. A further observation was made in relation to the inappropriate storage of a hazardous chemical on-site.

All civil plant onsite was observed to have green Plant/Equipment Acceptance stickers as per the projects maintenance and inspection requirements. All plant or equipment in action at the time of the audit was observed to be operating without unnecessary noise or exhaust pollution levels.

Trees earmarked for protection in the EIS and Tree Management & Protection Plan were observed to have protection fencing, signage and where required trunk impact protection. The auditor was advised about of protected tree that was damaged during a storm event subsequently requiring removal. This may require a modification to the tree protection plan.

At the time of the audit inspection the site appeared to be generally well managed, and the interviewees were aware of the project's environmental risks requiring ongoing management.

3.14. Continual Improvement Opportunities

Centralised tracking of all compliance documentation remains an opportunity for improvement to ensure future audits are able to be completed efficiently with adequate audit evidence provided in a timely manner. This needs to include evidence of submission of information where relevant to specific timeframes present in conditions of approval, along with evidence of requisite consultation being undertaken.

The project website should be updated to include all requisite information, and tracking of information updates to ensure the most recent information is available.

3.15. Key Strengths

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

- The construction site appeared to be generally well managed at the time of the audit with good understanding of project specific environmental and associated risks to be managed.
- Updates to management plans have been forthcoming following comments from DPE and in response to the previous audit.
- Adherence to the requirements to contain the project works within the site and not impact the local road networking and hospital parking.

4. Recommendations

4.1. Recommended Actions

Recommended actions for each relevant non-compliance requiring further specific action identified during this audit are documented in Table 4-1.

Table 4-1 Recommended Actions

No	Condition	Recommendation
A23	Website 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:	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

No	Condition	Recommendation
	<p>a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>i) the documents referred to in condition A2 of this consent;</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p>	<p>found on website at the time of the audit.</p> <p>No comprehensive summary of monitoring results on the website at the time of the audit.</p> <p>Ensure or requisite reports and information are provided on the Project's website.</p>
A27	<p>The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.</p>	<p>Numerous non-compliant findings from first audit not yet notified at the time of the audit.</p> <p>Report known non-compliance as per the requirement of A27 and A28.</p>
B1	<p>The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.</p>	<p>Health Infrastructure notified the Secretary on 20/6/2022 that construction, including demolition of Building 25 was intended to commence on 23/6/2022. The demolition of Building 25 was actually commenced on 4 May 2022 and completed prior to the stated commencement date. The Staging Report notes that construction was to commence in May 2022. As per the definition of "construction" provided in the SSD determination, construction is deemed to have commenced when the demolition work started. The notification letter was provided to the auditor on 5 January 2023 post completion of the first audit report.</p> <p>Confirm the correct construction commencement date and notify the Planning Secretary..</p>
B18	<p>Construction Noise and Vibration Management</p> <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>The CNVMP does not describe any consultation undertaken with the community.</p> <p>Ensure community consultation is or confirm it has been undertaken and update</p>

No	Condition	Recommendation
		the CNVMP with the requisite information.
B27	<p>Heritage Interpretation – Aboriginal</p> <p>Prior to the commencement of construction, the Applicant must submit to the Planning Secretary a Heritage Interpretation Strategy and Plan for the archaeology and Aboriginal history of the site. The plan must be prepared by a suitably qualified and experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.</p>	<p>The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post Approval receipt it referred to by DPE as a Heritage Interpretation Plan.</p> <p>The Heritage Interpretation Strategy report states that “Interpretation is a 3-stage process, beginning with the strategy”, then recommending a Heritage Interpretation Plan be prepared. This latter proposed document was not provided for audit review.</p> <p>The Griffith Base Hospital - Interpretation Plan applies only to built heritage as applicable to condition B11.</p> <p>It is not clear if an Aboriginal Heritage Interpretation Plan has been prepared and approved for the development. This was not sighted by the auditor.</p> <p>Clarify if a Heritage Interpretation Plan is required or has been developed for Aboriginal Heritage.</p>
C9 (refer A16 also)	<p>The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p>	<p>During the second audit Numerous drums of Coating Agent - TREMPROOF 250GC R (Flammable Liquid 3) were observed stored near the on-site Flammable 3 cabinet without secondary containment within a bund in accordance with the Section 11.3.2 of the EMP (V3). Review of the Safety Data Sheet for this product also indicated it should be kept cool and not in direct sunlight, noting it was a clear and very hot day during the audit inspection. This was immediately corrected on-site once identified.</p> <p>Ensure all hazardous chemicals are stored appropriately in accordance with the EMP.</p>

4.2. Opportunities for Improvement

As previously discussed, the project should look to establish a centralised compliance register to track compliance with the conditions of approval and link to a repository of all requisite information and evidence required for audits. It is noted that most of the non-compliant findings in this first and second audit have been administrative in nature.

As previously noted by the auditor that condition B21. c) does not appear to be relevant to the hospital redevelopment.

Appendix A: Audit table

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
Part A - Administrative Controls					
<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 auditors 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 the content and/or timing of submission of reporting deliverables. Not all required documents are provided on the project website.	Non compliant
	b)	in accordance with all written directions of the Planning Secretary;	Interview - J Innes		Not triggered
	c)	generally in accordance with the EIS, Response to Submissions	Site inspection Document review	Works are being delivered genrally in accordance with the EIS and Response to Submissions	Compliant
	d)	in accordance with the approved plans in the table below:	Crown Certifictae 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:			
	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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	Not triggered
<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	The project is subject to a Crown Certificate. The Certificates includes verification of compliance with relevant building codes.	Compliant
<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	No disputes raised at the time of the first audit.	Not triggered
<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.		Refer condition B5 (a) noting Council S68 approval. No evidence of consultation with Council prior to submission of s68 application has been sighted by the auditor.	Non compliant
<u>Staging</u>					
A9.		The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	Construction Staging Report - Griffith Base Hospital Redevelopment - SSD-9838218 - Rev 3 Approval of Plan SSD-9838218-PA-3, 16/06/2022 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022	Construction - demolition works were commenced 4 May 2022. The first Staging Report Rev No. V0 is dated 26 April 2022 and as such did not meet the requirement to be submitted one month prior to the commencement of construction. The current Staging Report, Rev No. V3 has been approved by the Planning Secretary.	Non compliant
A10.		A Staging Report prepared in accordance with condition A9 must:			

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, C. Dinning	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 are in line the identified Stage 1 works. Stage 2A and Stage 2B works had not been commenced at the time of the second audit.	Compliant
A12.		Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	Griffith Hospital Stage 2 Redevelopment Contract Programme 11.02.22 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022 Interview 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:			
	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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 Cpmstruction Waste Management Sub-pan (Rev 2) confirmed recivevded by the Secretary - February 2023.	Compliant
A15.		If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.			Noted
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, C Dinning	The works at the time of the first audit were generally being delivered in accordance with the current management plans and strategies. 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.	Non compliant
Structural Adequacy					
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	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
The External Walls and Cladding					
A18.		The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Interview - J Innes	Not yet triggered at the time of the audit.	Not triggered
External Materials					
A19.		The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided:		As above	Not triggered

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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 Interview - J Innes		Compliant
A21.		Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Interview - J Innes	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:			
	a)	make the following information and documents (as they are obtained or approved) publicly available on its website:	Website https://gbhredevelopment.health.nsw.gov.au/ssda-documents		
	(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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	(iii)	all approved strategies, plans and programs required under the conditions of this consent;	As above	The Environmental Management Plan and associated sub-plans were not posted on the website at the time of the second site audit.	Non 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	No reporting of environmental performance found on website at the time of the second site audit.	Non compliant
	(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	No comprehensive summary of monitoring results on the website at the time of the second site audit.	Non 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 audit. April 2022, July 2022 and October 2022 Newsletters on website at the time of the second 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 As above	A complaints register is provided on the website. No complaints were registered at the time of the first audit. No complaints were registered at the time of the second audit. ADCO maintains its own register for complaints - how is this related to the HI complaints register.	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		Not triggered
	(x)	any other matter required by the Planning Secretary; and	As above		Not triggered
	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		Not triggered
<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 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 th conditions of approval.	Non 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		Not triggered
A26.		Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Interview - J Innes		Not triggered

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<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	Numerous non-compliant findings from first audit not yet notified at the time of the audit.	Non compliant
A28.		The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Interview - J Innes	As above	Non 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		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	The EMP and relvan sub-plans were updated following the first audit within 3 months of receiving audit findings.	Compliant
	b)	the submission of an incident report under condition A26;	Interview - J Innes		Not triggered
	c)	the submission of an Independent Audit under condition C42 or C43;	Interview - J Innes		Not triggered
	d)	the approval of any modification of the conditions of this consent; or	Interview - J Innes		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	Not triggered	Compliant
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	The EMP was updated in response to DPE comments and Version 3 has been approved.	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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
Part B - During Construction					
<u>Notification of Commencement</u>					
B1.		The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	Letter to DPE - notifying commencement of construction, Health Infrastructure, dated 20 June 20/6/2022 Demolition Permit - Building 25 - Tracks Building, ADCO Constructions, dated 4 May 2022	No audit evidence provided for first audit of notification in writing to the Planning Secretary of the planned date of commencement of construction. Health Infrastructure notified the Secretary on 20/6/2022 that construction, including demolition of Building 25 was intended to commence on 23/6/2022. The demolition of Building 25 was actually commenced on 4 May 2022 and completed prior to the stated commencement date. The Staging Report notes that construction was to commence in May 2022. As per the definition of "construction" provided in the SSD determination, construction is deemed to have commenced when the demolition work started. The notification letter was provided to the auditor on 5 January 2023 post completion of the first audit report.	Non compliant
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 during the first audit for notification of the commencement of Stage 1. As above	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	Crown Certificate 1 Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022	Structural Design Detail - ACOR Consultants Pty Ltd, 24 March 2022 submitted prior to commencement of construction.	Compliant
<u>External Walls and Cladding</u>					
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.			Not triggered
<u>Pre-Construction Dilapidation Report – Protection of Public Infrastructure</u>					
B5.		Prior to the commencement of construction, the Applicant must:			

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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	No audit evidence provided for review during the first audit. 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.	Non compliant
	b)	prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non- residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;	PRE CONSTRUCTION CONDITION SURVEY - External, AUDILAPS, (ADN22136A), 19 April 2022 PRE CONSTRUCTION CONDITION SURVEY - Council, AUDILAPS, (ADN22136B), 19 April 2022	The surveys assess infrastructure and assets in the vicinity of the Project.	Compliant
	c)	submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and	Crown Certificate 1 Crown Certificate 2	Aconex email correspondence sighted by the auditor regarding provision of dilapidation reports in compliance with SSDA Condition B5.	Compliant
	d)	prepare a report by a professional engineer detailing the proposed methods of excavation, shoring or pile construction, including details of potential vibration emissions, and demonstrating the suitability of the proposed methods of construction to overcome any potential damage to nearby premises including the residences on the south side of Magill Street and the heritage item at no.4 Hay Street, Randwick.	Crown Certificate 1 Bulk Earthworks Design, ACOR Consultants Pty Ltd, 12 April 2022 Construction Noise and Vibration Management Sub-Plan (CNVMP), E-Lab Consulting, dated 28 June 2022 Aconex mail - E-Lab consulting, 20 May 2022	E-Lab 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
<u>Pre-Construction Survey – Adjoining Properties</u>					
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

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:			<i>Not triggered</i>
	a)	provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey			<i>Not triggered</i>
	b)	submit a copy of the Pre-Construction Survey Report to the Certifier; and			<i>Not triggered</i>
	c)	provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.			<i>Not triggered</i>
<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.	Non compliant
	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, C Dinning	Stage 2 works activities	<i>Not triggered</i>
<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, C Dinning		<i>Not triggered</i>
<u>Demolition</u>					

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.	Demolition Management Plan and Methodology, 1 Noorebar Avenue. Griffith, NSW, 2680 (MOITS, undated) Statement of Safety Compliance with AS2601-2001 (Moits, undated) DPIE submission receipt - SSD-9828218-PA-8 (undated) Crown Certificate 2	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. Crown Certificate 2 confirms that the documents were submitted 13 July 2022 after the commencement of construction.	Non 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
		<i>Note:</i> - The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval - The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.			Noted
<u>Construction Environmental Management Plan</u>					

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 - C Dinning</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>	Non compliant
	a)	Details of:			
	(i)	hour of work;	As above		Compliant
	(ii)	24-hour contact details of site manager;	As above	<p>Principal Contractor Details include company office number only. The 24 hour 1800 contact number is provided on the site signage.</p> <p>The EMP V3 has been updated to include the Site Manager 24-hours contact details.</p>	Non 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	<p>Spill management is addressed, however no specific groundwater management plan included.</p> <p>Section 11.3.6 of the updated EMP (V3) addresses groundwater management.</p>	Non compliant
	(vii)	external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	As above	<p>External lighting compliance is not addressed</p> <p>Section 11.3.12 of the updated EMP (V3) addressed external lighting compliance.</p>	Non compliant

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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
	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
	b)	be prepared in consultation with Council and TfNSW;	As above	No evidence of consultation with TfNSW or Council provided for the first audit or discussed in CTMP Rev 3 CTMP Rev 6 outlines the consultation process with Council and TfNSW.	Non 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		

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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;	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.	Non compliant
	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.	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		
	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
Construction Parking					

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, etc., 21 June 2022 Site Inspection Interview - J Innes, C Dinning	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. During the second audit the onstruction workforce personal vehicles appeared to be parked generally outside of the areas designated as parking for patients or hospital staff on the hospital campus, along with those designated as high by the public.	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
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.	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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
<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.	Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021 DPIE Letter - Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2)	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:	Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP), February 2022, Version: C.2021 DPIE Letter dated 1 April 2022 - Griffith Base Hospital Redevelopment (SSD 9838218) Heritage Management Plan – Aboriginal Heritage, Condition B26 (Ref: SSD9838218-PA-2)	The AACHMP was submitted and approved by the Planning Secretary prior to the commencement of construction.	Compliant
	a)	be prepared by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary.	Letter dated 24/11/2021 - Griffith Base Hospital Redevelopment (SSD 9838218) Expert Appointment Endorsement - Condition B26(a) (ref: SSD 9838218)	Dr Jilliam Comber of Comber Consulting was endorsed by the Planning Secretary as a suitably qualified and experienced expert.	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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>					
B27.		Prior to the commencement of construction, the Applicant must submit to the Planning Secretary a Heritage Interpretation Strategy and Plan for the archaeology and Aboriginal history of the site. The plan must be prepared by a suitably qualified and experienced expert in consultation with the Heritage NSW and Registered Aboriginal Parties.	Griffith Base Hospital - Heritage Interpretation Strategy, 21 November 2021 Griffith Base Hospital - Interpretation Plan, djrd architects, 03/06/22 DPIE Letter dated 24/08/2022 - Griffith Base Hospital Redevelopment (SSD-9838218) Aboriginal Heritage Interpretation Strategy, Condition B27 Interview - J Innes, C Dinning	The Heritage Interpretation Strategy was submitted and approved prior to commencement of construction. It is noted that in the Post Approval receipt it referred to by DPE as a Heritage Interpretation Plan. The Heritage Interpretation Strategy report states that “Interpretation is a 3-stage process, beginning with the strategy”, then recommends a Heritage Interpretation Plan be prepared. This latter proposed document was not provided for audit review. The Griffith Base Hospital - Interpretation Plan applies only to built heritage as applicable to condition B11. It is not clear if an Aboriginal Heritage Interpretation Plan has been prepared and approved for the development. This plan was not sighted by the auditor during the second audit.	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.	Letter dated 7 July 2022 - SSD-9838218 – Griffith Base Hospital Redevelopment - Biodiversity Certificate 6.33 - Payment Receipt, dated 16 May 2022	Payment receipted after commencement of construction.	Non compliant
B29.		The requirement to retire like-for-like ecosystem credits and species credits in condition B28 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	As above		Compliant

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
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>					
B32.		Prior to the commencement of construction, evidence of compliance of construction parking and access arrangements with the following requirements must be submitted to the Certifier:	Crown Certificate 1 Construction Traffic Management Plan, etc., 21 June 2022		Compliant
	a)	all vehicles must enter and leave the hospital site in a forward direction;	Interview - J Innes CTMP		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:			Not triggered
	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			Not triggered
	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.			Not triggered
<u>Public Domain Works</u>					

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
Part C - During Construction					
<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	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.	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.	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 second audit the signage had been updated to include the operational hours.	Non compliant
	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		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	All plant and equipment is registered and tracked, including maintenance requirements via a digital system as observed by the auditor. All plant and equipment operating at the time of the audit appeared in good working condition.	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		Compliant

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		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		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
	b)	2pm to 5pm Monday to Friday; and	As above		Compliant
	c)	9am to 12pm, Saturday.			Not triggered
Implementation of Management Plans					
C9.		The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	EMP (V2) EMP (V3) Site Inspection	The project was being delivered in general accordance with the EMP at the time of the first audit. 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.	Non compliant
Construction Traffic					
C10.		All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping unless directed by traffic control.	CTMP Site Inspection	Addressed in the CTMP. No construction vehicles were observed outside of the site at the time of the audit.	Compliant

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
Hoarding Requirements					
C11.	a)	The following hoarding requirements must be complied with:	Site Inspection	No third-party advertising was observed by the auditor at the time of the audit.	Compliant
		no third-party advertising is permitted to be displayed on the subject hoarding/f encing; and			
		the construction site manager must be responsible for the removal of all graffiti f rom any construction hoardings or the like within the construction area within 48 hours of its application.			
No Obstruction of Public Way					
C12.		The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, ref use, skips or the like, under any circumstances.	Site inspection	No obstructing materials were observed by the auditor at the time of the audit.	Compliant
Construction Noise Limits					
C13.		The development must be constructed to achieve the construction noise management levels detailed in <i>the Interim Construction Noise Guideline</i> (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	CNVMP Site Inspection Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt Oct 2022	Noise monitoring equipment was observed at site. The auditor was advised there have been no noise exceedances up the time of the audit. 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, however no reporting had occurred at the time of the audit site inspection. The auditor has since sighted summary environmental reporting for June to September 2022. Summary environmental reporting was not yet available at the time of the second audit.	Compliant
C14.		The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4 unless allowed by condition C5.	CNVMP Interview - J Innes	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 staf f or members of the public, the use of ‘quackers’ to ensure noise impacts on surrounding noise sensitive receivers are minimised.	Interview - J Innes Site Inspection	The auditor heard the use of reversing 'quackers' while on-site.	Compliant
Vibration Criteria					
C16.		Vibration caused by construction at any residence or structure outside the site must be limited to:			

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)</i> ; and	CNVMP Griffith Hospital - Environmental Monitoring Summary Report, AsBuilt Oct 2022	Vibration monitors were observed to be in use at site. 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, however no reporting had occurred at the time of the audit site inspection. The auditor has since sighted summary environmental reporting for June to September 2022. Summary environmental reporting was not yet available at the time of the second audit.	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 meters 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:			
	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 - C. Dinning	Addressed in plan. Tree protection was observed to be in place at the time of the audit. The auditor was advised during the second audit that a protected tree outside of the Project site was damaged in a storm event and subsequently required removal. This will require a modification to the Tree Management & Protection Plan.	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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	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		<i>Not triggered</i>
<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	Wetting down of surface to minimise dust generation was being practiced at the time of the audit. No dust generation was observed during the site inspection with active earthworks.	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 Site inspection	Wetting down of surface to minimise dust generation was being practiced at the time of the audit.	Compliant
	b)	all trucks entering or leaving the site with loads have their loads covered;	Environmental and Waste Management Plan Interview - J Innes 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	Do significant amounts of track dirt onto roads was observed at the time of the audit.	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	Earthworks stage with active vehicle movement around site limiting ability for temporary or permanent stabilisation at site. Wetting down of surface to minimise dust generation was being practiced at the time of the audit.	Compliant
<u>Imported Fill</u>					
C22.		The Applicant must:			
	a)	ensure that only VENM, ENM, or other material considered suitable for beneficial reuse via a general or specific resource recovery exemption issued by NSW EPA is brought onto the site;	Site Inspection Interview - J Innes	Importation of fill material was at the time of the site inspection limited to road base material underlying the site office and amenities buildings.	Compliant
	b)	keep accurate records of the volume and type of fill to be used; and	Interview J Innes		<i>Not triggered</i>
	c)	make these records available to the Certifier upon request.	Interview J Innes		<i>Not triggered</i>
<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.	<i>Not triggered</i>
<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>					

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.	Non 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.	Not triggered
	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
C26.		Prior to commencement of construction, the Applicant must in consultation with Council, provide details and type of appropriate warning signs to be installed in accordance with Council's On-site Detention Policy (CS-CP-404) for areas subject to water ponding to the Certifier.	As above	No on-site detention proposed at the time of the audit inspection.	Not triggered
<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.	Not triggered
	b)	a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;			Not triggered
	c)	the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;			Not triggered
	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			Not triggered

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	e)	works must only recommence with the written approval of Planning Secretary.			<i>Not triggered</i>
<u>Unexpected Finds Protocol - Historic Heritage</u>					
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. Waste was observed to being segregated and stored appropriately at the time of the audit. Some waste observed on-site placed in uncontrolled manner during the second audit inspection.	Non compliant
C31.		All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	As above	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.	Compliant
C32.		The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	Interview - J Innes	No concrete waste or wash out on site.	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.	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.	Interview - J Innes Site Inspection EMP (V3)	No outdoor lighting at the time of audit.	<i>Not triggered</i>
<u>Site Contamination</u>					

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, 11/05/2022	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.			Noted
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:			
	a)	review and respond to each Independent Audit Report prepared under condition C40 of this consent, or condition C41 where notice is given;			Noted
	b)	submit the response to the Planning Secretary; and			Not triggered
	c)	make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.		Refer C43 below	Not triggered
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 first Independent Audit report, dated 30 November 2022 was provided in early December 2022 to ADCO. The delay in completing the report occurred as it took an extended timeframe to assist ADCO identify and source adequate audit evidence for review. No evidence that the Independent Audit report and response had been submitted to the Secretary was provided at the time of the second audit.	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
Part D - Prior to Commencement of Operation					
Notification of Occupation					

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>					
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>					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D9.		Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety			<i>Not triggered</i>
<u>Structural Inspection Certificate</u>					
D10.		Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after:			<i>Not triggered</i>
	a)	the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and			<i>Not triggered</i>
	b)	the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.			<i>Not triggered</i>
<u>Compliance with Food Code</u>					
D11.		Prior to the commencement of operation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that any new kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.			<i>Not triggered</i>
<u>Post-construction Dilapidation Report – Protection of Public Infrastructure</u>					
D12.		Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:			<i>Not triggered</i>
	a)	ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent;			<i>Not triggered</i>
	b)	have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads).			<i>Not triggered</i>
	c)	be submitted to the Certifier;			<i>Not triggered</i>
	d)	be forwarded to Council for information; and			<i>Not triggered</i>
	e)	be provided to the Planning Secretary when requested.			<i>Not triggered</i>
<u>Repair of Public Infrastructure</u>					
D13.		Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:			
	a)	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or			<i>Not triggered</i>
	b)	relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or			<i>Not triggered</i>
	c)	pay compensation for the damage as agreed with the owner of the public infrastructure.			<i>Not triggered</i>
		<i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.</i>			<i>Not triggered</i>
<u>Car Parking</u>					
D14.		Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant.			<i>Not triggered</i>
<u>Post-Construction Survey – Adjoining Properties</u>					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
D14.		Where a pre-construction survey has been undertaken in accordance with condition B7, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:			<i>Not triggered</i>
	a)	document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B7;			<i>Not triggered</i>
	b)	be provided to the owner of the relevant buildings surveyed;			<i>Not triggered</i>
	c)	be provided to the Certifier; and			<i>Not triggered</i>
	d)	be provided to the Planning Secretary when requested.			<i>Not triggered</i>
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>
		<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>
<u>Green Travel Plan</u>					
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>

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

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
<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>					
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 RfS.			<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 Contaminant 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>
	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>

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
	(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>
<u>Landscaping</u>					
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>					
D35.		Prior to the commencement of operation, the Applicant must undertake consultation with St Patrick's Primary School regarding an education safety campaign for students, staff and parents to raise awareness before the emergency vehicle entry is commissioned for use by NSW Ambulance. Details of the consultation and outcomes and agreed actions are to be submitted to the Certifier and the Planning Secretary for information.			<i>Not triggered</i>
Part E - Post Construction					
<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.			<i>Not triggered</i>
<u>Warm Water Systems and Cooling Systems</u>					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
E2.		The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires’ Disease			<i>Not triggered</i>
<u>Heritage Interpretation Plan</u>					
E3.		The Applicant must implement the most recent version of the Heritage Interpretation Plan under condition B27.			<i>Not triggered</i>
<u>Heritage Interpretation Strategy</u>					
E4.		The Applicant must implement the most recent version of the Heritage Interpretation Strategy and plan under condition B11.			<i>Not triggered</i>
<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.			<i>Not triggered</i>
<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 timef rame 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 ref erred 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 manuf acture, storage or display of goods, materials, ref use, 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>					
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 f rom the Applicant by a suitably qualified and experienced expert demonstrating that the project attains the minimum number of ESD points as required by condition B9 of this consent.			<i>Not triggered</i>
<u>Outdoor Lighting</u>					

Condition of Consent	Part/ Sub-Part	Condition	Evidence Collected	Comment	Audit Status
E11.		Notwithstanding condition D6, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.			<i>Not triggered</i>
<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.			<i>Not triggered</i>
<u>Hazards and Risk</u>					
E13.		The Applicant must store all chemicals, fuels and oils used on-site in accordance with:			<i>Not triggered</i>
	a)	(a) the requirements of all relevant Australian Standards; and			<i>Not triggered</i>
	b)	the EPA's Storing and <i>Handling of Liquids: Environmental Protection – Participants Manual</i> if the chemicals are liquids.			<i>Not triggered</i>
E14.		In the event of an inconsistency between the requirements of condition E13(a) and E13(b), the most stringent requirement must prevail to the extent of the inconsistency.			<i>Not triggered</i>
<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 <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> at all times.			<i>Not triggered</i>
E16		Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.			<i>Not triggered</i>
<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 B: Planning secretary audit team agreement

Department of Planning and Environment

Mr Nicholas Dowman
Senior Planning Advisor
Health Infrastructure
1 Reserve Road
ST LEONARDS NSW 2065
11/05/2022

Dear Mr Dowman

**Griffith Base Hospital Redevelopment (SSD 9838218)
Independent Auditors**

I refer to your letter dated 6 May 2022, seeking the agreement of the Planning Secretary of the Department of Planning and Environment ("the department") of the suitability of the Auditors' qualifications, experience and independence to undertake an independent audit of the Griffith Base Hospital Redevelopment ("the development"), in accordance with Schedule 2, Condition C39 of the SSD 9838218 ("the consent").

Having considered the qualifications and experience of Ms Natascha Arens and Mr Will Weir ("the audit team"), the Secretary endorses the appointment of the audit team to undertake the audit in accordance with Condition C39 of the consent. This approval is conditional on the audit team being independent of the development.

Please ensure this correspondence is appended to the Audit Report.

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

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

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

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix C: Declaration of independence

Independent Audit Report Declaration Form

Project Name: Griffith Base Hospital Redevelopment

Consent Number: SSD-9838218

Description of Project: 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.

Project Address: Animoo Avenue, Griffith NSW 2680

Proponent: Health Infrastructure

Title of Audit: Griffith Base Hospital Redevelopment Audit 2

Date: 11 January 2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Natascha Arens



Signature

Qualification: BEng (Environmental) Hons, Assoc. Dip. Eng (Mechanical), MIEA

Company: NGH Pty Ltd

Company Address: 17/21 Mary Street Surry Hills

Appendix D: Site photos



Figure 1: Completed Floor Lever Slab



Figure 2: Site signage (updated)



Figure 3: Class 3 Hazardous Chemicals

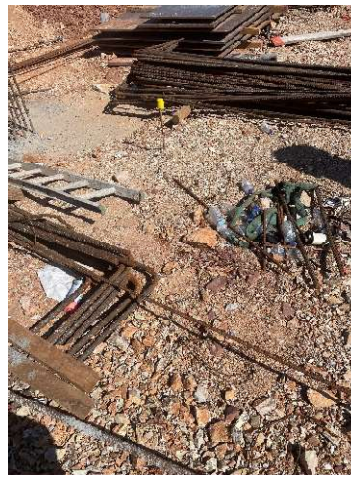


Figure 4: Example of Uncontrolled Waste



Figure 5: Hording and Sediment Controls