

Nepean Hospital Redevelopment Independent Environmental Audit



Assessment of CPB Contractors Environmental System Compliance Against the SSD 8766 Conditions of Consent

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This report has been prepared and reviewed in accordance with our Quality control system.

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Date: 17/12/2019

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1. Executive Summary

This audit was completed to assess the compliance of Nepean Hospital Redevelopment Project with the requirements of Development Consent State Significant Development (SSD) 8766 Condition C43. The audit was conducted by AQUAS (Annabelle Tungol – Lead Auditor and Ana Maria Munoz – Auditor) on 26 November 2019.

Overall, the project environmental performance in relation to the Development Consent SSD 8766 is satisfactorily met with the following key strengths noted:

- Weekly environmental inspections continue to be carried out;
- Internal and external communication with the Hospital and stakeholders continue to be undertaken;
- Consultations with the Hospital and sensitive receivers have been managed well;
- No formal complaints have been received.
- Non-conformances raised in the previous independent environmental audit have been recorded, communicated and corrective actions implemented;
- Environmental controls on site have been implemented, including:
 - erosion and sedimentation i.e. drains/pits covered;
 - noise barriers were installed around sensitive receivers;
 - dust, vibration and asbestos monitoring devices were implemented around the site and reports have been received periodically;
 - trucks leaving site were covered, water cart in used;
 - traffic controllers in place and traffic plan well implemented;
 - rumble grids were installed at the site exit; and
 - wastes segregation in place.

It was noted that 4 modifications have been sought to the Department of Planning, Industry and Environment (DPIE). Modification 1 (25/6/19), Modification 2 (10/10/19) and Modification 3 (14/08/19) have been approved and the SSD Conditions of Consent 8766 were modified to reflect those changes.

Modification 4, a Staging Report, was prepared in collaboration between CPB, CBRE and Health Infrastructure (HI) to allow for a staged approach during the project lifetime. This report will address the conditions required to be met prior the commencement of construction. The report was submitted to DPIE on the 25/11/19 (Revision 10b) and was approved on 2/12/19. Consequently, the non-compliances raised in the previous audit regarding the 'prior to commencement of construction' conditions have been closed.

Summary of Audit Findings

Based on the conducted independent environmental audit which comprised of document and records review, interview with key personnel and site inspection there were a total 102 Conditions of Consent that have been reviewed during this audit.

The following are the audit findings raised that need to be addressed by CPB, CBRE and HI to attain full compliance with SSD 8766 and continually improve the environmental performance of the development.

Non-Compliances

- **NC-01** Condition A2 (a): Based on the audit identifying one non-compliance for the project, condition A2 (a) is assessed as non-compliant.
- **NC-02** Condition C9: The CEMP and sub-plans were generally compliant with the requirements of the Development Consent SSD 8766 and were reviewed and maintained, however during this audit the implementation of some of the process and procedures were not evident, including the following:
 - No evidence provided for management review meetings;
 - No audit schedule provided; and
 - Environmental performance trend to be included in the Monthly Report.

The above lack of evidence constitutes non-compliant to the implementation of Construction Environmental Management Plan (CEMP) as per Condition C9.

In addition to the non-compliant raised, the auditor identified two opportunities for improvement for the continual improvement of the environmental performance of the project.

Opportunities for Improvement

- **OFI-01** Condition A11 (c): An update of the Staging Report revision 10b dated 25/11/19, is recommended to ensure that the following conditions are included at each relevant stage and will be implemented accordingly.
 - o B18: Access for People with Disabilities
 - o B37: Car Parking and Service Vehicle Layout
 - o B38: Bicycle Parking and End-of-trip Facilities
- **OFI-02** Condition C51: It was noted that the Construction Traffic Pedestrian Management Sub-Plan (CTPMSP) Revision 14 has not been reviewed since 10/04/19 and no changes were noted in the plan. It is recommended to indicate in the CEMP document approval table (front page) the revision of any subplans, even if no changes are made in those subplans. Also, the revision number of the CEMP needs to be consistent in all pages.

2. Introduction

2.1 Background

CPB has been appointed by CBRE for the construction of a new 14 storey clinical and ambulatory services building as part of the Nepean Hospital Redevelopment Project.

CBRE has engaged AQUAS to undertake the second independent environmental audit on 26 of November 2019 during construction phase of the Nepean Hospital Redevelopment project in compliance with the following Development Consent Conditions:

Condition C43

Independent Audits of the development must be carried out in accordance with:

- (a) the Independent Audit Program submitted to the Department and the Certifier under condition C39 of this consent; and
- (b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).

2.2 Project Details

Project Name	Nepean Hospital Redevelopment
Project Application Number	SSD 8766
Project Address	35-65 Derby Street, Kingswood NSW
Project Phase	Construction
Project Activity Summary	Current site works included in-ground services, formwork, excavation, scaffolding, concrete pouring and starting the construction of the first level.

2.3 Audit Team

Details of the AQUAS environmental auditors for this audit were submitted to the Department of Planning by CBRE. Endorsement by Planning of the following auditors was granted prior to the conduct of the audit Refer to **Appendix A**:

Name	Company	Position	Certification
Annabelle Tungol	AQUAS	Lead Environmental Auditor	Exemplar Global Principal Environmental Auditor – Certificate No. 119536
Ana Maria Munoz	AQUAS	Environmental Auditor	SAI Global Lead Auditor; Exemplar Global Certification Environmental Auditor Certificate No. 115421

2.4 Audit Objectives

The objective of this audit was to undertake the second independent environmental audit in compliance with the Development Consent Condition SSD 8766 Cl. C43, in accordance with:

- (c) the Independent Audit Program submitted to the Department and the Certifier under condition C39 of this consent; and
- (d) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).

2.5 . Audit Scope

The scope of this audit comprised of the following:

- Review of implementation of CPB Environmental Management Plan (EMP) Revision 2 dated 20 October 2019 and the following appendices:
 - Appendix 6 – Construction Traffic and Pedestrian Management Sub-Plan
 - Appendix 7 – Construction Noise and Vibration Management Sub-Plan
 - Appendix 8 – Construction Waste Management Sub-Plan
 - Appendix 9 – Construction Soil and Water Management Sub-Plan
 - Appendix 10 – Flood Emergency Response Plan
 - Section 15 – Air Quality Sub-Plan
 - Section 16 – Groundwater Sub-Plan
- Site inspection conducted on 26 November 2019;
- Review of environmental records;
- Interview of site personnel; and
- Consultation with stakeholders.

2.6 Audit Period

This was the second independent environmental audit carried out by AQUAS on the project which covers the review of environmental documentation and records for the construction works covering construction works between June 2019 to 26 November 2019 only.

It should be noted that this report is based on the result of sampling and supplied documentation/records, as well as site activities on the day of audit (26 November 2019).

3. Audit Methodology

3.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is attached as **Appendix A**.

3.2 Audit scope development

AQUAS developed the audit scope and a checklist based on the Project Development Consent Requirements Application No. SSD 8766. Refer to **Appendix D** of this report.

3.3 Audit Process

3.3.1 Opening Meeting

An opening meeting was held on 26 November 2019 at 8:30am with CPB, CBRE, HI project personnel and AQUAS auditors as per the Audit Attendance Sheet. Refer to **Appendix B** of this report.

Key items were discussed, including:

- Confirmation of the purpose and scope of the audit;
- Overview of the Project and status of the works;
- Occurrence of any environmental incidents; and
- Overview of the audit process in accordance with the proposed Audit Program.

3.3.2 Conduct of Audit

Audit activities included the following:

- Reviewed the project documentation (CEMP and its sub-plans) to verify compliance with the Development Consent Conditions SSD 8766;
- Conducted a site walk to review implementation of mitigation measures and environmental controls;
- Conducted the audit following the checklist that was prepared based on the Development Consent Conditions by interviewing personnel and review of records provided as evidence of compliance; and
- Any identified findings were discussed during closing meeting and any actions noted during site inspection were clearly communicated to the site personnel and addressed immediately.

3.3.3 Closing Meeting

The closing meeting was held on 26 November 2019 at 4:00pm with representatives of HI, CBRE, CPB and AQUAS. General feedback and the findings of the audit were discussed during the closing meeting.

AQUAS auditors acknowledged the cooperation, openness and hospitality of CPB staff during the conduct of this audit.

3.4 Interviewed Persons

Name and position of persons interviewed:

Name	Organisation	Position
Mark Mittiga	CPB	Area Manager
Max Elmes	CPB	Project Engineer
Pat Newcombe	CPB	SHE Manager

3.5 Details of Site Inspection

A site walk around the construction area was conducted with focus on the following controls:

- Erosion and sedimentation controls including sediment fences and controls around pits.
- Traffic management and surroundings dust/mud tracking;
- Stabilised access/egress;
- Dust, noise, vibration and waste management;
- Site fence/screening;
- Chemical storage;
- Site signage; and
- General housekeeping.

Photos taken during site inspection are included in the **Appendix E**.

3.6 Consultation

Consultation with the Department of Planning, Industry and Environment (DPIE) was conducted before the audit. DPIE requested to assess all conditions of consent for SSD 8766 including any approved modifications which were applicable at the time of the audit. It was also requested that the audit was conducted in accordance with the requirements of condition C43 of SSD 8766.

Communications were sent to Project Representatives from Health Infrastructure to request feedback about the project and highlight any areas for review by AQUAS during the audit. HI indicated that the traffic, noise and communication controls have been working appropriately. Comments were made on the dust and vibration concerns from the Childcare and Drug & Alcohol team. Follow-up actions and relevant resolution was discussed. It was indicated to check the stormwater management and current controls for overflow and construction waste. Refer to **Appendix F** for consultation records.

3.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

In addition to the above descriptors, there were opportunities of improvement (OFI) raised during this audit.

4. Document Review

The following documents were reviewed and/or sighted as part of this audit:

- Construction Environmental Management Plan (CEMP) Rev. 3 – 20/10/19
- Construction Traffic Pedestrian Management Sub-Plan (CTPMSP) Issue 14 – 10/4/19
- Construction Noise and Vibration Management Sub-Plan Rev. 2 – 15/8/19
- Construction Waste Management Plan Rev. 2 – 30/7/19
- Construction Soil and Water Management Sub-Plan Rev. C – 1/8/19
- Early Work Soil and Water Management Plan Issue C - 0000050 – 25/3/19.
- Flood Emergency Response Plan Rev. D – 15/8/19
- Remedial Action Plan Rev. 1 – 16/4/19
- Nepean Hospital Redevelopment Detail Master Program 23/10/19
- Pre-construction Compliance Report – 2/10/19
- Staging Report – Nepean Hospital Redevelopment Stage 1 Revision 10b – 25/11/19
- NSW Government Long Service Corporation Levy Receipt No. 00376269 – 8/4/19, Second Receipt No. 00393270 - 20/8/19 and Third Receipt No. 00394907 - 2/9/19.
- BCA Crown Certificate No. CRO-18145 (Stage 2) – 3/9/19
- BCA Crown Certificate No. CRO-18117 (Stage 2) – 2/5/19
- Certificate of Design – Civil, Stage 1 from Bonacci – 18/4/19
- Environmental Inspection reports for 9/10/19, 17/10/19, 7/11/19 and 14/11/19
- Asbestos monitoring report from JBS&G – 24/10/19
- Dust monitoring results from JBS&G – 31/10/19
- Aviation Report Nepean Hospital Redevelopment from AviPro Rev.1.7 – 4/11/19 Design Report 80%
- Dust Monitoring Report (PM₁₀) by JBS&G – 31/10/19
- Plant Risk Assessment for excavator large (20 tonne) – 8/2/19
- Tower Crane Operator License – 1/1/22 No. HRW7574
- Scaffold Tag No. 5615-5616 – 26/11/19
- Verification of Competency for excavator 29/7/19 – 29/7/20
- SDS for Diesel Fuel – 25/6/16, Unleaded 91 – 1/9/16 and Premium Unleaded 95 – 16/9/16
- Vibration Monitoring Reports from Acoustic Logic, 4-11/11/19 and 11-18/11/19
- Dust Monitoring results - DMR051 conducted 12/11/19 and Main works (PM10) - 19/11/19
- Airborne Asbestos Fibre Monitoring Report from JBS&G - 21/11/19
- Waste Delivery Docket No. 20085540-NSTM from GSW recyclable – 3/8/19
- Clean Concrete Delivery Docket No. 100000165-NSTM – 6/9/19.
- Reflectivity Report Nepean Hospital NSW Infrastructure dated 19 November 2019 Reference 18034 Revision 01
- Stage 2 Crown Certificate - Inground Works & Above Ground Structure- Tower Building 1 Crown Certificate # CRO-18145 – 3/9/19.

5. Audit Findings

This audit was completed to assess the implementation of CEMP and environmental controls established by HI, CBRE and CPB against the requirements of Development Consent SSD 8766.

The following table summarises the audit findings by compliance status descriptors:

Compliance Status Descriptors	Number of Findings
Compliant	54
Non-Compliant	2
Not Triggered	46
Total Requirements	102

5.1 Assessment of Compliance

The audit determined that CPB has generally implemented the controls for environmental management within the construction activities that are currently being undertaken. The comparison of audit requirements against the compliance ratings is as follows:

SSD Requirements	Requirements	Findings
Part A – Administrative Controls	17	Complaint – 8
		Non-Compliant – 1
		Not Triggered – 8
Part B – Prior to commencement of Construction	28	Complaint – 9
		Non-Compliant – 0
		Not Triggered – 19
Part C – During Construction Appendix 1 – Incident Notification	57	Complaint – 37
		Non-Compliant – 1
		Not Triggered – 19

5.2 Notices, Incidents and Complaints

CPB noted that no agency notices, orders, penalty notices or prosecutions have been issued, and no reportable environmental incidents have occurred to date.

No formal complaints have been received for Stage 1 of the project. A Complaints Register is available where information about the complaints is recorded including the relevant resolution; register has been uploaded in the website.

5.3 Previous Audit (June 2019) Recommendations

The audit noted that Modification 4, Staging Report, was prepared in collaboration between CPB, CBRE and Health Infrastructure (HI) to allow for a staged approach during the project lifetime. This report addresses the conditions required to be met prior the commencement of construction. The report was submitted to DPIE on the 25/11/19 (Revision 10b) and was approved on 2/12/19. Consequently, the non-compliances raised in the previous audit regarding the 'prior to commencement of construction' conditions have been closed.

All audit findings were reviewed in detail with CPB. AQUAS confirmed that CPB responses and actions were appropriate to close out all the Non-Compliances and all the Opportunities for Improvement raised during the audit conducted on the 13 June 2019, as detailed below.

Finding No.	SSD Condition	Audit Finding	Follow-up Comments	Status
Non-Compliance 01	A2: Terms of Consent	Based on the number of non-compliant items the project is non-compliant to the requirement of: A2. The development may only be carried out: (a) in compliance with the conditions of this consent;	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -02	A20: Access to Information	The following items were not posted on the website as per the requirements of A20: – The CEMP and subplans; – performance report; – monitoring reports for dust and vibration; and – Complaints register	Documents are currently available on the DPIE project website. New reports will be uploaded as received. https://www.hinfra.health.nsw.gov.au/our-projects/project-search/hepean-redevelopment-stages-1-2	Closed 26/11/19
Non-Compliance -03	B5: External Walls and Cladding	Documented evidence of the products and systems use for the construction of external walls and cladding was not provided to the Certifying Authority prior to commencement of construction. It was noted that design of external walls and cladding is ongoing and has not been finalised. No report or statement was available at the time of the audit. Certificate from Certifying Authority not yet available.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -04	B6: External Walls and Cladding	Copy of the design documentation given to the Certifying Authority for external walls and cladding was not provided to DPIE within seven days after the Certifying Authority accepts it.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19

Finding No.	SSD Condition	Audit Finding	Follow-up Comments	Status
Non-Compliance -05	B17: Outdoor Lighting	Outdoor lighting documentation was not provided to the satisfaction of the Certifying Authority prior to commencement of construction. The outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Lighting must comply with any recommendations of the review undertaken under condition B44 to ensure the ongoing safe operations of the existing helipad on the site.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -06	B18: Access for People with Disabilities	Design and construction of the facilities/access to people with disability in accordance with BCA requirements was not provided to the Certifying Authority prior to 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.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -07	B30: Operational Noise - Design of Mechanical Plant and Equipment	The noise mitigation measures for the operational plant and equipment in the detailed design drawings were not provided to DPIE prior to commencement of construction to ensure the development will not exceed the recommended operational noise levels identified in the Acoustic Assessment (Rev.9 – 15/11/18).	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -08	B33: Operational Waste Storage and Processing	Agreement from the Council for the design of the operational waste storage area where waste removal is undertaken by Council was not provided prior to the commencement of construction.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -09	B34: Mechanical Ventilation	Details of the mechanical ventilation systems designed in accordance with Part F4.5 of the BCA and in compliance with the AS 1668.2-2012 and the use of air-conditioning in buildings – Mechanical ventilation in buildings and AS/NZS 3666.1:2011	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications.	Closed 26/11/19

Finding No.	SSD Condition	Audit Finding	Follow-up Comments	Status
		Air handling and water systems of buildings – Microbial control were not provided to the Certifying Authority prior to the commencement of construction.	Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	
Non-Compliance -10	B35: Rainwater Harvesting	Details of the rainwater reuse/harvesting system for the development and rainwater re-use plan prepared and certified by an experienced hydraulic engineer were not provided prior to the commencement of construction.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -11	B37: Car Parking and Service Vehicle Layout	The minimum of 59 on-site car parking spaces for use during operation of the development and designed in accordance with latest version of AS2890.1 was not submitted to the satisfaction of the Certifying Authority prior commencement of construction.	In accordance with the Assessment Report for SSD 8766, the parking demand for the development (59 spaces) is to be accommodated by the new multi-deck car park that was opened on the 16 th of June 2019.	Closed 26/11/19
Non-Compliance -12	B38: Bicycle Parking and End-of-trip Facilities	Details of the design of the secure bicycle parking and end-of-trip facilities were not provided to the satisfaction of the Certifying Authority prior to the commencement of construction.	This was addressed through request for a formal SSD modification (MOD 4) including linking the construction works activities to an appropriate formal Staging Report which captures required consent condition approvals and certifications. Staging Report was submitted to DPIE on the 25/11/19 (Rev 10b) and approved on 2/12/19.	Closed 26/11/19
Non-Compliance -13	C2: Site Notice	Site notice displayed at the boundaries of the site did not include the name of Builder, Certifying Authority and Structural Engineer as well as the approved hours of work and address. Only the name of the contractor and contact details were included.	Upgraded notices with all the required information were installed at the main entrance of the construction site. Refer to Appendix E for the site notice photo.	Closed 26/11/19

5.4 Audit Site Inspection

The site inspection was conducted at 9:00am on 26 November 2019. AQUAS auditors and CPB project representatives walked through the construction site, where environmental controls were observed, including:

- Erosion and sediment controls for pits/drains outside and inside the site;
- Site signage and site sheds;
- Suitable storage for hazardous materials;
- Traffic signage well implemented;
- Noise, vibration and asbestos monitoring equipment in place at various locations;
- Scaffold appropriately tagged;
- Skip bins for waste and recycling in various locations; and
- Housekeeping.

All issues noted during the site inspection have been addressed immediately during the day of audit prior to rain i.e. controls around pit and cleaned up of accumulated sediments along the gutter. Please refer to photos of the site inspection in **Appendix E**.

5.5 Suitability of Plans and the EMS

The CEMP and sub-plans were generally compliant with the requirements of the Development Consent SSD 8766 and were reviewed and maintained, however during this audit the implementation of some of the process and procedures were not evident, including the following:

- No evidence provided for management review meetings;
- No audit schedule provided; and
- Environmental performance trend to be included in Monthly Report.

The above lack of evidence constitutes non-compliant to the implementation of Construction Environmental Management Plan (CEMP) as per Condition C9.

5.6 Development Past Performance

The audit indicated that CPB project's performance has improved significantly. This can be determined due to the following aspects:

- no incidents, complaints or disputes have been raised;
- noise, vibration and asbestos monitoring reports have been conducted as per the monitoring program;
- all the Development Consent Conditions SSD 8766 have been tracked and monitored;
- the Compliance Reports have been prepared, as required;
- the Staging Report was prepared as part of Modification 4, which was approved on 2/12/19 aligning the project conditions with the Certifying Authority approvals based on the Crown Certificates timelines.

5.7 Actual and Predicted Impacts

There are no significant change or additional impacts noted on the actual construction works based on the monitoring results. The predicted impacts as stated in the Environmental Impact Assessment (EIA) remain the same.

5.8 Key Strengths

Overall, the project environmental performance in compliance with Development Consent SSD 8766 is satisfactorily met with the following key strengths noted:

- Weekly environmental inspections continue to be carried out;
- Internal and external communication with the Hospital and stakeholders continue to be undertaken;
- Consultations with the Hospital and sensitive receivers have been managed well;
- No formal complaints have been received.
- Non-conformances raised in the previous independent environmental audit have been recorded, communicated and corrective actions implemented;
- Environmental controls on site have been implemented, including:
 - erosion and sedimentation i.e. drains/pits covered;
 - noise barriers were installed around sensitive receivers;
 - dust, vibration and asbestos monitoring devices were implemented around the site and reports have been received periodically;
 - trucks leaving site were covered, water cart in used;

- traffic controllers in place and traffic plan well implemented;
- rumble grids were installed at the site exit; and
- wastes segregation in place.

6. Recommendations

The following table outlines the identified non-compliances that need to be addressed and the auditor's recommendations. Refer to the attached **Appendix D** for full details of findings including auditor notes.


Finding Number	Consent Condition Description	Audit Findings	Recommendations
Non-Compliance 01	<u>A2: Terms of Consent</u> The development may only be carried out: (a) in compliance with the conditions of this consent;	Based on the audit identifying one non-compliance for the project, condition A2 (a) is assessed as non-compliant.	Address the non-compliance identified in this report.
Non-Compliance 02	<u>C9: Implementation of Management Plans</u> The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including sub-plans).	The CEMP and sub-plans were generally compliant with the requirements of the Development Consent SSD 8766 and were reviewed and maintained, however during this audit the implementation of some of the process and procedures were not evident, including the following: No evidence provided for management review meetings; No audit schedule provided; and Environmental performance trend to be included in Monthly Report. The above lack of evidence constitutes non-compliant to the implementation of Construction Environmental Management Plan (CEMP) as per Condition C9.	It is recommended to conduct an internal review of the CEMP and its implementation, specifically the implementation of audit schedule, management review and performance evaluation.

In addition to the non-compliances raised, the auditor identified two opportunities for improvement for the continual improvement of the environmental performance of the project.

OFI Number	Consent Condition Description	Audit Findings	Recommendations
Opportunity for Improvement-01	<u>A11: Staging, Combining and Updating Strategies, Plans and Programs</u> With the approval of the Planning Secretary, the Applicant may:	The auditors review the Staging Report Rev 10b, and it was noted that the requirements for the following conditions were not included or defined in the Staging Report:	An update of the Staging Report Rev.10b dated 25/11/19, is recommended to ensure that the conditions B18, B37 and B38 are included at each relevant stage and will be implemented accordingly.

OFI Number	Consent Condition Description	Audit Findings	Recommendations
	(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and 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).	<ul style="list-style-type: none"> - B18: Access for People with Disabilities - B37: Car Parking and Service Vehicle Layout - B38: Bicycle Parking and End-of-trip Facilities 	
Opportunity for Improvement - 02	<p><u>C51: Review of Strategies, Plans and Programs</u></p> <p>Within 3 months of:</p> <ul style="list-style-type: none"> a) the submission of a compliance report; b) the submission of an incident report; c) the submission of an Independent Audit; d) the approval of any modification of the conditions of this consent; e) the issue of a direction of the Planning Secretary under condition A2 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>	<p>It was noted that the Construction Traffic Pedestrian Management Sub-Plan (CTPMSP) Revision 14 has not been reviewed since 10/04/19 and no changes were noted in the plan; therefore, it appears this plan was not review within the required timeframe as per condition C51.</p>	<p>It is recommended to indicate in the CEMP document approval table (front page) the revision of any subplans, even if no changes are made in those subplans.</p> <p>Also, the revision number of the CEMP needs to be consistent in all pages.</p>

Appendix A. Auditors Approval

	Planning & Environment	Contact: Kate Moore Phone: 02 9274 6095 Email: compliance@planning.nsw.gov.au
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Ms Rachel Mitchell
Planning Advisor
Health Infrastructure
Level 14
77 Pacific Highway
NORTH SYDNEY NSW 2060

BY EMAIL ONLY: Rachel.Mitchell@health.nsw.gov.au

Dear Ms Mitchell

**Nepean Hospital and Integrated Ambulatory Services
Redevelopment (Stage 1) (SSD 8766)
Condition C39**

I refer to your submission dated 8 March 2018 seeking the agreement of the Planning Secretary of the Department of Planning and Environment ("Department") of the suitability of the Auditor's qualifications, experience and independence to undertake an independent audit of the Nepean Hospital and Integrated Ambulatory Services Redevelopment (Stage 1) (SSD 8766) ("Project").

In accordance with Condition C39 and the *Independent Audit Post Approvals Requirements (June 2018)*, the Planning Secretary has agreed to the following audit team:


- Annabelle Tungol – Lead Auditor;
- Ana Marie Munoz – Auditor; and
- Luis Garzon – Assistant Auditor.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements (June 2018)*.

If you wish to discuss the above, please do not hesitate to contact Kate Moore on (02) 8274 6095 or by email on compliance@planning.nsw.gov.au.

Yours sincerely,




Kate Moore
A/Principal Compliance Officer (Social Infrastructure)
As Nominee of the Secretary
Dated: 20/03/19

Department of Planning and Environment
320 Pitt Street Sydney 2000 | GPO Box 39 Sydney 2001 | 1300 305 695 | planning.nsw.gov.au

Appendix B. Audit Attendance Sheet

AUDIT ATTENDANCE SHEET

















PROJECT: Nepean Hospital Redevelopment AUDIT No.: _____

AUDITEE: CPB Contractors LEAD AUDITOR: Annabelle Tunjoi

MEETING LOCATION: Derby Street, Kingswood

OPENING MEETING DATE AND TIME: 26/11/19 8:35am

CLOSING MEETING DATE AND TIME: 26/11/19 4:00pm

NAME	ORGANISATION	POSITION	SIGNATURE	
			OPENING MEETING	CLOSING MEETING
Ana Munoz	AQUAS	Environmental Auditor		
Annabelle Tunjoi	AQUAS	Env. Auditor		
STEFEN JANSON	CBRE	PROJECT Manager		
MOHAMMAD ASHARS	HI	PROJECT Director		
Mark MITTICA	CPB	Asst Manager		
Mark Elmes	CPB	Project Engineer		
Adrian Timp	HI	Senior Net Director		

Date: 04.06.14

F-02 Audit Attendance Sheet Rev.1

Page: 1 of 1

Uncontrolled when printed

Appendix C. Independent Audit Declaration Form

Independent Audit Declaration Form Template

Independent Audit Declaration Form

Project Name: Nepean Hospital and Integrated Ambulatory Services

Consent Number: SSD 8766

Description of Project: Redevelopment of the Nepean Hospital, including the demolition of existing structures and construction of a 14 storey Stage 1 Tower for Hospital Services

Project Address: 35-65 Derby Street, Kingswood, Penrith 2747

Proponent: Health Administration Corporation

Title of Audit: Independent Environmental Audit

Date: 5 December 2019

I declare that I will undertake the Independent Audits and prepare the contents of the Independent Audit Reports and to the best of my knowledge:

- The audit has been undertaken in accordance with the relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- The findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- 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;
- neither I nor any technical specialist that may take part in the Independent Audits are an Environmental Representative for the project; and
- 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) 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: Annabelle Tungol

Signature: |



Qualification: Lead Environmental Auditor – Exemplar Global Certificate No. 119536

Company: AQUAS Pty Ltd

Company Address: Level 7 / 116 Miller Street, North Sydney, NSW, 2060

Appendix D. Audit Checklist and Audit Findings

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
1.0	PART A - ADMINISTRATIVE CONDITIONS					
1.1	A	A1	Obligation to Minimise Harm to the Environment 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.	There was no material harm reported to date. The site activities during this audit was mainly excavation, crane works, formwork and scaffolding. Observations raised during the site inspection were rectified immediately during the audit.		Compliant
1.2	A	A2	Terms of Consent The development may only be carried out:	The development has been carried out in accordance with all written directions of the Department and the approved plans. Modification 2 approved on the 10/10/19 had refinements to the design. Updated plans have been posted in the Health Infrastructure Project website and stamped by DPIE dated 10/10/19.	Based on the audit identifying one non-compliance for the project, condition A2 (a) is assessed as non-compliant.	Not-Compliance-01
	A	A2 (a)	in compliance with the conditions of this consent;			
	A	A2 (b)	in accordance with all written directions of the Planning Secretary;			
	A	A2 (c)	generally in accordance with the EIS and Response to Submissions;			
	A	A2 (d)	in accordance with the approved plans in the table below:			
	A	A2	* Architectural Plans prepared by BVN * Landscape Plans prepared by Arcadia Landscape Architecture * Concept Stormwater, sediment and erosion Control Plan prepared by Bonacci			
1.3	A	A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:	Modification 1: amend condition of consent B10, approved by DPIE on 25/6/19 Modification 2: approval to design refinements, approved by DPIE on 10/10/19		Compliant
	A	A3 (a)	the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise			

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and	Modification 3: amend condition of consent B9, approved by DPIE on 14/8/19 Modification 4: establish the Staging Report to amend conditions 'prior commencement of construction'. Submission was made on the 25/11/19 (Rev.10b) and modification was approved by DPIE on 2/12/19.		
	A	A3 (b)	the implementation of any actions or measures contained in any such document referred to in (a) above.			
1.4	A	A7	Planning Secretary as Moderator In the event of a dispute between the Applicant and a public parking 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.	Noted. No disputes to date.		Not Triggered
1.5	A	A8	Long Service Levy For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441.	NSW Government Long Service Corporation Levy Receipt No 00376269 – 8/4/19 was sighted as evidence. For CC2: 2nd Long Service Levy was paid on 20/8/19 with Receipt 00393270. 3rd Long Service Levy was paid on 2/9/19 with receipt 00394907.		Compliant
1.6	A	A9	Legal Notices Any advice or notice to the consent authority must be served on the Planning Secretary.	No legal notices received.		Not Triggered
1.7	A	A11	Staging, Combining and Updating Strategies, Plans and Programs With the approval of the Planning Secretary, the Applicant may:	Modification 4 (MOD 4) sought to establish a staging report of the project.	Opportunity for Improvement 01: The auditors review the Staging Report Rev 10b, and it was noted that the	Compliant

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
	A	A11 (a)	prepare and submit any strategy, 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 or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	First submission (Rev.4) was sent to DPIE on the 17/9/19 and last changes / submission was made on the 25/11/19 (Rev 10b). Final approval by DPIE was granted 2/12/19. However, it was noted that some conditions from Part B were not explicitly included in the Staging Report, as noted in this audit.	requirements for the following conditions were not included or defined in the Staging Report: - B18: Access for People with Disabilities - B37: Car Parking and Service Vehicle Layout - B38: Bicycle Parking and End-of-trip Facilities	
	A	A11 (b)	combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and			
	A	A11 (c)	update any strategy, plan or program required by this consent (to ensure the strategies, plans and 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).			
1.8	A	A12	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition.	Staging report submitted to DPIE 25/11/19 (Rev 10b). Consultation was carried out with DPIE, HI, CBRE and CPB.		Compliant
1.9	A	A13	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Staging report dated 25/11/19 (Rev 10b) approved by DPIE on 2/12/19. Conditions will be monitored and implemented at each stage, as per the Staging Report.		Not Triggered
1.10	A	A14	Demolition Demolition work must comply with AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 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	Certificate of Design from Bonacci 18/4/19 - BCA Crown Certificate dated 2/5/19 CRO-18117 includes reference to Certificate of Design. Also, in the Staging Report, Stage 5 indicates the Demolition of Child Care building will be prepared during the second Quarter of 2020.		Not Triggered

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			the statement of compliance must be submitted to the Certifying Authority before the commencement of works.			
1.11	A	A16	External Walls and Cladding The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Part of Stage 3 of the Staging Report dated 25/11/19 (Rev.10b).		Not Triggered
1.12	A	A18	However, 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.	No known update of guideline, protocol, Standard or policy that affects the current development design or monitoring.		Not Triggered
1.13	A	A19	Monitoring and Environmental Audits 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, noncompliance notification, compliance reporting and independent auditing. <i>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</i>	Environmental inspections have been carried out weekly by CPB, sighted records 14/11/19, 7/11/19, 17/10/19 and 9/10/19. No other audits have been carried out by CPB this year. Last audit was on 30/4/19. Monitoring happening, sighted records for: Asbestos monitoring: daily 24/10/19 JBS&G 6 devices installed in the site less than 0.01 fibres/ml		Compliant

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			<i>compliance with the consent or the environmental management or impact of the development.</i>			
1.14	A	A20	Access to Information 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:	Health Infrastructure had set up the website for the project: http://nepeanredevelopment.health.nsw.gov.au/SSDA-documents		Compliant
	A	A20 (a) (i)	the documents referred to in condition A2 of this consent;	Approved plans sighted in HI website dated 25 Feb 2019 stamped by DPIE. - architectural plans dated 9/7/19, - landscape plans dated 3/9/18 - concept stormwater, sediment and erosion control plan dated 23/7/19 - swept path analysis and signage plan dated 19/9/19 all posted in the website.		
	A	A20 (a) (ii)	all current statutory approvals for the development;	SSD 8766 Conditions dated 25/2/19 includes MOD 1, MOD 2 and MOD 3 posted in the website.		
	A	A20 (a) (iii)	all approved strategies, plans and programs required under the conditions of this consent;	CEMP & subplans Rev.0 dated 15/3/19 posted in the website. Revision 2.0 dated 20/10/19 posted.		
	A	A20 (a) (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;	Audit report includes environmental performance. Sighted Rev.2 dated 9/9/19.		
	A	A20 (a) (v)	a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any	Dust monitoring results (Rev.0) 31/10/19 from JBS&G have been posted in the website as well as vibration monitoring results.		

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			conditions of this consent, or any approved plans and programs;			
	A	A20 (a) (vi)	a summary of the current stage and progress of the development;	Project details and progress included in: http://www.nepeanredevelopment.health.nsw.gov.au/		
	A	A20 (a) (vii)	contact details to enquire about the development or to make a complaint;	Contact us' function available in website		
	A	A20 (a) (viii)	a complaints register, updated monthly;	Complaints register has been posted. No complaints received for the project.		
	A	A20 (a) (ix)	audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report;	Independent Audit report (Rev.2 - 9/9/19) and response to report dated 13/9/19 posted in website.		
	A	A20 (a) (x)	any other matter required by the Planning Secretary; and	No other information has been requested.		
	A	A20 (b)	keep such information up to date, to the satisfaction of the Planning Secretary.	Noted		
1.15	A	A21	Compliance 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.	Induction to all project staff includes environmental aspects including those required by SSD 8766 conditions.		Compliant
	A	A22 NEW	Temporary Western Façade Within 36 months after the commencement of operation, the Applicant must return any sections of the temporary façade on the western elevation of the building that are not required for connection to any future building, to the permanent facade as per materials and finishes shown on plan A0-305 prepared by BVN dated 27/9/19, provided as part of the section 4.55 modification application (SSD 8766 MOD 2).	Request for quotation façade and safe access system sighted 15/11/19 Transmittal from Aconex No. Con-TTRAN-000019 mail number Con-TTRAN-000026		Not Triggered

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
1.16	A	AN1	Advisory Notes All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	No other permits and licenses for the project have been required, so far.		Not Triggered
2.0 PART B - PRIOR TO COMMENCEMENT OF CONSTRUCTION						
2.2	B	B2	If the construction or operation of the development is to be staged, the Department 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.	Staging Report (25/11/19 Rev.10b) submitted to DPIE. Report was approved on the 2/12/19. Notification to DPIE before start of Stage 1 was sent on 3/5/19 with CC CRO-18117 2/5/19. Stage 2 letter sent on the 3/9/19 with Crown Certificate for Inground Works & Above Ground Structure - Tower Building 1 CC CRO-18145 3/9/19. Works includes: - inground services - installation of insitu concrete structural works on Levels 00 to level 14 including the construction of columns, walls, suspended slabs and the fire isolated lift stairway and service riser shafts - installation of blockwork associated with structural activities - installation of structural steel - installation of the roof structure building		Compliant
2.4	B	B4	Reflectivity The building materials used on the facades of all buildings will be designed so as not to result in glare that causes discomfort or threatens the safety of pedestrians or drivers. A	Reflectivity Report Nepean Hospital NSW Infrastructure dated 19/11/19 Reference 18034 Rev.1. Report submitted to Certifier on the 21/11/19.		Compliant

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			report/statement demonstrating consistency with this requirement will be submitted to the satisfaction of the Certifying Authority prior to the commencement of facade works.			
2.5	B	B5	External Walls and Cladding 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.	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be during Stage 3 (from Quarter 4 - 2019 to Quarter 4 - 2021) Non-Compliance is now closed as Modification 4 - Staging report was approved on 2/12/19.		Not Triggered
2.6	B	B6	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.	Part of the Staging Report approved by DPIE on 2/12/19.		Not Triggered
2.9	B	B9	Upon completion of each stage of remedial works, in accordance with the Site Audit Report - Staging Plan prepared by JBS&G and dated 12/8/19, the Applicant must submit a Site Audit Report and Section A Site Audit Statement for the relevant part of the site prepared by a NSW EPA accredited Site Auditor. The Site Audit Report and Section A Site Audit Statement must verify the relevant part of the site is suitable for the hospital land use and be provided to the satisfaction of the Certifying Authority.	Site Audit Report and Section A Site Audit Statement is in progress. SSD8766 Mod 3 approved 14/08/2019 addresses process and timing of Site Audit reports.		Not Triggered

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
2.10	B	B10	Unexpected Contamination Procedure Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure the potentially contaminated material is appropriately managed. The procedure must form part of the CEMP in accordance with condition B20 and where any material identified as contaminated is to be disposed offsite the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	UCP included in the RAP prepared by JBS&G, 16/04/2019 Rev.1 - Appendix 11 to the CEMP. No unexpected findings.		Compliant
2.11	B	B11	Utility and Services Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Letters to utility and service providers were sent. Sighted evidence for: - Sydney Water Case Number 168712v2 Notice of Requirements 25/10/18 for Section 73 Subdivider/Developer Compliance Certificate (Sydney Water Act 1994, Part 6 Division 9). - Nepean Hospital Cancer Care Fire Services Connection email dated 29/11/18, No. 5536000. - Endeavour Energy REF ULL2663-201701583001 email dated 29/01/19. - Endeavour Energy Certified Connection of Load Lot 1 DP 1114090 35-65 Derby Street Kingswood design package for certified drawing 514508B dated 4/7/19.		Not Triggered
2.12	B	B12	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory	No utility works/above ground works conducted to date.		Not Triggered

Audit Compliance Codes: C: Compliant NC: Non-Complaint; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			arrangements have been made to ensure provisions of adequate services.			
2.16	B	B16	Ecologically Sustainable Development Within 6 months of the commencement of construction, the Applicant must register for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifying Authority unless the NSW Health Engineering Services Guidelines are updated demonstrating equivalency with an accredited rating scheme to the satisfaction of the Planning Secretary.	Sighted ESD Framework and Guidelines - Request for agreement of alternative framework. DPIE approval letter dated 22/10/19 for the SSD8766 Nepean Hospital Conditions B16 and D35.		Compliant
2.17	B	B17	Outdoor Lighting Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Lighting must comply with any recommendations of the review undertaken under condition B44 to ensure the ongoing safe operations of the existing helipad on the site. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority.	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be during Stage 3 (from Quarter 4 - 2019 to Quarter 4 - 2021) Non-Compliance is now closed as Modification 4 - Staging report was approved on 2/12/19.		Not Triggered
2.18	B	B18	Access for People with Disabilities 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	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 3 (from Quarter 4 - 2019 to Quarter 4 - 2021).		Not Triggered

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			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.			
2.19	B	B19	Environmental Management Plan Management Plans required under this consent must be prepared in accordance with relevant guidelines and include: a) detailed baseline data; b) details of:	CEMP Revised 20/10/19.		Compliant
	B	B19 (b) (i)	the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Element 3 makes reference to the Legal and other obligations register.		
	B	B19 (b) (ii)	any relevant limits or performance measures and criteria; and	Relevant criteria were noted in each sub-plans refer to Noise and Vibration Management Plan. Section 2.3 of CEMP defined the objectives and targets.		
	B	B19 (b) (iii)	the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Table 2.1 of CEMP includes the KPIs, targets, timeframe, actions and accountability.		
	B	B19 (c)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Relevant measures were defined in each sub-plans.		
	B	B19 (d)	a program to monitor and report on the:	Appendix C - MIDDA Schedule includes Monitoring activities such as: traffic, weather, waste, air quality, noise, vibration and energy. Each activity includes details, frequency, responsible and resources needed. OFI-01 from previous audit now closed.		
	B	B19 (d) (i)	impacts and environmental performance of the development;	Element 4 of the CEMP includes risk and opportunity management which refers to		

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				the Environmental Risk Register and risk assessments.		
	B	B19 (d) (ii)	effectiveness of the management measures set out pursuant to paragraph (c) above;	Workplace inspections were conducted. Review of site Environmental Controls was done fortnightly by SHEQ Advisor.		
	B	B19 (e)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Unexpected procedures part of the RAP.		
	B	B19 (f)	a program to investigate and implement ways to improve the environmental performance of the development over time;	Element 12 indicates that environmental performance trends will be reviewed monthly - sighted SHEQ Monthly Dashboard.		
	B	B19 (g)	a protocol for managing and reporting any: incidents, non-compliance, complaint, failure to comply with statutory requirements	Element 9 includes details of incident management Element 3 (3.5) includes reporting of non-compliances including events reported by the regulator. Element 6 (6.5) includes details for responding to complaints and enquiries		
	B	B19 (h)	a protocol for periodic review of the plan	Appendix C - MIDDA Schedule indicates EMP will be reviewed quarterly.		
2.28	B	B28	Roads Design and Traffic Facilities All roads and traffic facilities must be designed to meet the requirements of Council or RMS (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	No roads and traffic facilities construction. There will be only internal roads.		Not Triggered
2.29	B	B29	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	Certificate of Design - Civil dated 18/4/19 from Bonacci.		Compliant

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			satisfaction of the Certifying Authority. The system must:			
	B	B29 (b)	be generally in accordance with the conceptual design in the EIS as modified in the RIS and section 4.55 modification application (SSD 8766 MOD 2)	In compliance with the SSDA 8876 approved 25/2/19, Part of MOD 2.		
2.30	B	B30	Operational Noise - Design of Mechanical Plant and Equipment Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the Acoustic Assessment (Rev 9), prepared by Acoustic Logic dated 15/11/18, 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 Acoustic Assessment.	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 3 (from Quarter 4 - 2019 to Quarter 4 - 2021) Non-Compliance is now closed as Modification 4 - Staging report was approved on 2/12/19.		Not Triggered
2.33	B	B33	Operational Waste Storage and Processing Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	It was noted in the Staging Report that there will be no waste to be removed by Council. Therefore, this not triggered.		Not Triggered
2.34	B	B34	Mechanical Ventilation All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 <i>The use of air-conditioning in buildings – Mechanical ventilation in buildings</i> and AS/NZS 3666.1:2011 <i>Air handling and water systems of buildings– Microbial control</i> to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifying	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 3 (from Quarter 4 - 2019 to Quarter 4 - 2021) Non-Compliance is now closed as Modification 4 - Staging report was approved on 2/12/19.		Not Triggered

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			Authority prior to the commencement of construction.			
2.35	B	B35	Rainwater Harvesting Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 2 - rainwater and harvesting design (from Quarter 3 - 2019 to Quarter 4 - 2020). Non-Compliance is now closed as Modification 4 - Staging report was approved on 2/12/19.		Not Triggered
37	B	B37	Car Parking and Service Vehicle Layout Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 4 (from Quarter 4 - 2020 to Quarter 4 - 2021). It was noted that this condition was not explicitly included in the Staging Report (Rev.10b 25/11/19).		Not Triggered
	B	B37 (a)	all vehicles must enter and leave the Site in a forward direction;			
	B	B37 (b)	minimum of 59 on-site car parking spaces for use during operation of the development and designed in accordance with the latest version of AS2890.1;			
2.38	B	B38	Bicycle Parking and End-of-trip Facilities 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:	SSD modification (MOD 4) with Staging Report was issued to DPIE on 25/11/19. Report captures required consent condition approvals and certifications, this will be done during Stage 4 (from Quarter 4 - 2020 to Quarter 4 - 2021). It was noted that this condition was not explicitly included in the Staging Report (Rev.10b 25/11/19).		Not Triggered
	B	B38 (a)	the provision of a minimum 25 bicycle parking spaces;			
	B	B38 (b)	the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 <i>Parking facilities - Bicycle parking</i> ;			

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			and be located in easy to access, well-lit areas that incorporate passive surveillance;			
	B	B38 (c)	the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool;			
	B	B38 (d)	appropriate pedestrian and cyclist advisory signs are to be provided; and			
	B	B38 (e)	all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority			
2.39	B	B39	Public Domain Works Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority 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 Certifying Authority.	No footpath or public domain works conducted to date. This will be addressed as part of Stage 4 (Quarter 4 - 2020 to Quarter 4 - 2021) as indicated in the Staging Report issued to DPIE on 25/11/19 and approved on 2/12/19 (SSD modification (MOD 4).		Not Triggered
2.40	B	B40	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.	The Compliance Monitoring and Reporting Program Report for Pre-construction phase was prepared on the 5/4/19. Program was then updated on 11/4/19 and posted in the HI website. Compliance Report (Construction phase) to be submitted at the end of November 2019 in accordance with Staging Report.		Compliant
2.41	B	B41	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	Compliance Report noted above is as per Compliance Reporting Post Approval Requirements (Department 2018).		Compliant
2.42		B42	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the	Pre-construction compliance report dated 2/10/19 was sent to DPIE 15/10/19.		Compliant

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			Certifying Authority in writing at least seven days before this is done.	Compliance construction report - not yet submitted at the time of the audit.		
2.43	B	B43	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (Department 2018), 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.	No request to cease the ongoing annual operational compliance reports received to date.		Not Triggered
2.44	B	B44	Existing Helipad / Helicopter Operations During Construction Prior to the commencement of construction, helipad / helicopter operations at the site are to be reviewed by a suitably qualified and experienced aviation professional in consultation with relevant stakeholders. The review must consider the proposed construction methodology including plant and equipment to be used (including lighting and cranes) and recommend changes to the construction methodology and / or flight paths where required to ensure safe ongoing helicopter operations at the site. A report summarising the outcome of the review must be submitted to the Certifying Authority.	Included in Stage 3 of the Staging Report approved by DPIE on 2/12/19. Aviation Report issued to Certifying Authority, prepared by AviPro dated 4.11.19 Rev.1.7. Design Report 80% updated schematics & imagery.		Compliant
2.45	B	B45	Proposed Helipad Design Prior to the construction of the proposed helipad, a report prepared by a suitably qualified and experienced aviation professional must be submitted to the satisfaction of the Certifying Authority which states that the design of the helipad incorporates the relevant details outlined in Civil Aviation Safety Authority Civil Aviation Advisory Publication CAAP 92-2(2) Guidelines for	Included in Stage 3 of the Staging Report approved by DPIE on 2/12/19. Aviation Report issued to Certifying Authority, prepared by AviPro dated 4.11.19 Rev.1.7. Design Report 80% updated schematics & imagery.		Not Triggered

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			the establishment and other relevant National and International guidelines.			
2.46	B	B46	Proposed Helipad Operations Prior to the construction of the helipad, future ongoing helicopter operations to the site are to be reviewed by a suitably qualified and experienced aviation professional. Proposed flight paths to the helipad shall be identified in consultation with relevant stakeholders in accordance with Civil Aviation Safety Authority Civil Aviation Advisory Publication CAAP 92-2(2) Guidelines for the establishment and other relevant National and International guidelines. A report summarising the outcome of the review and a Three-dimensional Visual Flight Rules Approach and Departure Path and Transitional Surface Survey must be submitted to the satisfaction of Certifying Authority and a copy submitted to the Department and Council.	Included in Stage 3 of the Staging Report approved by DPIE on 2/12/19. Aviation Report issued to Certifying Authority, prepared by AviPro dated 4.11.19 Rev.1.7. Design Report 80% updated schematics & imagery.		Not Triggered
3.0	PART C - DURING CONSTRUCTION					
3.1	C	C1	Approved Plans on Site A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for perusal by any officer of the Department, Council or the Certifying Authority.	Approved plans were electronically available on Aconex, website and hard copies on site.		Compliant
3.2	C	C2	Site Notice A site notice(s):	Site notice displayed near the access/egress gate of the site.		Compliant
	C	C2 (a)	must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer.	Site notice includes all the required information as per this condition. Builder, Certifying Authority, Structural Engineer and approved working hours		

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	C	C2 (b)	is to satisfy all but not be limited to, the following requirements:	included. Previous non-compliance Closed.		
	C	C2 (b) (i)	minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size;			
	C	C2 (b) (ii)	the notice is to be durable and weatherproof and is to be displayed throughout the works period;			
	C	C2 (b) (iii)	the approved hours of work, the name of the 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; and			
	C	C2 (b) (iv)	the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.			
3.3	C	C3	Operation of Plant and Equipment All plant and equipment used on site, or to monitor the performance of the development must be:	Sighted log book and verification of competency for working around live power and excavator 29/7/19 - exp. 29/7/20. Sighted plant risk assessment for excavator - large (20 tonne +) 8/2/19 Tower Crane Operator license 17/1/22 2. HRW7574& log book. Scaffold Tag 26/11/19 No. 56515-56516		Compliant
	C	C3 (a)	maintained in a proper and efficient condition; and			
	C	C3 (b)	operated in a proper and efficient manner.			
3.4	C	C4	Demolition Demolition work must comply with <i>Australian Standard AS 2601-2001</i> The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals	Demolition is not required until the Stage 5 (as per Stage Report Rev. 10b – 25/11/19) is required for the demolition of the Childcare.		Not Triggered

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			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 Certifying Authority before the commencement of works.			
3.5	C	C5	Construction Hours Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:	The CEMP, NVMP and CTMP included working hours. No work has been carried out on Sundays.		Compliant
	C	C5 (a)	between 7am and 6pm, Mondays to Fridays inclusive; and			
	C	C5 (b)	between 7am and 5pm, Saturdays.			
	C	C5	No work may be carried out on Sundays or public holidays.			
3.6	C	C6	Activities may be undertaken outside of the hours in condition C5 if required:	No out of hours work conducted to date		Not Triggered
	C	C6 (a)	by the Police or a public authority for the delivery of vehicles, plant or materials; or			
	C	C6 (b)	in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or			
	C	C6 (c)	where the works are inaudible at the nearest sensitive receivers; or			
	C	C6 (d)	where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works.			
3.7	C	C7	Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	No out of hours work conducted to date		Not Triggered
3.8	C	C8	Rock breaking, rock hammering, sheet piling, pile driving, and similar activities may only be carried out between the following hours:	None		Not Triggered
	C	C8 (a)	9am to 12pm, Monday to Friday;			
	C	C8 (b)	2pm to 5pm Monday to Friday; and			

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	C	C8 (c)	9am to 12pm, Saturday.			
3.9	C	C9	Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	The following plan and sub-plans have been reviewed and updated: <ul style="list-style-type: none"> - CEMP updated 20/10/19 - Rev. 3 - CNVMSP updated 15/8/19 Rev.2 - CWMSP updated 30/7/19 Rev.2 - CSWMSP updated 1/8/19 Rev. C - FERSP updated 15/8/19 Rev. D It was noted that the CTPMSP Rev.14 remained the same, no changes made since 10/4/19. Implementation of some of the CEMP process and procedures were not evident.	Non-Compliance 02: The CEMP and sub-plans were generally compliant with the requirements of the Development Consent SSD 8766 and were reviewed and maintained, however during this audit the implementation of some of the process and procedures were not evident, including the following: <ul style="list-style-type: none"> - No evidence provided for management review meetings; - No audit schedule provided; and - Environmental performance trend to be included in Monthly Report. The above lack of evidence constitutes non-compliant to the implementation of Construction Environmental Management Plan (CEMP) as per Condition C9.	Non-Compliance-02
3.10	C	C10	Construction Traffic All construction vehicles (excluding worker 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 before stopping.	Traffic control plan continue to be implemented.		Compliant

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3.11	C	C11	Road Occupancy Licence A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	A ROL has not been required to date.		Not Triggered
3.12	C	C12	SafeWork Requirements To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant Safe Work requirements.	Site fenced and secured, traffic control plan implemented and traffic controllers in place. Pedestrian access and signs in place. Pre-start briefings in place. Sighted SDS for Diesel Fuel (BP Australia) dated 25/5/16, Unleaded 91 (BP Australia) dated 1/9/16 and Premium Unleaded 95 (BP Australia) dated 16/9/16. Previous OFI closed. License for Excavator Operator in place; also, pre-start log book completed 26/11/19.		Compliant
3.13	C	C13	Hoarding Requirements The following hoarding requirements must be complied with:	Class A hoarding (2.7 meters) was installed around the site. Near sensitive receiver were installed with plywood for noise control)		Compliant
	C	C13 (a)	no third-party advertising is permitted to be displayed on the subject hoarding/ fencing;	There was no advertising noted around the site fence.		
	C	C13 (b)	the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application; and	There was no graffiti noted around the site fence.		
	C	C13 (c)	the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	None on Council land.		

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3.14	C	C14	No Obstruction of Public Way The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances, unless prior approval has been obtained from the relevant authority. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	There was no obstruction on public access.		Compliant
3.15	C	C15	Construction Noise Limits The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	Noise barrier was installed around the Child Care Centre. NVMP has been implemented as well as the noise and vibration monitoring.		Compliant
3.16	C	C16	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 C5.	Subcontractors toolbox talks, and induction included the approved working hours. There was no noise complaint regarding construction vehicles arriving at the site outside approved working hours.		Compliant
3.17	C	C17	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers.	The excavators were installed with quacker/s sound. CPB noted that the use of quackers on every moving plant will be implemented.		Compliant

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3.18	C	C18	Any noise generated during construction of the development must not be offensive noise within the meaning of the <i>Protection of the Environment Operations Act 1997</i> or exceed approved noise limits for the site.	Majority of current construction noise is generated from concrete pumping, report from Acoustic sighted.		Compliant
3.19	C	C19	To provide a noise barrier during works, a Temporary 2.7m high solid noise screen around the perimeter of the child care centre area is to be erected and managed during the demolition and construction.	Noise barrier were installed around the Child Care Centre - window treatment and temporary 2.7m plywood screen were installed.		Compliant
3.20	C	C20	Vibration Criteria Vibration caused by construction at any residence or structure outside the site must be limited to:	Sighted Vibration monitoring report 25 (11/11/19 to 18/11/19) results show exceedances for the east block (op theatre) and child care centre above 0.28 and 1.1 respectively. The process is that an email is sent to CBRE notifying of exceedances, sighted example for 23/9/19. Vibration monitoring report from Acoustic Logic: week period 4/11/19 - 11/11/19; location east block (op theatre) and child care - due to piling activities, roller compactor.		Compliant
	C	C20 (a)	for structural damage, the latest version of <i>DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures</i> (German Institute for Standardisation, 1999); and			
	C	C20 (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).			
3.21	C	C21	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 C20.	Used but not closer than 30mts.		Compliant
3.22	C	C22	The limits in conditions C20 and C21 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B23 of this consent.	Noted. Section 4.2 of the NVMP defined the construction vibration criteria in accordance with ICNG.		Compliant

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3.23	C	C23	Detailed Site Investigation Following the demolition of any existing structures, infrastructure and in ground utilities, the Applicant is to carry out further investigation of soil contamination (including within the footprint and immediate surrounds of those structures, infrastructures and utilities prior to undertaking any construction) to address any contamination with regard to the following:	JBS&G conducted the pre-classification of the whole building footprint prior to excavation. There was no reported contamination and soil was classified as VENM. No further assessment required. L006 - Virgin Excavated Natural Material Assessment - main Works Redevelopment, Nepean Hospital Kingswood 2747 by JBS&G dated 4/10/18.		Compliant
	C	C23 (a)	NSW EPA Sampling Design Guidelines;	Section 5.1 includes reference to Guidelines 1995		
	C	C23 (b)	Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017;	Section 5.1 references the Guidelines 2017 and section 5.3.1 includes the guidance on the soil remediation		
	C	C23 (c)	Guidelines for Consultants Reporting on Contamination Sites, 2011; and	Section 5.1 includes reference to Guidelines 2011.		
	C	C23 (d)	The National Environment Protection (Assessment of Contamination) Measure.	Section 5.1 includes reference to Guidelines (2013)		
3.24	C	C24	The RAP must be updated based on the findings of the further site investigation constructed once existing buildings are demolished on the site.	RAP not revised since 16/4/19 (Rev.1). No unexpected finds to date.		Not Triggered
3.25	C	C25	Tree Protection For the duration of the construction works:	No trees within the project footprint that needs to be protected.		Compliant
	C	C25 (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;			
	C	C25 (b)	all street trees 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 of Council;			

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
	C	C25 (c)	all trees on the site that are not approved for removal must be suitably protected during construction as per recommendations of the Arboricultural development Assessment Report prepared by Moore Trees Arboricultural Services dated 26/11/18; and			
	C	C25 (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.			
3.26	C	C26	Dust Minimisation The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Dust gauge monitors where located at Child care centre, oral heath, east block, north block, hope cottage, Drug & Alcohol.		Compliant
3.27	C	C27	During construction, the Applicant must ensure that:	Dust monitoring: daily 13/11/19 DMR051 conducted 12/11/19.		Compliant
	C	C27 (a)	exposed surfaces and stockpiles are suppressed by regular watering;	There was 1 exceedance in the drug and alcohol building of 0.063 mg/cube		
	C	C27 (b)	all trucks entering or leaving the site with loads have their loads covered;	threshold is 0.05. This was communicated to CBRE and monitored appropriately.		
	C	C27 (c)	trucks associated with the development do not track dirt onto the public road network;			
	C	C27 (d)	public roads used by these trucks are kept clean; and			
	C	C27 (e)	land stabilisation works are carried out progressively on site to minimise exposed surfaces.			

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
3.28	C	C28	Air quality discharges The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Sighted Daily Airborne Asbestos Fibre Monitoring Report from JBS&G dated 21/11/19 for monitoring on 20/11/19. Sighted Dust Monitoring Report (PM10) - main works for 18/11/19 provided 19/11/19 with one exceedance for D&A ward.		Compliant
3.29	C	C29	Erosion and Sediment Control All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	The erosion and sediment control plan prepared by Bonacci Rev. F dated 20/09/19 was in placed, maintained and implemented.		Compliant
3.30		C30	Imported Soil The Applicant must:	No imported soil brought onto the site to date.		Not Triggered
		C30 (a)	ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;			
		C30 (b)	keep accurate records of the volume and type of fill to be used; and			
		C30 (c)	make these records available to the [Department/Certifying Authority] upon request.			
3.31	C	C31	Disposal of Seepage and Stormwater Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the <i>Protection of the Environment Operations Act 1997</i> .	No discharge of stormwater or seepage to date. Stormwater pits were protected		Compliant
3.32	C	C32	Unexpected Finds Protocol - Aboriginal Heritage In the event that surface disturbance identifies a	No unexpected finds to date.		Not Triggered

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of OEH.			
3.33	C	C33	Unexpected Finds Protocol - Historic Heritage 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 the Heritage Division of the OEH.	No unexpected finds to date.		Not Triggered
3.34	C	C34	Waste Storage and Processing Waste 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.	Wastes bins onsite and recycling is being managed by Bingo. Delivery Dockets No. 20085540-NSTM dated 3/8/19 GSW recyclable Also sighted Clean Concrete Delivery Docket No. 100000165-NSTM dated 6/9/19.		Compliant

Audit Compliance Codes: C: Compliant NC: Non-Compliant; NT: Not triggered

ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
3.35	C	C35	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014)	Sighted Early Work Soil and Water Management Plan Issue C - 0000050 25/3/19.		Compliant
3.36	C	C36	The body of any vehicle or trailer used to transport waste or excavation spoil must be covered before leaving the premises to prevent any spillage or escape of any dust, waste of spoil. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site must be removed before leaving the premises.	Trucks leaving the site covered.		Compliant
3.37	C	C37	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.	No concrete waste and rinse water have been disposed of on the site to date.		Compliant
3.38	C	C38	Handling Asbestos The Applicant is to consult with Safe Work NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – ‘Transportation and management of asbestos waste’ must also be complied with.	Asbestos monitoring in place, no asbestos disposed offsite. Records sighted for: - Airborne Asbestos Fibre Monitoring Report from JBS&G - 21/11/19 - Asbestos monitoring report from JBS&G – 24/10/19 Asbestos were capped within the site as per the RAP. Site Auditor is Senversa.		Compliant
3.39	C	C39	Independent Environmental Audit Proposed 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.	Letter from DPIE with approval for AQUAS auditors received on the 20/3/19.		Compliant
3.40	C	C40	No later than four weeks before the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the independent Audit Post	Audit Program sent to DPE on 14/3/19 version 2.0 and version 3.1 (final) on 28/3/19		Compliant

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.			
3.41	C	C41	Table 1 of the Independent Audit Post Approval Requirements (Department 2009) is amended so that the frequency of audits required in the construction phase is:	Restriction included in section 41.2 of CTMP Department 3.2 of NVMP.		Compliant
	C	C41 (a)	An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and	Audit conducted on 13 June 2019		
	C	C41 (b)	A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit.	Noted		
3.42	C	C42	In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.	Independent Audits not been required to be undertaken at different times to date.		Not Triggered
3.43	C	C43	Independent Audits of the development must be carried out in accordance with:	Independent Audit was carried out within the required timeframe. Audit report followed the methodology from the IAPAR document.		Compliant
	C	C43 (a)	The Independent Audit Program submitted to the Department and the Certifying Authority under condition C39 of this consent; and			
	C	C43 (b)	The requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018)			
3.44	C	C44	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:	Response was sent from HI to DPIE on the 13/9/19 for the Independent Audit Report from AQUAS Audit Reference AQ1245.01		Compliant

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
	C	C44 (a)	review and respond to each Independent Audit Report prepared under condition C38 of this consent;	Rev.2 dated 9/9/19. Response was carried out in accordance DPIE requirements. A list of all non-compliances with relevant actions and timeframe was provided. Response was published in the website.		
	C	C44 (b)	submit the response to the Department and the Certifying Authority; and			
	C	C44 (c)	make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.			
3.45	C	C45	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to cease, where it has been demonstrated to the Planning Secretary's satisfaction that ongoing operational audits are no longer required.	No request to cease the ongoing annual operational audits received to date.		Not Triggered
3.46	C	C46	Incident Notification, Reporting and Response The Department must be notified in writing to compliance@planning.nsw.gov.au 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.	No reportable environmental incidents.		Not Triggered
3.47		C47	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 1.	No reportable environmental incidents.		Not Triggered
3.48	C	C48	Non-compliance Notification The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to	Audit report Rev.2 dated 9/9/19. Notification to DPIE for all NCs raised in the audit was sent on the 13/9/19. Notification to the Certifier on the 18/9/19 Ref No. Con-GCOR-013960 with		Compliant

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.	copy of the audit report, response to report and program.		
3.49		C49	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.	Sighted response from HI to DPIE for the IAR Rev.2 dated 13/9/19.		Compliant
3.50		C50	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted		Not Triggered
3.51	C	C51	Revision of Strategies Plans and Programs Within three months of:	Pre-Construction Compliance Report was prepared on 2/10/19. No incidents reported to date. Independent Audit Report was provided on 9/9/19 (Rev.2). Modifications have been approved as per condition A3. As a result of the above the CEMP was reviewed 20/10/19. Notification the DPIE was sent on the 13/9/19 and Notification to the Certifier on the 18/9/19 Ref No. Con-GCOR-013960 with copy of the audit report. It was suggested that all sub-plans are reviewed as part of the CEMP review. If no changes are required, this should be noted in the document approval table.	Opportunity for Improvement 02: It was noted that the Construction Traffic Pedestrian Management Sub-Plan (CTPMSP) Revision 14 has not been reviewed since 10/04/19 and no changes were noted in the plan. It is recommended to indicate in the CEMP document approval table (front page) the revision of any subplans, even if no changes are made in those subplans. Also, the revision number of the CEMP needs to be consistent in all pages.	Compliant
	C	C51 (a)	the submission of a compliance report under condition B40;			
	C	C51 (b)	the submission of an incident report under condition C46;			
	C	C51 (c)	the submission of an Independent Audit under condition C43;			
	C	C51 (d)	the approval of any modification of the conditions of this consent; or			
	C	C51 (e)	the issue of a direction of the Planning Secretary under condition A2 which requires a review,			
	C	C51	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.			

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
3.52	C	C52	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifying Authority. Where revisions are required, the revised document must be submitted to the Certifying Authority for approval within six weeks of the review.</p> <p><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></p>	<p>CEMP and sub-plans were sent to the Certifier on the 18/9/19 Ref No. Con-GCOR-013960 with copy of the audit report.</p> <p>All Modifications had been approved by DPIE, refer to condition A3 for full details.</p>		Compliant
3.53	C	C53	<p>Operational Noise - Design of Mechanical Plant and Equipment</p> <p>Prior to commencement of the installation and associated construction of plant and equipment, a detailed operational noise and vibration impact assessment shall be submitted to the Certifying Authority and the Department. The assessment must:</p>	NVMP was updated on the 15/8/19 Rev.2. Plan included noise and vibration controls.		Not Triggered
	C	C53 (a)	prepared by a suitably qualified person.	Prepared by Acoustic Logic.		
	C	C53 (b)	detail the operational noise and vibration sources and activities, including mechanical plant.	Included in the NVMP section 5.0 Table 6		
	C	C53 (c)	outline all feasible and reasonable noise and vibration mitigation and management measures to be implemented.	Section 7.0 recommendations and Section 9.0 Additional Noise and Vibration control methods.		
	C	C53 (d)	demonstrate that noise levels will not exceed the recommended operational noise levels identified in the Acoustic Assessment Report (Rev 9) prepared by Acoustic Logic dated 15/11/2018.	Section 6.0 Noise impacts - check report against NVMP.		
	C	C53	The Applicant must incorporate the noise mitigation recommendations in the Acoustic	Noted, design phase is ongoing.		

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			Assessment Report (Rev 9) prepared by Acoustic Logic dated 15/11/2018 into the detailed design drawings.			
	C	C53	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 Acoustic Report.	Noted, design phase is ongoing.		
4	APPENDIX A - WRITTEN NOTIFICATION AND REPORTING					
4.1	Appx	1	A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C32 or, having given such notification, subsequently forms the view that an incident has not occurred.	No reportable environmental incidents.		Not Triggered
4.2	Appx	2	Written notification of an incident must: a) identify the development and application number; b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c) identify how the incident was detected; d) identify when the applicant became aware of the incident; e) identify any actual or potential non-compliance with conditions of consent; f) describe what immediate steps were taken in relation to the incident;	This has not been required yet.		Not Triggered

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ID No.	SSD Part No.	SSD Req. No.	SSD Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Descriptor
			g) identify further action(s) that will be taken in relation to the incident; and h) identify a project contact for further communication regarding the incident.			
4.3	Appx	3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	This has not been required yet.		Not Triggered
4.4	Appx	4	The Incident Report must include: a) a summary of the incident; b) outcomes of an incident investigation, including identification of the cause of the incident; c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d) details of any communication with other stakeholders regarding the incident.	This has not been required yet.		Not Triggered

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Appendix E. Audit Photos

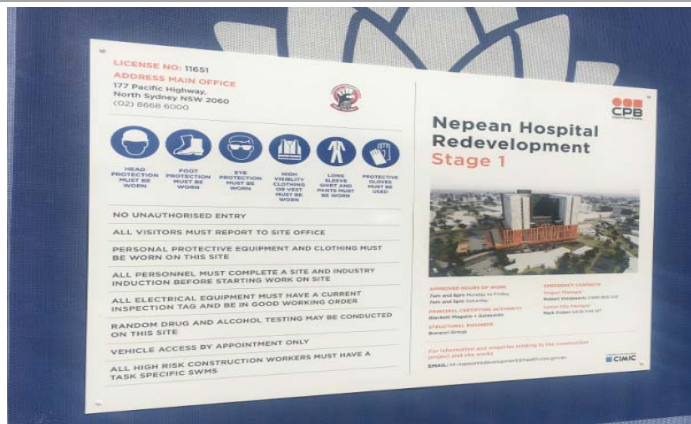


Photo 1 – Site notice displayed at project entrance.



Photo 2 – Roads were free of dust or mud.

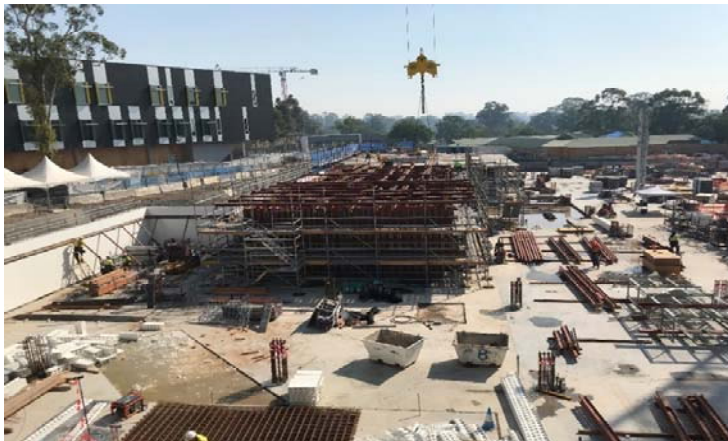


Photo 3 – Looking at the site from the top view, ground level has been concreted.



Photo 4 – Rumble grid was maintained.



Photo 5 – Accumulated silts along the gutter to be removed.



Photo 6 – The silts was cleaned up immediately.



Photo 7 – Sediment cover of the pit needs to be replaced.



Photo 8 – The pit was covered immediately prior to the rain fall.



Photo 9 – Noise and vibration monitoring installed at the childcare centre.



Photo 10 – Traffic Control was in place.



Photo 11 – Recycling Concrete bin was in place.



Photo 12 – Hazardous substances' cage was in place.

Appendix F. Consultation Records

Munoz, Ana-Maria

From: Mohammad Ashari (Health Infrastructure) <Mohammad.Ashari@health.nsw.gov.au>
Sent: Thursday, 21 November 2019 11:33 AM
To: Munoz, Ana-Maria
Cc: Jarvis, Robyn @ Sydney; Tungol, Annabelle
Subject: RE: Nepean Hospital Stage 1 Project (SSD 8766) Independent Environmental Audit (Consultation)

Hi Ana-Maria,

Thanks for your call this morning.

As discussed, we have received a few concerns (via emails) from Childcare and Drug & Alcohol team on excessive amount of dust from construction site, out which CPB had attended to each concerns separately and address them accordingly. I suppose with laying asphalt over the temporary site access towards the north of construction site (which was happened last week) and finishing the concrete pour for the slab on ground, the amount of dust blowing out of site will be significantly reduced.

Regarding the vibration, CPB has placed various vibration monitors around the site with data/reports being issued to CBRE progressively. I have been advised that any exceedance of vibration level or dust level will be communicated to CBRE SPM on spot via text.

Regarding the traffic management, CPB have couple of full time traffic controllers on site which monitors the entry and exit of heavy vehicles on a daily basis with no complaint/concerns being raised by NBMLHD or other neighbours on this matter.

Regarding the communication, we are quite happy with the level of communications by CPB Contractors however, would like to hear your feedback on how things can be improved (upon completion of your second audit).

Last but not least, it would be much appreciated if you can please have a good look at CPB's stormwater management/concrete slurry/overflow clean up/construction waste/etc. during your audit tomorrow.

Kind Regards,

Mohammad Ashari

Project Director | Health Infrastructure

0410 966 694 | mohammad.ashari@health.nsw.gov.au

Level 14, 77 Pacific Highway, North Sydney NSW 2060 | PO Box 1060, North Sydney NSW 2059



Health
Infrastructure

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Safety first, a commitment to our integrated teams.

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Munoz, Ana-Maria

From: Michaela Burgess <Michaela.Burgess@planning.nsw.gov.au>
Sent: Wednesday, 20 November 2019 2:28 PM
To: Munoz, Ana-Maria
Cc: Kate Moore (DPE)
Subject: RE: Nepean Hospital Stage 1 Project (SSD 8766) Independent Environmental Audit (Consultation)

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Ana-Maria

Thank you for your email. The Department requests that all conditions of consent for SSD 8766 are assessed including any approved modifications which are applicable at the time of the audit, and that the audit is conducted in accordance with the requirements of condition C43 of SSD 8766.

If you have any questions please do not hesitate to contact me.

Kind regards
Michaela

Michaela Burgess
Senior Compliance Officer

Planning & Assessment | Department of Planning, Industry and Environment
T 02 8217 2055 | M 0427 749 597 | E michaela.burgess@planning.nsw.gov.au
GPO Box 39 | 320 Pitt St, Sydney NSW 2001
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Please direct all email correspondence to compliance@planning.nsw.gov.au



Planning,
Industry &
Environment

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.