

23 June, 2020

Compliance Department  
 NSW Department of Planning and Environment  
 Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

To Whom It May Concern,

**RE: Response to Independent Audit Report - SSSA 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 (HI) has received the attached Independent Audit Report from AQUAS which covers the period from December 2019 to the end of May 2020.

HI has reviewed the report and we note that the Independent Auditor has confirmed no non-compliances however they have identified two Opportunities for Improvement.

HI has reviewed each opportunity and will implement as outlined in the table below.

OFI No.	Conditions of Consent Requirement	AQUAS Findings and Recommendation	Corrective Action / Comments	Timing
<b>Opportunity for Improvement-01</b>	" C41 Independent Environmental Audit Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is: (a) An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and (b) A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit. "	The proponent had complied with the frequency of audits as per SSD condition C41 and the Audit Program approved by DPIE. The previous three independent audits (including this audit) results had demonstrated that all the required environmental controls have been implemented and the project had a good environmental performance i.e. addressing and closing out of non-compliances, implementing and updating the CEMP and subplans and implementing the environmental mitigation measures.	This was previously noted in CCR2. As a result a revised Independent Audit Programme had already been issued to the DPIE with an amendment of audit frequency to every 12 months. This aligns with the audit frequency noted in Section 2.1 of the Independent Audit Post Approval Requirements June 2018.	Submission of a revised Independent Audit Programme was issued to the DPIE on 20/05/2020. Approval of this audit frequency is expected to be received from the DPIE in June 2020.

OFI No.	Conditions of Consent Requirement	AQUAS Findings and Recommendation	Corrective Action / Comments	Timing
<b>Opportunity for Improvement -02</b>	" 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 compliance@planning.nsw.gov.au within seven days after they identify any non-compliance."	"The Second Independent Environmental Audit Report dated 17/12/2019 (Final) noted 2 Non-conformances (NCs). However, notification to DPIE with regards to these NCs was not conducted within 7 days. Due to the holiday break the notification to DPIE was missed. However, the Final Audit Report was submitted to DPIE in February 2020 with the appropriate response to address the non-compliances.  A non-compliance was not raised in this audit since the Final Audit Report was already submitted to DPIE as a form or notification. Instead an opportunity for improvement was raised by the auditors to ensure future submissions and notifications to DPIE are conducted as per the required timeframes. "	"This was previously noted in CCR2. As a result an in-depth review of all Conditions with time requirements around notification had already been undertaken by CPB to prevent any future non-conformances.  IAR and Response to IAR are to be submitted within 7 days of the audit being submitted AFC where non-compliances are noted. "	The review of all conditions with time requirements around notification was carried out in May 2020 to ensure that all notifications to the DPIE are conducted within the time frame required by the SSD Conditions.

**Conclusion:**

Based on HI's review of the audit the results from the Independent Audit were satisfactory and in accordance with conditions set out by the SSDA Planning Consent.

Please contact the undersigned if you require further information.

Yours sincerely



Adrian Timp  
**Senior Project Director**  
**Health Infrastructure NSW**