



Health
Infrastructure

**Proponent Response to
Independent Environmental
Audit Findings
Concord Hospital
Redevelopment**

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Introduction

Project Name and Project Application Number

Concord Hospital Redevelopment – SSD 9036

Site Address

Hospital Road, Concord West NSW 2139

Title and Revision Number

Proponent Response to Independent Environmental Audit Findings by AQUAS dated 17 October 2019 (Audit date 20 August 2019)

Date

5 November 2019

Contact Details

Proponent	Health Infrastructure (HI)
Client Representative	Johnstaff Projects Pty Ltd (JSP)
Contractor	Roberts Pizzarotti Pty Ltd (RP)

Proponent response to the Independent Audit findings

Independent Audit Date

20 August 2019

Independent Auditor

AQUAS Pty Ltd

Proponent response

The table below details the Conditions of Consent that were classified as “Non-compliant” with a recommendation by the Independent Auditor during the Independent Audit conducted on 20 August 2019. In accordance with section 4.3.2 of the Independent Audit Post Approval Requirements, the proponent has detailed the actions and the timing of such actions that are to be taken in response to each non-compliance.

Finding No.	Condition of Consent Requirement	Audit Findings	Independent Auditor Comments/ Recommended Actions	Status/ Timing
Non-Compliance-01	<p>A2. Terms Of Consent</p> <p>The development may only be carried out:</p> <ul style="list-style-type: none"> a. in compliance with the conditions of this consent; b. in accordance with all written directions of the Planning Secretary; c. generally in accordance with the EIS and Response to Submissions; d. in accordance with the approved plans below: <ul style="list-style-type: none"> - Architectural drawings prepared by Jacobs (22 listed) - Multistorey Car Park (11 listed) - Landscape Design Development Plans prepared by Site Image Landscape Architects (10 listed) - DD Concept Plan prepared by Jacobs (3 listed) - Wayfinding Signage prepared by Minale Tattersfield / Jacobs (6 listed) 	Non-compliant	<p>Based on the number of non-compliant conditions identified during this audit condition A2 is non-compliant.</p> <p>Recommendation:</p> <p>Address non-compliances identified, as suggested in this report.</p>	Complete with the closure of the non-compliances below.

<p>Non-Compliance-02</p>	<p>A19. Access to Information</p> <p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <ul style="list-style-type: none"> a. make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> i. the documents referred to in condition 0 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; 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; 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; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly; 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; x. any other matter required by the Planning Secretary; and b. keep such information up to date, to the satisfaction of the Planning Secretary. 	<p>Non-compliant</p>	<p>Not all information or documents required are uploaded in a public website.</p> <p>Recommendation:</p> <p>It is recommended that the Contractor include all the required information in the relevant website.</p>	<p>Complete</p> <p>The project website has been updated with the additional required documents.</p> <p>http://www.concordredevelopment.health.nsw.gov.au/Community/Documents</p>
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Non-Compliance-03	<p>A20. Compliance</p> <p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>	Non-compliant	<p>No evidence was available that the Contractor makes everyone aware about compliance with Conditions of Consent.</p> <p>Recommendation:</p> <p>It is recommended to include the obligation to comply with the Conditions of Consent SSD 9036 in training documentation, e.g. the site induction presentation for new staff and toolbox talks for current staff.</p>	<p>Complete</p> <p>The Roberts Pizzarotti site induction has been updated to include a reference to the SSD 9036 consent conditions.</p>
Non-Compliance-04	<p>B4. External Walls and Cladding</p> <p>Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.</p> <p>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.</p>	Non-compliant	<p>Information not yet submitted to Certifying Authority and to DPIE. This should have been submitted prior to commencement of construction.</p> <p>Recommendation:</p> <p>It is recommended that external walls and cladding information be submitted to the Certifying Authority and then to the Planning Secretary after the certifying authority accepts it.</p>	<p>A Staging Report for the redevelopment is currently being developed and will be submitted to the Department of Planning, Industry and Environment in November 2019 for approval.</p>
Non-Compliance-05	<p>B22. Ecologically Sustainable Development</p> <p>Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction the Certifying Authority demonstrating the proposal incorporates ecologically sustainable development initiatives as outlined in the statement prepared by Wood and Grieve Engineers dated 27.06.18 to target the equivalent of a minimum 4 Star Green Star rating.</p> <p>B.23</p> <p>Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction the Certifying Authority demonstrating the proposal incorporates ecologically sustainable development initiatives as outlined in the statement prepared by Wood and Grieve Engineers dated 31 October 2018 to target the equivalent of a minimum 4 Star Green Star rating.</p>	Non-compliant	<p>This information was not submitted prior construction commencement of construction. The Concord Hospital Extension Sustainable Design Performance Specification was prepared by Action Sustainability dated 16 April 2019 to address these conditions.</p> <p>Recommendation:</p> <p>Submit the required information to the Certifying Authority and ensure the requirements of this condition are met.</p>	<p>A Staging Report for the redevelopment is currently being developed and will be submitted to the Department of Planning, Industry and Environment in November 2019 for approval.</p>

<p>Non-Compliance-06</p>	<p>B25. Access for People with Disabilities</p> <p>The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifying Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.</p>	<p>Non-compliant</p>	<p>This was not completed prior to commencement construction. However, the Accessibility Design Review by McKenzie Group dated 14 September 2018 Rev E was provided as supplementary evidence. The works will be conducted under CC4 Approval.</p> <p>Recommendation:</p> <p>Provide this information so that the Certifying Authority can ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.</p>	<p>A Staging Report for the redevelopment is currently being developed and will be submitted to the Department of Planning, Industry and Environment in November 2019 for approval.</p>
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<p>Non-Compliance-07</p>	<p>B27. Construction Environmental Management Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP). The CEMP must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> a. Details of: <ul style="list-style-type: none"> i. hours of work; ii. 24-hour contact details of site manager; iii. management of dust and odour to protect the amenity of the neighbourhood; iv. stormwater control and discharge; v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; vi. groundwater management plan including measures to prevent groundwater contamination; vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting; and viii. community consultation and complaints handling; b. Construction Traffic and Pedestrian Management Sub-Plan (see condition B30); c. Construction Noise and Vibration Management Sub-Plan (see condition B31); d. Construction Waste Management Sub-Plan (see condition B32); e. Construction Soil and Water Management Sub-Plan (see condition B33): f. an unexpected finds protocol for contamination and associated communications procedure g. an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and h. waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site. 	<p>Non-compliant</p>	<p>The EMP did not address condition B27:</p> <ul style="list-style-type: none"> (a) (ii) 24-hour contact details of site manager; (a) (vi) groundwater management plan; (a) (vii) external lighting; (e) Construction Soil and Water Management Sub-Plan. <p>Recommendation:</p> <p>Amend the CEMP to address conditions (a) ii, vi, vii and (e).</p>	<p>Complete</p> <p>The Roberts Pizzarotti Environmental Management Plan has been updated to include the following:</p> <ul style="list-style-type: none"> (a) 24-hour contact details of site manager – page 13. (a) groundwater management plan – page 43 (a) external lighting – page 58. (e) Construction Soil and Water Management Sub-Plan – drawing NEWB-CV-DRG-SKC102/9.
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<p>Non-Compliance-08</p>	<p>B30. The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a. be prepared by a suitably qualified and experienced noise expert; b. describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); c. describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; d. include strategies that have been developed with the community for managing high noise generating works; e. describe the community consultation undertaken to develop the strategies in condition B21(d); and f. include a complaints management system that would be implemented for the duration of the construction. g. noise monitoring at sensitive receiver locations, including alert triggers to stop works when receivers become 'highly noise affected' (i.e. >75 dB(A) in accordance with the NSW Noise Policy for Industry (NPI)) h. compliance with the NPI construction noise management levels (R8L+10 dB(A) where feasible and reasonable i. respite periods j. all construction activities to comply with best practice vibration management criteria k. construction vehicles to arrive at the site inside of approved construction hours l. a risk safety assessment is required to determine if audible movement alarms are required. 	<p>Non-compliant</p>	<p>The CNVMP did not address condition B30: (e) describe community consultation undertaken; (i) respite periods; (l) a risk safety assessment for need of movement alarms. Recommendation: Amend the CNVMP to address conditions (e), (i) and (l).</p>	<p>Complete The Roberts Pizzarotti CNVMP has been updated to include the following: (e) describe community consultation undertaken – page 25. (i) respite periods – page 21. (l) a risk safety assessment for need of movement alarms – page 21.</p>
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<p>Non-Compliance-09</p>	<p>B32. The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> a. be prepared by a suitably qualified expert, in consultation with Council; b. describe all erosion and sediment controls to be implemented during construction; c. provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); d. detail all off-Site flows from the Site; and e. describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI). 	<p>Non-compliant</p>	<p>The CSWMSP did not address condition B32:</p> <ul style="list-style-type: none"> (a) No evidence of consultation with Council (e) No evidence that the current erosion and sedimentation control measures are designed to cover large rain events (e.g. 1 in 5-year ARI and 1 in 100-year ARI). <p>Recommendation: Conduct consultation with the Council about the CSWMSP and amend the CSWMSP to address condition (e).</p>	<p>The Roberts Pizzarotti CSWMSP has been updated to include the following:</p> <ul style="list-style-type: none"> (a) No evidence of consultation with Council – page 6. (e) No evidence that the current erosion and sedimentation control measures are designed to cover large rain events (e.g. 1 in 5-year ARI and 1 in 100-year ARI) – page 6.
<p>Non-Compliance-10</p>	<p>B33. Stormwater Management System Prior to the commencement of construction, the Applicant must design a stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must:</p> <ul style="list-style-type: none"> a. be designed by a suitably qualified and experienced person(s); b. be generally in accordance with the conceptual design in the EIS; c. be in accordance with applicable Australian Standards; and d. 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. e. divert existing clean surface water around operational areas of the site; f. direct all sediment laden water in overland flow away from the leachate management system; g. prevent cross-contamination of clean and sediment or leachate laden water; h. include a hydrocarbons trap or separator to treat run-off and remove suspended solids and their associated pollutants including oil prior to being discharged. i. Council shall be consulted prior to the installation of any MSCP stormwater system that impacts on the Council nature reserve to the north of the existing main car park. 	<p>Non-compliant</p>	<p>Design of a stormwater management system for the development, part of CC2 Approval was not submitted to Certifying Authority prior to commencement of construction.</p> <p>Recommendation: This has now been addressed as per evidence presented, e.g.: Design certificates CC2 approval - 19 August 2019 City of Canada Bay- Building Certification for Crown Building Work Certificate No.19/124467-4. Design Certificates for Plumbing and Drawings sighted. Civil Design Certificate from TTW included Plumbing and Drainage Stormwater Drainage - 25 June 2019.</p>	<p>Complete</p>

Non-Compliance-11	<p>B34. Operational Noise - Design of Mechanical Plant and Equipment</p> <p>Prior to commencement of construction, the Applicant must provide noise mitigation measures into the detailed design drawings. The Certifying Authority must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the report titled Concord Repatriation General Hospital Redevelopment Acoustic Report, prepared by Acoustic Logic dated 10 July 2018.</p>	Non-compliant	<p>This was not completed prior to commencement of construction.</p> <p>Recommendation:</p> <p>Provide noise mitigation measures and ensure requirements of this condition are met.</p>	<p>A Staging Report for the redevelopment is currently being developed and will be submitted to the Department of Planning, Industry and Environment in November 2019 for approval.</p>
Non-Compliance-12	<p>B45. Bicycle Parking and End-of-Trip Facilities</p> <p>Compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ol style="list-style-type: none"> the provision of a minimum 40 staff and visitor bicycle parking spaces; the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities.- Bicycle parking, and be located in easy to access. well-lit areas that incorporate passive surveillance; appropriate pedestrian and cyclist advisory signs are to be provided; and all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. 	Non-compliant	<p>Requirements for bicycle parking and end-of-trip facilities not submitted to the Certifying Authority prior commencement of construction.</p> <p>Recommendation:</p> <p>Submit the requirements for bicycle and end-of-trip facilities to the Certifying Authority and ensure requirements of this condition are met.</p>	<p>A Staging Report for the redevelopment is currently being developed and will be submitted to the Department of Planning, Industry and Environment in November 2019 for approval.</p>
Non-Compliance-13	<p>C37. Revision of Strategies, Plans and Programs</p> <p>Within three months of:</p> <ol style="list-style-type: none"> the submission of a compliance report under condition B48; the submission of an incident report under condition C35; the submission of an Independent Audit under condition C39; the issue of a direction of the Planning Secretary under condition 0 which requires a review, <p>the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.</p>	Non-compliant	<p>Evidence was not available that the Plans were reviewed within three months of submission of the Compliance Report (due by 17/07/19) and notification sent to DPIE and the Certifying Authority.</p> <p>Recommendation:</p> <p>Conduct a review of the Plans and notify the Department and the Certifying Authority, as required by this condition.</p>	<p>Complete</p> <p>The Compliance Report for the project will be issued to the Department of Planning, Industry and Environment in November 2019.</p>

<p>Opportunity for Improvement-01</p>	<p>B47. Compliance Reporting No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority. Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.</p>	<p>Non-compliant</p>	<p>NSW170_14.5_190417 Compliance Monitoring and Reporting Program. Pre-construction Compliance Report due April 2019 was sent to DPIE on 17 April 2019 from HI. Email was presented as evidence for compliance to this condition. Recommendation: RP to populate the Construction Compliance Register to ensure that the project is compliant to each of the conditions of approval and be ready for the submission of the Construction Compliance Report.</p>	<p>Complete The Compliance Report for the project will be issued to the Department of Planning, Industry and Environment in November 2019.</p>
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