

24 February, 2020

Compliance Department
NSW Department of Planning and Environment
Email: compliance@planning.nsw.gov.au

To Whom It May Concern,

RE: Response to Independent Audit Report - SSDA 8766: Nepean Hospital Integrated Ambulatory Services (Stage 1)

In accordance to Non-Compliance Notification Clause C49 of the State Significant Development Application (SSDA) Consent 8766. Health Infrastructure NSW has received the attached Independent Audit Report from AQUAS. We have reviewed the report and we note that the Independent Auditor, AQUAS, has identified two (2) Non-Conforming conditions and provide the following response and corrective actions:

Finding No.	Conditions of Consent Requirement	AQUAS Findings and Recommendation	Corrective Action / Comments	Timing
Non-Compliance 01	A2: Terms of Consent 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.	When no other Non-Compliances are noted this condition will become Compliant.	Prior to next Audit.
Non-Compliance 02	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 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.	CPB will conduct an internal review of the CEMP and its implementation, specifically the implementation of audit schedule, management review and performance evaluation.	Review of CEMP to be undertaken in January 2020.

The Audit also identified two (2) Opportunities for Improvement. These opportunities are not required to be implemented, however Health Infrastructure NSW has reviewed each opportunity and will implement as outlined below:

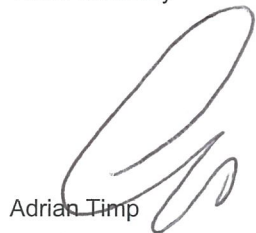
OFI No.	Conditions of Consent Requirement	AQUAS Findings and Recommendation	Corrective Action / Comments	Timing
Opportunity for Improvement-01	A11: Staging, Combining and Updating Strategies, Plans and Programs With the approval of the Planning Secretary, the Applicant may: c) update any strategy, plan 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).	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: - B18: Access for People with Disabilities - B37: Car Parking and Service Vehicle Layout - B38: Bicycle Parking and End-of-trip Facilities	CPB, CBRE and HI will review the Staging Report Rev.10b dated 25/11/19, to ensure that all conditions are included at each relevant stage and will be implemented accordingly.	Review of staging report to be completed in February 2020.
Opportunity for Improvement-02	C51: Review of Strategies, Plans and Programs Within 3 months of: 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 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.	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.	CPB will review the CEMP document approval table (front page) and include the revision of any subplans, even if no changes are made in those subplans. CPB will also ensure the revision number is consistent in all pages	Will be completed in March 2020 in conjunction with the review of the CEMP (NC02)

Conclusion

Based on our review, the results from the Independent Audit were generally satisfactory and in accordance with conditions set out by the SSDA Planning Consent. While AQUAS have identified two (2) Non-Confirming conditions, much of the requirement has been addressed elsewhere by our team and corrective actions were quickly employed to formalise the condition requirement. In our opinion the Non-Conformances do not present any breach of the consent or risk to the development.

Please contact the undersigned if you require further information.

Yours sincerely



Adrian Timp

Senior Project Director

Health Infrastructure NSW