



**Health**  
Infrastructure

# **Proponent Response to Independent Audit Findings Bowral & District Hospital Redevelopment Project**

**State Significant Development (SSD) 8980**

**CLIENT REPRESENTATIVE - CAPITAL INSIGHT**

[VERSION 1.0]  
23 October 2019

## Contents

Introduction.....	3
Project Name and Project Application Number.....	3
Site Address .....	3
Title and Revision Number .....	3
Date .....	3
Contact Details .....	3
Independent Audit Date.....	3
Independent Auditor .....	3
Proponent Response.....	3

## Introduction

### Project Name and Project Application Number

Bowral and District Hospital – SSD 8980

### Site Address

97 – 103 Bowral Street, Bowral (Lot 4 DP 858938)

### Title and Revision Number

Proponent Response to Independent Audit Findings Version 1

### Date

27 August 2019

### Contact Details

<b>Proponent</b>	Health Infrastructure
<b>Client Representative</b>	Capital Insight
<b>Managing Contractor</b>	ADCO Construction

### Independent Audit Date

11-12 September 2019

### Independent Auditor

NGH Environmental

## 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 11-12 September 2019. As required the proponent has provided a detailed action plan to be undertaken in response to each non-compliance, refer table 1 on the next page.

The below table also includes responses for Conditions of Consent that were classified as “Compliant”, however were identified during the audit as opportunities for improvement.

Condition No.	Requirement	Audit Findings	Independent Auditor Comments / Recommended Actions	Comments / Actions / Response	Timing
A19	<p><b>Access to Information</b></p> <p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>(i) the documents referred to in condition A2 of this consent;</p> <p>(ii) all current statutory approvals for the development;</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>(vi) a summary of the current stage and progress of the development;</p> <p>(vii) contact details to enquire about the development or to make a complaint;</p> <p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the</p>	Non-compliant	<p>There was no regular environmental reporting or summaries of monitoring results on the website as required by A19 iv) and v).</p> <p>Information regarding environmental performance and monitoring should be made available on the project website.</p>	<p>Monthly environmental performance and monitoring will be published on the project website moving forward.</p> <p>The documents required by Condition A19 will be separated out to assist with access to information for the public.</p>	31 October 2019

**PROPONENT RESPONSE TO INDEPENDENT AUDIT FINDINGS BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT PROJECT**

	<p>Applicant's response to the recommendations in any audit report;</p> <p>(x) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>				
B14	<p><b>Construction Environmental Management Plan</b></p> <p>Prior to commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP) and it must include, but not be limited to, the following:</p> <p>(a) Details of:</p> <p>(i) hours of work;</p> <p>(ii) 24-hour contact details of site manager;</p> <p>(iii) management of dust and odour to protect the amenity of the neighbourhood;</p> <p>(iv) stormwater control and discharge;</p> <p>(v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</p> <p>(vi) groundwater management plan including measures to prevent groundwater contamination;</p> <p>(vii) external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</p> <p>(viii) community consultation and complaints handling;</p>	Non-compliant	A ground water management plan should be referenced in the CEMP or HI should request a modification to the consent condition.	The ground water management plan will be referenced and included within the CEMP.	31 October 2019
B14	<p><b>Construction Environmental Management Plan</b></p> <p>(f) an unexpected finds protocol for contamination and associated communications procedure;</p>	Compliant	This procedure does not cover "other" unexpected contamination It is noted that contaminated material is also covered in the Waste Management plan. An	Handling of "Other" Unexpected contamination will be added from the Waste Management Plan into the Unexpected Finds Procedure.	31 October 2019

**PROPONENT RESPONSE TO INDEPENDENT AUDIT FINDINGS BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT PROJECT**

			opportunity for improvement would be to also include handling of other unexpected contamination finds in the unexpected finds procedure.		
B17	<p>The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</p> <p>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</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 B16(d); and</p> <p>(f) include a complaints management system that would be implemented for the duration of the construction.</p>	Non-compliant	The plan should describe how the strategies to manage noise have been developed with its most affected stakeholder (The LHD) and append any consultation.	<p>It is noted that the project has regular interface meetings with regards to planning of the works and any impacts to the surrounding stakeholders, public, etc. This includes advance notification of disruptions due to the project works via formal 'Disruption Notices'.</p> <p>These notices are coordinated with the hospital/LHD prior to any works taking place to ensure that any potentially affected stakeholders can be consulted and notified ahead of the works. This includes on campus staff along with surrounding neighbours and businesses.</p> <p>Disruption notices include traffic and noise impacts, with approval to proceed with the required works only being granted once the relevant stakeholders have been consulted, advised or notified as applicable.</p>	31 October 2019

**PROPONENT RESPONSE TO INDEPENDENT AUDIT FINDINGS BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT PROJECT**

				<p>It is noted that ADCO notified the surrounding residences and businesses (approximately 270 residences and 15 businesses) prior to commencing works, advising of the commencement of construction along with prior notice with regards to noise and dust.</p> <p>It is believed the project has implemented well thought-out strategies to manage noise and disruption, and these have been incorporated within the Construction Noise and Vibration Management Sub-Plan to reflect this. Furthermore, Bowral &amp; District Hospital was consulted in the development of ADCO's Noise and Vibration Management Plan. The hospital will continue to be informed of any work that may present an impact with regards to noise and vibration.</p>	
B18	<p>The Construction Waste Management Sub-Plan (CWMS) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</li> <li>(b) 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 in accordance with the requirements of the relevant</li> </ul>	Compliant	<p>The Construction Waste Management Sub Plan details percentages of materials to be recycled / reused or sent to landfill. The Bulk earthworks plan details the quantity of excavated material generated by the project.</p> <p>As an opportunity for improvement there could be a</p>	<p>The Bulk Earthworks Plan will be attached to the Construction Waste Management Sub-Plan.</p>	31 October 2019

**PROPONENT RESPONSE TO INDEPENDENT AUDIT FINDINGS BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT PROJECT**

	legislation, codes, standards and guidelines, prior to the commencement of any building works.		link to the bulk earthworks plan in the CWMSP to make it clear that there will be no large volumes of material required to be carted from the site.		
B27	<p><b>Compliance Reporting</b></p> <p>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).</p> <p>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>	Non-compliant	The Pre construction compliance report should be made publicly available.	The Pre construction compliance report is now publicly available on the HI project website.	Closed
C11	<p><b>Parking signs</b></p> <p>'No parking' signs are to be installed to protect sight lines of the new driveway to Bowral Street. This is to be to the satisfaction of Council's Traffic Committee and be delivered at full cost to the Applicant prior to the commencement of works.</p>	Compliant	C11 requires No parking signage on Bowral Street to be installed to the satisfaction of Council. The audit found documented evidence that Council gave approval for the signage installation with a number of conditions. The signage has now been installed and interviews with staff indicate that it was installed to the satisfaction of Council, however no documented evidence was able to be produced at the time of the audit that the requests from council were completed. As an opportunity for improvement it is suggested that evidence that	Confirmation regarding the signage on Bowral St will be obtained in writing from Council.	30 November 2019



**PROPONENT RESPONSE TO INDEPENDENT AUDIT FINDINGS BOWRAL & DISTRICT HOSPITAL REDEVELOPMENT PROJECT**

			the signage was installed to Councils satisfaction is requested from Council.		
C42	<p><b>Independent Environmental Audit</b></p> <p>No later than two months after the date notified for commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.</p>	Non-compliant	As the audit program has been provided to the Department there is no further action regarding this non compliance.	N/A	Closed
C43	<p>Independent Audits of the development must be carried out in accordance with:</p> <p>(a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 of this consent</p>	Non-compliant	The second audit of the project should be scheduled in advance of the due date.	Second audit has been scheduled within 52 weeks of the completion of Audit 1 as per the DPE requirements.	Closed

