

Prepared for John Holland Group

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# **Independent Environmental Audit**

**Shoalhaven Hospital Redevelopment – SSD 35999468  
– Audit 4**

January 2025

Project Number: 230085

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## Document verification

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## Acronyms and abbreviations

CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Sub-plan
CoC	Conditions of Consent
CTPMSP	Construction Traffic and Pedestrian Management Sub-plan
CWMP	Construction Waste Management Sub-plan
DPE	Department of Planning and Environment (NSW)
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment (NSW)
EIS	Environmental impact statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
IEA	Independent Environmental Audit
EIS	Environmental Impact Statement
JHG	John Holland Group
LALC	Local Aboriginal Land Council
MOD	Modification to Conditions of Consent
NGH	NGH Pty Ltd
NSW	New South Wales
PHA	Preliminary Hazard Analysis
SSD	State Significant Development
TfNSW	Transport for NSW

## Executive summary

NGH Pty Ltd (NGH) was engaged by John Holland Group (JHG) to undertake an Independent Environmental Audit (IEA) of the Shoalhaven Hospital Redevelopment (the redevelopment). The redevelopment is located on Scenic Drive in Nowra, New South Wales (NSW).

A development application and accompanying Environmental Impact Statement (EIS) for the project was submitted to the NSW Department of Planning and Environment (DPE) (now referred to Department of Planning, Housing and Infrastructure; DPHI) and State Significant Development (SSD) consent for the redevelopment was approved by the DPE on 5 April 2023 (SSD 35999468). Consolidated conditions of consent were issued to JHG by DPE on 8 June 2023.

NGH undertook the first initial audit for the period from construction commencement until 3<sup>rd</sup> August 2023. The audit found five (5) non-compliances from a total of 158 Conditions of Approval. The document review found that Environmental Management Plans and sub plans are relevant to the site and are generally being implemented. The second audit for the period of 4 August 2023 to 1 February 2024 found nine (9) non-compliances from a total of 158 Conditions of Approval. The third audit for the period of 2 February 2024 to 25 July 2024 found three (3) new non-compliances from a total of 158 Conditions of Approval.

This report is for the third audit for the period of 26 July 2024 to 16 January 2025. The audit scope was developed by reviewing the MOD 4 Consolidated Consent (SSD-35999468) and the Independent Audit Post Approval Requirements (2020). The audit consisted of desktop document review undertake offsite, onsite document review, site inspection and interviews. The offsite document review was undertaken mostly prior to the site component of the audit with further request for information following the site inspection.

This fourth audit found no (0) non-compliant findings from a total of 158 Conditions of Approval and no reportable environmental incidents.

Complaints received over the auditing period included two noise complaints, one parking complaint and one complaint raising concerns about plumbing issues at a residence. Three of the complaints were actively investigated and were reported to have been addressed to the satisfaction of the nearby residents. One complaint made in the week before the audit inspection was still actively being addressed in an adequate manner.

Site interviews occurred with the Senior Project Engineer, Environmental Advisor and Safety Manager during the course of the audit site inspection. The interviews found that these key staff members had a strong understanding the requirements of the environmental management plans and requisite implementation of same.

One **Improvement Opportunity** was identified as follows:

- The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) and associated drawings need to be reviewed and updated to provide consistent identification of access gates, as per current site access arrangements.

The key strength of this project is accessibility of compliance documentation, and an ongoing commitment and willingness to improve environmental management mitigation measures onsite. This is highlighted by the outcome of this audit with no non-compliant findings.

# 1. Introduction

NGH Pty Ltd (NGH) was engaged by John Holland Group (JHG) to undertake the fourth Independent Environmental Audit (IEA) of the Shoalhaven Hospital Redevelopment (the redevelopment). The redevelopment is located on Scenic Drive in Nowra, New South Wales (NSW). The purpose of the audit was to satisfy the Department of Planning, Housing and Infrastructure (DPHI) Conditions of Consent (CoC) for State Significant Development (SSD) 35999468, inclusive of Modifications (MOD) 1, MOD 2, MOD 3 and MOD 4.

The CoC requires that an initial IEA is undertaken within 12 weeks of construction commencement, which was undertaken by NGH in August 2023 and then within 26-weekly intervals, for the duration of construction.

## 1.1. Background

A development application and accompanying Environmental Impact Statement (EIS) for the project was submitted to the NSW DPHI (former DPE) and SSD consent for the redevelopment was approved by the DPHI on 5 April 2023 (SSD 35999468). Following this, a modification to SSD 35999468 (MOD 1) was requested and subsequently approved by the DPHI to allow for the re-numbering of condition B30. Consolidated conditions of consent were issued to JHG by DPHI on 8 June 2023. Additional modifications to SSD 35999468 were requested and subsequently approved by the DPHI to:

- MOD 1 – Re-numbering of condition B30
- MOD 2 - allow the removal of inconsistencies between conditions relating to the rainwater tank capacity.
- MOD 3 – Helipad Operations – condition B15 re-numbering
- MOD 4 – Façade Changes

Consolidated conditions of consent for MOD 4 were issued to JHG by DPHI on 22 March 2024 and were current at the time of this fourth audit.

## 1.2. Purpose

The audit period considered in this IEA is 26 July 2024 to 16 January 2024 (within 26 weeks from previous IEA). The audit has:

- (a) been conducted by a suitably qualified, experienced and independent team of experts, whose appointment has been endorsed by the Secretary;
- (b) included consultation with the relevant agencies;
- (c) assessed the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other plan or program required under these approvals;
- (d) reviewed the adequacy of any approved strategy, plan or program required under the abovementioned consents; and

(e) recommended measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.

Within two (2) months of undertaking the independent audit site inspection, unless otherwise agreed by the Planning Secretary, the Applicant shall submit a copy of the Independent Audit Report and the Applicant's response to audit findings to the Planning Secretary.

### **1.3. Audit objectives**

The objective of this fourth Independent Audit was to assess compliance with Consolidated Conditions of Consent (referred to hereafter as Consolidated Consent) and implementation of applicable management plans.

### **1.4. Audit scope and period**

The scope of the audit included:

- An assessment of compliance of all the conditions of consent relevant to the works at the time of the audit (as detailed in Appendix A);
- An assessment of the adequacy and implementation of the site environmental management plans including:
  - B17 - Construction Environmental Management Plan (CEMP)
  - B18 - Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)
  - B19 - Construction Noise and Vibration Management Sub-Plan (CNVMP)
  - B20 - Construction Waste Management Sub-Plan (CWMP).
- An assessment of performance of the project in relation to implementation of environmental plans; and
- An assessment of the actual impacts compared to predicted impacts, as documented in the environmental impact assessment.

The audit scope was developed by reviewing the Consolidated Consent (SSD-35999468) and the Independent Audit Post Approval Requirements (2020).

The audit period covered construction between 26 July 2024 to the date of the site visit on the 16 January 2025.

### **1.5. Limitations**

The outcomes of this audit are based on the assessment that has been undertaken in accordance with the contracted scope of work and is subject to the applicable time and other constraints. The assessment included a review of documentation, interviews with personnel and observations made during the site inspection.

The outcomes presented in this audit report are based on the assessment undertaken and relied on supplied information. NGH does not accept responsibility for any inaccurate information or omissions in the supplied information.

This report does not constitute legal advice in relation to environmental liabilities.



## 2. Audit methodology

The audit comprised desktop document review, site inspection and onsite document review, and off- site analysis and reporting. An audit plan was provided to the auditee prior to the site audit detailing the timing of the audit and requirements regarding accessing the site and documentation (refer Appendix B). These components are further expanded below.

### 2.1. Selection of audit team

John Holland Group nominated Natascha Arens as the Lead Independent Auditor and Will Weir as the Assistant Auditor for this project and provided CVs and independence declarations to DPE, signed on 12 December 2024 (refer Appendix A). Natascha and Will were approved by DPE as the Independent Audit team on the 9 January 2025 (refer Appendix D).

The audit team comprised these members:

- Natascha Arens – Lead Auditor
- Will Weir – Assistant Auditor (Site)

### 2.2. Compliance evaluation

The audit consisted of desktop document review undertaken offsite, onsite document review, site inspection and interviews. The offsite document review was undertaken prior to the site component of the audit with further request for information following the site inspection.

The site inspection component of the audit was conducted 16 January 2025 and included:

- Opening meeting to introduce all parties and discuss the scope and objectives of the audit
- Document and records review to check compliance with conditions
- Interviews with site personnel
- Site inspection
- Closing meeting to summarise the preliminary findings of the site audit and to discuss additional audit evidence required.

The document review included a review of the Conditions of Approval relevant to the stage of works of the Project and all management plans and sub plans (Appendix A).

The Opening Meeting was held on 16 January 2025 at 8:00am.

Present at the opening meeting were:

- Richard Ingall (Senior Project Engineer, JHG)
- Ron O'Neill (Safety Manager, JHG)
- Emily Delovska (Safety Coordinator, JHG)
- David Wood (Project Manager Johnstaff)
- Will Weir (Auditor, NGH).

A site inspection debrief was held at site and a Closing Meeting 16 January 2025 at 2:00pm.

Present at the Closing Meeting were:

- Richard Ingall (Senior Project Engineer, JHG)

- Rhys Callum (Project Manager, JHG)
- Emily Delovska (Safety Coordinator, JHG)
- David Wood (Project Manager Johnstaff)
- Will Weir (Auditor, NGH).

Document review occurred throughout the day and offsite until report completion.

## 2.3. Site interviews

Interviews with staff were undertaken throughout the course of the site audit (16 January 2025) to gather evidence during offsite document review including:

- Richard Ingall (Senior Project Engineer, JHG)
- Ron O'Neill (Safety Manager, JHG)
- Rhys Callum (Project Manager, JHG)

## 2.4. Consultation

As part of the audit NGH and JHG consulted with the DPE, to ascertain if there were any specific environmental issues that should be investigated during the IEA. Relevant regulatory stakeholders were also contacted, those approached were Departments required to be consulted or to review and approve management plans required in the conditions of consent for the site. Specifically:

- DPHI
- Transport for New South Wales (TfNSW)
- Shoalhaven City Council
- NSW Biodiversity, Conservation and Science (BCS), Department of Climate Change, Energy, the Environment and Water)
- Nowra Local Aboriginal Land Council (LALC).

Email responses from the consultation process are included in Appendix E and summarised in Section 3.7.

## 2.5. Compliance status descriptors

The compliance status descriptors from DPIE (2020) have been used to assess compliance for this audit.

Table 2-1: Compliance status descriptors

Status	Description
<b>Compliant (C)</b>	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.
<b>Non-compliant (NC)</b>	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.
<b>Not triggered (NT)</b>	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.

### **3. Audit findings**

The following documents were reviewed to check compliance with conditions or for implementation of plans. The documents relevant to this audit included:

#### **Design plans and Approval documentation**

- Consolidated Consent SSD-35999468

#### **Correspondence and Information**

- John Holland - Notification Letter, dated 3/05/23
- Aconex Transmittal 22/05/2023 - CC1 Documentation for submission to Planning Secretary
- Aconex Transmittal 26/05/2023 - CC1 Documentation for submission to Planning Secretary
- John Holland - Notification Letter dated 31/05/23
- DPE Letter re; B2, dated 7 July 2023
- Evidence of staging report issue -email dated 8 February 2023 4:23:00 PM
- <https://shoalhavenredevelopment.health.nsw.gov.au/>
- <https://www.hinfra.health.nsw.gov.au/projects/project-search/shoalhaven-district-memorial-hospital-redevelopment>
- Shoalhaven Hospital - Re-development Project Induction
- Email - Shoalhaven Hospital Redevelopment - TPG Fibre relocation, dated 16/05/2023
- Jacobs consultation correspondence - Gas, Electrical and Water consultation documents
- Letter - Project reference: SHOALHAVEN HOSPITAL, Job No: 130247, DIPAPIDATION REPORTS EXTENT
- Letter - Statement of Compliance to ESD SSDA Conditions, Ref. No. 207163, day May 5th, 2023
- Letter - Statement of Compliance Shoalhaven Hospital Demolition Work Plan, dated 14th May 2023
- Shoalhaven District Memorial Hospital Redevelopment Construction Worker Parking Confirmation for Work Phase CC2, dated 6 July 2023
- Shoalhaven Hospital Redevelopment Complaints Register
- Letter - Shoalhaven Hospital Redevelopment (SSD 35999468) Independent Auditor 2023 - DPE, dated 27/07/2023
- Post approval DPE Non-compliance notification for first Independent Audit
- John Holland - Notification Letter, dated 3.05.23
- John Holland - Notification Letter dated 18/09/23
- John Holland - Notification Letter dated 06/11/23
- Letter - Shoalhaven Hospital Redevelopment (SSD 35999468) Independent Auditor 2023 - DPE, dated 20/12/2023
- Independent Audit Initial Audit- Proponent Review and Response, 27 September 2023
- John Holland - Notification Letter to Neighbours dated 15 November 2023
- John Holland - Notification Letter to DPE dated 14 November 2023
- Letter to Department - Condition B4 – External Walls and Cladding, dated 17 June 2024
- Letter to Department dated 28 Marh 2024 - Revision of Strategies and Plans, and Post Approval Form.
- Letter to Department, 14 December 2023 - Notice of commencement - Stage 5
- Letter to Department, 12 April 2024 - Notice of commencement - Stage 6
- Letter to Department, 20 May 2024 - Notice of commencement - Stage 7
- Template Letter - neighbourhood drop for out of hours concrete finishing work.
- Letter to Department, 26 September 2024 – Notification of Non-compliance.

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- Letter - SSD-35999468 Shoalhaven Hospital, Revisions of Strategies, Plans and Programs, dated 2 October 2024
- JH-TRANSMIT-003308 – CEMP
- Work Notice - UPDATED: Further demolition work on hospital site – Notice of Potential Noise, 6 January 2025
- Email - Noise Complaint, dated 9 January 2025
- Letter - Shoalhaven Hospital Redevelopment (SSD 35999468) - Independent Auditor Approval January 2025 - DPE, dated 09/01/2025

## **Reports and plans**

- Shoalhaven Hospital Redevelopment SDMH - Staging Report - SSD-35999468, dated 15 January 2024
- SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, Rev G dated 18 April 2024
- Shoalhaven District Memorial Hospital DILAPIDATION REPORT, 21 February 2023
- Construction Environmental Management Plan (CEMP) rev 02, dated 22 September 2023
- Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), prepared by TTW, dated 10 May 2023
- Construction Noise and Vibration Management Sub-Plan (CNVMSP) prepared by Acoustic Logic (2 May 2023), Rev 0
- Construction Waste Management Plan (CWMP), Rev 01, dated 18/05/2023
- Construction Waste Management Plan (CWMP), Rev 00, dated 03/05/2023
- Aboriginal Cultural Heritage Assessment Report (ACHAR), dated 27 June 2022
- EIS
- Shoalhaven District Memorial Hospital Landing Site Design Development Report (AviPro), dated 9 September 2023
- Ground Water Management Plan, Rev 0.1, dated 1 September 2023
- Dust, Noise and Vibration Monitoring Reports for three months in 2024 as held on HI Website.
- Erosion and Sediment Control Background and General Instructions, SEEK, Rev OO 4/07/2023 (ESCP)
- Monthly Dust, Noise and Vibration Monitoring Reports July - Dec 2024.
- Newsletters for July, October and December 2024
- News posted for October, November and December 2024
- Construction Environmental Management Plan (CEMP) rev 04, dated 17 December 2024
- Erosion and Sediment Control Plan (SEEC, Rev 02, dated 25/09/2024)
- Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), Rev 02 prepared by TTW, dated 20 September 2024
- JH-TRANSMIT-003405 - SWEPT PATH, SIGNAGE AND LINEMARKING, TRAFFIC DESIGN REPORT DRAWINGS (x26)
- PRJ001422-ACM001 - Asbestos Materials Clearance Inspection Report, Property Risk Australia Pty Ltd, 20 September 2024

## **Design certification, record, monitoring and Inspections**

- BCA Crown Certificate - 1 (CC1), CRO-23037, 30 May 2023
- BCA Crown Certificate - 2 (CC2), CRO-23063 (CC1), 24 July 2023
- BCA Crown Certificate - 3 (CC3), CRO-23083, 23 October 2023
- BCA Crown Certificate - 4 (CC4), CRO-23097, 29 November 2023
- BCA Crown Certificate - 5 (CC5), CRO-23118, 16 January 2024
- BCA Crown Certificate - 6 (CC6), CRO-24056, 12 June 2024

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- BCA Crown Certificate - 7 (CC7), CRO-24042, 23 May 2024
- Statement of Compliance Erosion and Sediment Control, Delta Pty Ltd, dated 14 May 2023
- Shoalhaven City Council - Consent for Works and/or Structures in a Public Road - Temporary Site Access Only, 3rd May 2023
- CIVIL DESIGN CERTIFICATE - CC2 – Bulk Excavation, 6 July 2023
- Design Certificate – Civil / Stormwater, 21 July 2023
- May to July 2023 JHG Nowra (002) - Waste Tracking Spreadsheet
- August to December 2023 JHG Nowra - Waste Tracking Spreadsheet
- SDMH - Material Tracking Register
- Contractor Compliance Statement, AviPro, 16 November 2023
- Shoalhaven Hospital Redevelopment Dust Monitoring Report 7, 21 December 2023
- Shoalhaven Hospital Redevelopment Noise and Vibration Monitoring Report 7, 21 December 2023
- Asbestos Monitoring Register
- CIVIL DESIGN CERTIFICATE – CC3 – Piling and Concrete footings and inground services (Stormwater), 11 September 2023
- Orange Bins monthly waste tracking reports for July 2024 to December 2024

### 3.1. Compliance performance

The audit found no (0) non-compliant findings from a total of 158 Conditions of Approval. No old compliance findings related to not meeting specified dates have been carried forward.

Table 3-1 Statutory instrument (Conditions of Consent 35999468) audit classification status

Condition Part	Compliant	Non-Compliances	Not triggered
Part A (31)	26	0	5
Part B (39)	32	0	7
Part C (41)	32	0	9
Part D (29)	0	0	18
Part E (18)	0	0	18

Note: In relation to the tally above whole conditions of consent have been used to generate the tally. i.e. where a condition contains part a), b), c) etc this has been counted as one condition.

The document review found that Environmental Management Plans and sub plans are relevant to the site and are generally being implemented (refer Section 3.5 below for more detail on management plan implementation).

### 3.2. Summary of agency notices, orders, penalties or prosecutions

There were no agency notices, orders, penalty notices or prosecutions within the audit period at the time of reporting.



### **3.3. Non-compliances**

No (0) non-compliant findings were raised in this audit against the conditions of consent (SSD-35999468).

### **3.4. Previous audit recommendations**

The third audit identified a total of eight non-compliant findings listed below with their status at the time of the fourth audit:

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Table 3-2 Consolidated Consent 35999468, summary of non-compliances from previous audit

NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
<b>Part A</b>					
NC1	A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	Non-compliant findings were recorded (as below). As such, the development was found to not have been carried out in compliance with all the conditions of this consent.	NC	Completion of all actions listed below <b>(Closed)</b>
NC2	A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation.	Refer conditions A2, A23, B24, C9, C21, C22 and C32 where the third audit found administrative and physical non-compliance findings with prescribed conditions of development consent. Therefore, compliance has not been achieved with all conditions of consent as required by Section 78 under Part 4, Division 2 of the EP&A Regulation.	NC	Completion of all actions listed below <b>(Closed)</b>
NC3	A23	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, approved or provided)	The Health Infrastructure website provides a link to "Key documents" held on the Project website where a further link titled "SSD Planning Portal" provided to the NSW Major Projects website.  The requirements listed A23 (a) (i), (ii), (iii), (iv), (v), (vi), (vii) and (viii) and (ix) are provided on the Website. However, only 3 months of Noise, Vibration and Dust monitoring are provided.  The latest revision number of the Waste Management	NC	The Project Website was updated with all relevant documents and information at the time of the fourth audit. <b>(Closed)</b>

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NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
		<p>publicly available on its website:</p> <p>(i) documents referred to in condition A2 of this consent.</p> <p>(ii) all current statutory approvals for the development.</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent</p> <p>(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent</p> <p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs</p> <p>(vi) a summary of the current stage and progress of the</p>	<p>Plan (Rev 01, date 18/05/2023) was not on the Key Documents website at the time of the audit.</p>		

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NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
		<p>development;</p> <p>(vii) contact details to enquire about the development or to make a complaint</p> <p>(viii) a complaints register, updated monthly</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.</p>			
<b>Part B</b>					
NC4	B24	Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban	The site inspection for this third audit identified that erosion and sediment controls in the southwestern area of the site in the vicinity of the disturbed temporary access track were not adequately installed. A small discharge of concrete wash-out was observed beyond the site boundary in this area. The road verges along Shoalhaven	NC	The Erosion and Sediment Control Plan was updated after the last audit and was observed to be adequately implemented at the time of the fourth audit inspection, including response to significant rainfall event that occurred

NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
		Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.	Street are highly disturbed by construction activities, noting efforts have been made to achieve drainage back toward the site, however this area requires further attention to stabilise the soils and where necessary include temporary controls. As noted above, sediment controls are installed around the Shoalhaven Street stormwater pits, however in one instance this was observed to have been impacted by a parked vehicle.		on the evening prior. <b>(Closed)</b>
<b>Part C</b>					
NC5	C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	At the time of the third audit inspection the temporary access track near the corner of North Street / Shoalhaven was continuing to be used to access the construction site, including heavy plant and equipment. Section 3.2.1 of the CTPMSP stipulates that this temporary access track was for the purpose of construction the site office compound only and was to discontinue use in August 2023.  Refer B24 and C22 regarding ESC non-compliance at this location.	NC	The CTPMSP was updated since the previous audit to include limited ongoing use of the access track only. <b>(Closed)</b>
NC6	C21	During construction, the Applicant must ensure that: (a) activities are carried out in a	Some light and heavy vehicles have been accessing site via the temporary access in the southeast corner of the site. There was no rumble grid in place at this location	NC	As above and below. <b>(Closed)</b>



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NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
		<p>manner that minimises dust including emission of windblown or traffic generated dust;</p> <p>(b) all trucks entering or leaving the site with loads have their loads covered;</p> <p>(c) trucks associated with the development do not track dirt onto the public road network;</p> <p>(d) public roads used by these trucks are kept clean; and</p> <p>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</p>	<p>and dirt was evidently tracking onto the street.</p> <p>Refer C22 below in relation to disturbed areas in the southeastern corner of the site and the verge along Shoalhaven Street. These areas have not been progressively stabilised in accordance with C21 (e).</p>		
NC7	C22	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works, shall have regard to potential flooding and until such time as all ground disturbed by	<p>The site inspection for Audit 3 identified that erosion and sediment controls in the southwestern area of the site in the vicinity of the disturbed temporary access track were not adequately installed. The ESCP identifies this area as a no go zone for no ground disturbance. A small discharge of concrete wash-out was also observed beyond the site boundary in this area.</p> <p>The road verge along Shoalhaven Street is highly</p>	NC	<p>The ESCP was updated following the previous audit and was adequately being implemented at the time to the fourth audit inspection.</p> <p><b>(Closed)</b></p>

## Independent Environmental Audit

Shoalhaven Hospital Redevelopment – SSD 35999468 – Audit 4



NC#	#	Assessment requirement	Comment	Audit classification	Response/ Action
		the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	<p>disturbed by construction activities, noting efforts have been made to achieve drainage back toward the site, however this area requires further attention to stabilise the soils and where necessary include temporary controls.</p> <p>The ESCP does not adequately address controls for these areas.</p> <p>Sediment controls are installed around the Shoalhaven Street stormwater pits, however in one instance this control had been impacted by a parked vehicle.</p>		
NC8	C32	The Applicant must ensure that concrete waste and rinse water is prevented from entering any natural or artificial watercourse.	A small discharge of concrete wash-out was observed beyond the site boundary in the southeast corner of the site. While it was not clear if the washout had reached the Shoalhaven Street drain, there was a lack of adequate controls in place to prevent discharge off-site.	NC	<p>Adequate controls are in place to prevent discharge of concrete washout off-site.</p> <p><b>(Closed)</b></p>

### 3.5. Environmental plans, subplans and post approval documents

A summary of the implementation of key management plans required under Consolidated Consent 35999468 relevant to the current (construction-phase) stage of works are provided below:

- B17 - Construction Environmental Management Plan (CEMP)
- B18 - Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)
- B19 - Construction Noise and Vibration Management Sub-Plan (CNVMP)
- B20 - Construction Waste Management Sub-Plan (CWMP).

#### 3.5.1. Construction Environmental Management Plan, Schedule B, Condition 17

The audit found that the requirements of the CEMP were generally being implemented as was evident during the third audit site inspection, and compliance with the CEMP was observed to be checked via regular site inspections. The audit found that actions were being tracked through to close out.

At the time of the third audit site inspection the following works activities were being undertaken:

- Superstructure (Level L7)
- Internal Fitout and Services
- Deliveries of materials, plant and equipment
- BOC Gas facility (operational – not yet handed over)

#### 3.5.2. Construction Traffic and Pedestrian Management Sub-Plan, Schedule B, Condition 18

The mitigation measures identified within the CTPMSP were observed as generally being upheld across the site during the audit site inspection.

Section 3.2.3 of the CTPMSP incorrectly describes the configuration of access gates in relation to the current site conditions, and as is presented in Figure 3.3 of the CTPMSP. This is assumed by the auditor to be a typographical error either in the text or Figure 3.3 as the site is operating with the intent of the layout and as described. It is also noted that the Swept Path Analysis plans provided with the CTPMSP (see Drawing No. TTR11Z009, TTR11Z010 and TTR11Z011) are not aligned with the arrangements (gate numbers) presented in Figure 3.3. Gate 2 was observed to have signage aligned with Figure 3.3. This is seen as an opportunity for improvement by the auditor as the general intent of traffic arrangements are presented in Figure 3.3 and these were being implemented at the time of the fourth audit inspection.

JHG has maintained additional off-street parking to meet allow for the large number of employees onsite.

#### 3.5.3. Construction Noise and Vibration Management Sub-Plan, Schedule B, Condition 19

The mitigation measures proposed in the CNVMP were observed to be implemented during the audit site inspection, including:

- Reversing 'quackers' and all on-site plant
- Well maintained plant and equipment
- Noise barrier hoarding

- Monitoring stations
- Works within nominated operating hours (generally)

Two noise complaints were received in the fourth audit reporting period that had/were being addressed adequately. Noise records report that noise levels were typically below the Highly Noise Affected Management Level. This will need to be confirmed for early January 2025 with regard to a complaint raised just prior to the audit inspection, and still under investigation and response at that time.

Notably, from the commencement of construction there have been very few complaints received for noise and/or vibration. Monitoring data reviewed generally indicate that the Project is adhering to requisite noise levels.

#### **3.5.4. Construction Waste Management Sub-Plan, Schedule B, Condition 20**

Adequate waste segregation and storage was observed during the audit site inspection. Waste materials are appropriately classified and tracked for proper disposal to a licensed sorting facility as required. The facility then manages the sorted material for on-selling, beneficial reuse or disposal to landfill (minimal amounts). Further detail is provided in the audit finding for condition of approval C33.

A chance find of potential asbestos containing material was appropriately assessed and managed in accordance with the Waste Management Sub-plan and condition of approval C31.

#### **3.5.5. Site Inspections, incidents and other records**

The audit found that regular environmental inspections were being carried out for the audit period. There was evidence that actions were being tracked through to close out.

There were no reportable environmental incidents for the audit period.

#### **3.5.6. Stakeholder, community engagement and complaints**

The Health Infrastructure – Shoalhaven Hospital Redevelopment website (<https://shoalhavenredevelopment.health.nsw.gov.au/>) is the key location for the community to access information on the Project with contact details also found on the website. The website contains up-to-date community fact sheets and news items in relation to the progress of the development.

Much of the information required to be published on the website (refer condition A23) was present on this website at the time of third audit inspection. The information has been presented on Health Infrastructure Project website (<https://www.hinfra.health.nsw.gov.au/projects/project-search/shoalhaven-district-memorial-hospital-redevelopment>) under Key Documents with a link also the information on the Major Project portal.

The relatively low number of complaints received over the life of the Project have been adequately recorded and responded to closure, with the exception of the recent noise complaint which was still open at the time of the audit. The Project actively informs the local residents of specific work activities via letter box drops.

### **3.6. Environmental performance**

Environmental performance was largely measured by regular environmental inspections. The regular inspections showed a consistent trend of sound environmental management practice with nil reportable

environmental incidents or complaints for the audit period. The audit found that environmental inspections were occurring.

The recent efforts to update the Erosion and Sediment Control Plan and implement same was evident at the time of the fourth audit inspection. Further consideration should be given to stabilisation along Shoalhaven Street as soon as practicable (ie. when no longer subject to Project traffic).

No observations made during the second audit inspection raised concern for the potential to cause environmental harm.

### 3.7. Consultation outcome

Relevant regulatory stakeholders were contacted and those approached were Departments required to be consulted or to review and approve management plans required in the conditions of consent for the site (refer Appendix E). Specifically:

Consultation was initiated in May 2024 during the preparatory phase of the IEA with DPHI, TfNSW Shoalhaven City Council, BCD and LALC prior to the site inspection to obtain feedback and draw attention to any key issues, within the agreed scope of the audit (i.e. Consolidated Consent SSD-35999468). In each case an email was sent to representatives of each agency requesting feedback on those issues considered most relevant by their department at the time of the audit. At the time of reporting, responses had been received from all Departments approached with the exception of the Nowra LALC and Shoalhaven City Council, as below:

- Transport for New South Wales (TfNSW):
  - There are no specific compliance issues relevant to the development that TfNSW would like NGH to focus on at this time.
  - Advice has been previously provided by TfNSW on the draft Construction Traffic & Pedestrian Management Sub-Plan (CTPMSP) as required by Condition B18. The audit should ensure the requirements of this plan are being complied with during construction.
  - Discussions directly with the TfNSW Demand Management Team should occur sooner rather than later to ensure there are no delays in the latter sections of the project/required post-consent approvals noting that the Green Travel Plan has to be prepared to the satisfaction of the TfNSW Travel Demand Management Team (as required by Condition D18).
  - Separate consultation should be had with Shoalhaven City Council.
  - **IEA response:** The redevelopment was noted as compliant with condition of approval B18 at the time of audit, with Consent Conditions relevant to management regarding traffic and parking. The CTPMSP needs to be reviewed and updated to align access gate naming throughout.
  - Discussions with the TfNSW Demand Management Team should occur to ensure there are no delays in the latter sections of the project/required post-consent approvals noting that the Green Travel Plan has to be prepared to the satisfaction of the TfNSW Travel Demand Management Team (as required by Condition D18).
  - Separate consultation was undertaken with Shoalhaven City Council (refer below)
- Shoalhaven City Council.
  - Compliance against all relevant conditions of consent
  - Compliance in all aspects of site controls to prevent, types of construction pollution (air, water, noise and soil pollution).



- Adherence to tree protection zones and/or structural root zones should be included in the audit.
- Dilapidation and adverse impacts on Councils infrastructure.
- **IEA response** – all matters above addressed by this IEA against relevant conditions of approval and management plans as documented in this report for the current audit period. A review of the known and recorded noise and parking complaints indicated that either had, or in the case of a recent noise complaint were being adequately addressed.
- Department of Planning and Environment (DPE):
  - In addition to the consent requirements, please review the management of noise, dust, operating hours, truck movements, erosion and sediment, including dirt tracking onto public roads, community consultation and complaints management.
  - **IEA response:** all matters above address by IEA against relevant conditions of approval and implementation of management plans as documented in this report for the current audit period. The priority areas to be addressed are considered to be (noting no non-compliant findings):
    - Review and update the CTPMSP to align naming of access gates throughout.
    - Further stabilise the remaining verge areas along Shoalhaven Street as soon as practicable.
- Nowra LALC
  - No response
- Biodiversity Conservation Division (BCD):
  - No response
  - Previously indicated that - No specific environmental issues that BCD would like the audit to focus on at this time (Audit 2).

### 3.8. Complaints

A review of the Complaints Registers found that there had been three complaints recorded in the audit period, including:

- One complaint raised about construction traffic parking in the incorrect carpark, along with a working smoking in the carpark (a designated no-smoking area).
- A neighbouring property raised concerns about an issue with the plumbing at their property.
- One noise complaint from a resident on Clyer Avenue in relation to “load scraping noises” from the Project site.

These complaints were actively investigated and were reported to have been addressed to the satisfaction of the complainants.

The auditor was also advised about a complaint in the week preceding the audit and provided information for what was still and open investigation/response (refer condition of approval C13). The complaint was adequately in the process of being addressed at the time of the fourth audit and the outcome should be considered in the fifth audit.

### 3.9. Incidents

There were no reportable environmental incidents for the audit period.

### 3.10. Actual versus predicted impacts

The Shoalhaven Hospital Redevelopment Environmental Impact Statement (EIS) provides an assessment of the environmental impacts of the Project. In general terms, the actual environmental impact from the Project for the audit period is consistent with that predicted in the EIS. It is noted that air quality and noise monitoring are only required if necessary to verify a community complaint, however, is continuously monitored.

### 3.11. Site inspection

The site inspection found the site to be generally well managed. Key environmental controls appeared well maintained:

- Waste management including waste separation and appropriate disposal of waste
- Waste oil disposal is adequate
- Spill kits adequately stocked and sufficiently placed
- Plant and Equipment inspection and maintenance regime was being adhered to
- Clearly delineated site boundaries and No-Go zones
- All requisite hording installed and in good condition
- Monitoring equipment in place and operational
- Tree Protection Zones established and continue to be maintained
- Erosion and Sediment Controls in place, including temporary controls in response to a significant rainfall event in the evening before the fourth audit site inspection.

Representative site photographs are provided in Appendix F.

### 3.12. Site Interviews

Site interviews occurred with the Senior Project Engineer, Environmental Advisor and Safety Manager during the course of the audit site inspection. The interviews found that these key staff members had a strong understanding the requirements of the environmental management plans and requisite implementation of same.

### 3.13. Improvement opportunities

The audit found that John Holland Group exhibits sound environmental management practices. The site appeared to be generally well managed at the time of the fourth audit inspection.

Erosion and sediment controls had been improved greatly since the previous audit. This should remain a focus of ongoing environmental management for the remainder of the project, including stabilisation of disturbed areas as soon as practicable (ie. once construction traffic ceases in those areas).

One new **Improvement Opportunity** was identified as follows:

- The CTPMSP needs to be reviewed and updated to accurately align access gate naming throughout this document and associated drawings.

### **3.14. Key Strengths**

The key strength of this project is accessibility of compliance documentation and a continued commitment and willingness to improve environmental management mitigation measures onsite. This is evident by improvements made in relation to erosion and sediment control, and as there were no new non-compliant findings for the fourth audit.

As the development progresses, management attention should continue to be maintained with regard to housekeeping, waste management and storage of hazardous chemicals.

## 4. Recommendations

Section 3.3 above includes one opportunity for improvement regarding the CTMSP.

### 4.1. Summary of non-compliance and compliance against conditions

No non-compliant findings were raised for the current audit period against Consent conditions (SSD 35999468). Overall, compliance was achieved with the audit documents that were reviewed and with implementation of requisite plans and mitigation measures on-site.

## 5. Conclusion

The audit found no (0) new non-compliant findings with the Conditions of Consent. The document review found that Environmental Management Plans and sub plans are relevant to the site and are generally being implemented. The updated CTPMSP plan needs to be reviewed and updated to align access gate naming throughout the plan. However, the site access arrangements are generally in alignment with the intent of the plan.



## Appendix A Audit Table

## Development Consent Compliance Status

Reference	Approval or licence requirement	Evidence collected	Audit #4 Finding	Compliance status	Action Reference
Development Consent (SSD 35999468)					
Schedule 2					
PART A - Administrative Conditions					
A1	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.	Site Inspection  Interview: R Ingall		Compliant	
	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS and Response to Submissions;</p>	<p>Site inspection</p> <p>Document review</p> <p>Interview: R Ingall</p> <p>Site inspection</p> <p>Interview - R Ingall, R Collum</p> <p>Document review</p> <p>ENVIRONMENTAL IMPACT STATEMENT - Shoalhaven Hospital Redevelopment (SSD 35999468), HI September 2022, including Appendix EE - Proposed Mitigation Measures</p>	<p>No non-compliant findings were recorded for the Audit #4 period. As such, the development was found to have been carried out in compliance with all the relevant and triggered conditions of this consent.</p> <p>At the time of fourth audit, no such written directions had been received.</p> <p>The project was being undertaken generally in accordance with the EIS and Response to Submission at the time of the fourth audit.</p>	Compliant	
	(d) in accordance with the approved plans in the table below:	BCA Crown Certificate - 5 (CC5), CRO-23118, 16 January 2024	Works were being delivered in accordance with the relevant approved plans at the time of the fourth audit.		

A2

Architectural Plans prepared by Conrad Gargett			
Dwg No.	Rev	Name of Plan	Date
PRJ-TD-DR-AR-SK00003	2	Proposed Site Plan	02/09/22
RJ-TD-DR-AR-SK00002	2	Public Place Proposed Site Plan	02/09/22
PRJ-TD-DR-AR-00005	5	Site Demolition	26/08/22
ASB-TD-DR-AR-SK00004	2	Level 0 Overall Plan	10/11/22
ASB-TD-DR-AR-SK00005	2	Level 1 Overall Plan	10/11/22
ASB-TD-DR-AR-SK00006	1	Level 2 Overall Plan	02/09/22
ASB-TD-DR-AR-SK00007	1	Level 2 Link Plan	02/09/22
ASB-TD-DR-AR-SK00008	2	Level 3 Overall Plan	21/09/22
ASB-TD-DR-AR-SK00009	2	Level 4 Overall Plan	21/09/22
ASB-TD-DR-AR-SK00010	2	Level 5 Overall Plan	21/09/22
ASB-TD-DR-AR-SK00011	1	Level 6 Overall Plan	02/09/22
ASB-TD-DR-AR-SK00012	1	Level 7 Overall Plan	02/09/22
ASB-TD-DR-AR-SK00013	1	Level 8 Overall Plan	02/09/22
ASB-TD-DR-AR-SK00014	2	Detailed External Elevation – North Part 1	Undated/ Date 55
ASB-TD-DR-AR-SK00015	1	Detailed External Elevation – North Part 2	02/09/22
ASB-TD-DR-AR-SK00016	1	Detailed External Elevation – South Part 1	02/09/22
ASB-TD-DR-AR-SK00017	2	Detailed External Elevation – South Part 2	Undated/ Date 55
ASB-TD-DR-AR-SK00018	1	Detailed External Elevation – East Part 1	02/09/22
ASB-TD-DR-AR-SK00019	1	Detailed External Elevation – East Part 2	02/09/22
ASB-TD-DR-AR-SK00020	1	Detailed External Elevation – West Part 1	02/09/22
ASB-TD-DR-AR-SK00021	1	Detailed External Elevation – West Part 2	02/09/22
ASB-TD-DR-AR-SK00022	1	Detailed External Elevation – West Part 3	02/09/22
SK00023	-	External Materials and Finishes	Undated
ASB-DD-DR-AR-SK0001	1	Building Signage – Sheet 1	01/08/22
ASB-DD-DR-AR-SK0002	1	Building Signage – Sheet 2	01/08/22
ASB-TD-DR-AR-0001	8	External Elevations – North and East	22/08/22
ASB-TD-DR-AR-0002	8	External Elevations – South and West	22/08/22
ASB-TD-DR-AR-30003	9	Link Bridge – Level 01 & 02 Plans & Roof Plan	22/08/22
ASB-TD-DR-AR-31030	5	External Elevation – Link Bridge	21/09/22
ASB-TD-DR-AR-5001	8	Sections	22/08/22
ASB-TD-DR-AR-5002	7	Sections	22/08/22
ASB-TD-DR-AR-35003	3	Sections – Link Bridge	22/08/22

BCA Crown Certificate - 6 (CC6),  
CRO-24056, 12 June 2024

BCA Crown Certificate - 7 (CC7),  
CRO-24042, 23 May 2024

Site inspection

Document review

	<table><tr><th colspan="4">Landscape Plans prepared by Site Image</th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>101</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>102</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>103</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>104</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>105</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>106</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>107</td><td>F</td><td>Landscape Plan Ground Level</td><td>23/08/2022</td></tr><tr><td>000</td><td>C</td><td>Landscape Cover Sheet</td><td>20/07/2022</td></tr><tr><td>001</td><td>C</td><td>Landscape Plan</td><td>20/07/2022</td></tr><tr><td>111</td><td>C</td><td>Landscape Plan 1</td><td>20/07/2022</td></tr><tr><td>112</td><td>C</td><td>Landscape Plan Level 1 Zone 02</td><td>20/07/2022</td></tr><tr><td>131</td><td>C</td><td>Landscape Plan Level 3</td><td>20/07/2022</td></tr><tr><td>141</td><td>C</td><td>Landscape Plan Level 4</td><td>20/07/2022</td></tr><tr><td>161</td><td>C</td><td>Landscape Plan Level 6</td><td>20/07/2022</td></tr></table>	Landscape Plans prepared by Site Image				Dwg No.	Rev	Name of Plan	Date	101	F	Landscape Plan Ground Level	23/08/2022	102	F	Landscape Plan Ground Level	23/08/2022	103	F	Landscape Plan Ground Level	23/08/2022	104	F	Landscape Plan Ground Level	23/08/2022	105	F	Landscape Plan Ground Level	23/08/2022	106	F	Landscape Plan Ground Level	23/08/2022	107	F	Landscape Plan Ground Level	23/08/2022	000	C	Landscape Cover Sheet	20/07/2022	001	C	Landscape Plan	20/07/2022	111	C	Landscape Plan 1	20/07/2022	112	C	Landscape Plan Level 1 Zone 02	20/07/2022	131	C	Landscape Plan Level 3	20/07/2022	141	C	Landscape Plan Level 4	20/07/2022	161	C	Landscape Plan Level 6	20/07/2022				
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A3	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:</p> <p>(a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary;</p> <p>any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and</p> <p>the implementation of any actions or measures contained in any such document referred to in (a) above.</p>	Noted	Noted	Compliant																																																																	
A4	<p>The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.</p>	Noted	Noted	Compliant																																																																	
A5	<p>This consent lapses five years after the date of consent unless work is physically commenced.</p>	John Holland - Notification Letter, dated 3.05.23	Construction works commenced on 15th May 2023	Not triggered																																																																	
A6	<p>The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&amp;A Regulation.</p>	Document Review  Site inspection  Interviews.	No non-compliant findings were recorded for the fourth audit period. As such, the development was found to have been carried out in compliance with all the relevant and triggered conditions of this consent.	Compliant																																																																	
A7	<p>In the event of a dispute between the Applicant and a public 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.</p>	Interview - R. Ingall	No disputes reported at the time of the fourth audit inspection.	Not triggered																																																																	
A8	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document for information or approval; and</p>	Document Review  Interview: R Ingall	The audit found that consultation had been adequately undertaken.  Evidence provided with first audit.	Compliant																																																																	

	(b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.				
A9	The project may be constructed in stages. Where compliance with conditions is required to be staged due to staged construction, a Staging Report must be prepared and submitted to the satisfaction of the Certifier. The Staging Report must be submitted to the Certifier no later than one month before the commencement of construction of the first of the proposed stages.	SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 11 May 2023  SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 15 January 2024  Evidence of staging report issue - email dated 8 February 2023 4:23:00 PM  SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, Rev G dated 18 April 2024	Deemed compliant in previous audits.	Compliant	
A10	A Staging Report prepared in accordance with condition A9 must:  (a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;  (b) specify how compliance with conditions will be achieved across and between each of the stages of the project; and  (c) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, Rev G dated 18 April 2024	Section 2.1 of the Staging Report  Section 2.2 and Appendix A (SSD-35999468 Conditions of Consent Matrix) of the Staging Report  Section 1.6 of the Staging Report	Compliant	
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Certifier.	Site Inspection  Interview: R Ingall	At the time of the fourth audit construction of the Superstructure was being completed in accordance with Stage 5, along with internal fit out as per Stage 6 of the Staging Report.	Compliant	
A12	Where construction is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report including independent auditing requirements.	Noted	Noted	Compliant	
A13	The Applicant may:  (a) prepare and submit any strategy, plan (including management plan, architectural or design 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 (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program);  (b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and	Noted	Noted	Compliant	

	(c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or 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).				
<b>A14</b>	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	Document review	Noted	Compliant	
<b>A15</b>	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Noted	Noted	Compliant	
<b>A16</b>	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	CEMP and Sub-plans CC5, CC6 and CC7	Current vesion of the CEMP and sub-plans were implimented during the fourth audit period.	Compliant	
<b>A17</b>	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> • <i>Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.</i> • <i>Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District</i>	CC5, CC6 and CC7	Deemed compliant in previous audit.	Compliant	
<b>A18</b>	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	CC6  Letter to Department - Condition B4 – External Walls and Cladding, dated 17 June 2024	Deemed compliant in the previous audit.	Compliant	
<b>A19</b>	The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided:  (a) the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials;  (b) the quality and durability of any alternative material is the same standard as the approved external building materials; and  (c) a copy of the documentation given to the Certifier is provided to the Planning Secretary within seven days after the Certifier accepts it	As above	As above	Compliant	
<b>A20</b>	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	CC5 - CC7  Interview: R Ingall	Latest information sources are considered.	Compliant	







	<p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> <p>(vi) a summary of the current stage and progress of the development;</p> <p>(vii) contact details to enquire about the development or to make a complaint;</p> <p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>(x) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.</p>	<p>Monthly Dust, Noise and Vibration Monitoring Reports July - Dec 2024.</p> <p>CEMP, Rev 4, 17/12/2024 CTPSMP, Rev 02, 20/09/2024 GWMP, Rev 01, 01/09/2023 CWMP, Rev 02, 10/09/2024</p>	<p>Monthly summary monitoring reports are provided on website for the audit period.</p> <p>Newsletters for July, October and December 2024 and News posted for October, November and December 2024, along with a presentation of the project timeline is provided on the applicant's website.</p> <p>A "Contact Us" page does contain and on-line enquiry form, HI email address and details for media enquiries.</p> <p>The complaints register up to December 2024 is provided on the applicant's Project website.</p> <p>Audit Report's #1, #2 and #3 along with applicants responses are provided on the applicant's Project website.</p> <p>No other matters identified.</p> <p>Staging Report, CTPSMP and CWMP were updated since previous audit and uploaded to the applicant's Project website.</p>		
<b>A24</b>	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	<p>Interview R O'Neill</p> <p>Shoalhaven Hospital - Re-development Project Induction</p>	The Project Induction adequately details the relevant environmental management requirements and conditions. The auditor sighted a sample of up to date induction records on screen during the fourth audit inspection, along with up to date training records.	Compliant	
<b>A25</b>	The Planning Secretary must be notified through the major projects portal 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.	Interview R Ingall, R O'Neill, L Lun	No environmental incidents reported during the audit period.	Not triggered	
<b>A26</b>	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.		As above	Not triggered	
<b>A27</b>	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	<p>Interview R Ingall</p> <p>Letter to Department, 26 September 2024 – Notification of Non-compliance.</p>	Non-compliances reported from the third audit were notified to Department within the required timeframe of the condition.	Compliant	
<b>A28</b>	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.	As above	The notification and response includes application number, relevant conditions, the way in which development does not comply, and reasons for the non-compliances and actions to be undertaken	Compliant	
<b>A29</b>	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted	Noted	Compliant	
	<p>Within three months of:</p> <p>(a) the submission of an incident report under condition A26</p>		No incidents reported during the fourth audit period.	Compliant	

A30	<p>(b) the submission of an Independent Audit under condition C39 or C41;</p> <p>(c) the approval of any modification of the conditions of this consent; or</p> <p>(d) the issue of a direction of the Planning Secretary under condition A3 which requires a review,</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	<p>Letter - SSD-35999468 Shoalhaven Hospital, Revisions of Strategies, Plans and Programs, dated 2 October 2024</p> <p>JH-TRANSMIT-003308 - CEMP</p>	<p>The Planning Secretary and Certifier were notified of review of strategies, plans and programs following Audit #3.</p> <p>Construction Environmental Management Plan (CEMP) rev 04, dated 17/12/2024 has been updated to include in response to Audit #3 findings. The CEMP was submitted to the Certifier with no response provided at the time of the fourth audit inspection.</p> <p>No modification/s since previous audit.</p> <p>No such direction</p> <p>The review was notified via the response to audit #3.</p>		
A31	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (only where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) 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>	JH-TRANSMIT-003308 - CEMP	The recently updated CEMP was provided to the Certifier, while no response had been provided at the time of the fourth audit inspection.	Compliant	
PART B - Prior to Commencement of Construction					
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction at least 48 hours before that date.	CC5, CC6 and CC7	No new stage/s commenced during the fourth audit period	Compliant	
B2	If the construction of the development is to be staged, the Planning Secretary 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.	<p>CC5 - CC7 and related Post-approval Documents</p> <p>Letter to Department, 14 December 2023 - Notice of commencement - Stage 5</p> <p>Letter to Department, 12 April 2024 - Notice of commencement - Stage 6</p> <p>Letter to Department, 20 May 2024 - Notice of commencement - Stage 7</p>	As above	Compliant	
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	CC5 - CC7	Structural drawings were provided to the Certifier for stages 5, 6 and 7 for approval of CC5, CC6 and CC7.	Compliant	

<b>B4</b>	Prior to the commencement of façade construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	CC6  Letter to Department - Condition B4 – External Walls and Cladding, dated 17 June 2024	External cladding and façade certification accepted by Certifier for CC6.	Compliant	
<b>B5</b>	<p>Prior to the commencement of construction, the Applicant must:</p> <p>(a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</p> <p>(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;</p> <p>(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and</p> <p>(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.</p>	<p>Email - Shoalhaven Hospital Redevelopment - TPG Fibre relocation, dated 16/05/2023</p> <p>Jacobs consultation correspondence - Gas, Electrical and Water consultation documents</p> <p>Shoalhaven District Memorial Hospital DILAPIDATION REPORT, 21 February 2023</p> <p>CC1</p> <p>Email - Shoalhaven Hospital Redevelopment Pre-construction dilapidation report, to Council, dated 04/05/2023</p>	<p>Consultation was undertaken in accordance with this condition.</p> <p>The Pre-Construction Dilapidation Report was prepared in accordance with this condition.</p> <p>The Pre-Construction Dilapidation Report was provided to the asset owner, Certifier and Council.</p> <p>Not requested at the time of the fourth audit inspection</p>	Compliant	
<b>B6</b>	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of buildings that are likely to be impacted by the development.	<p>Letter - Project reference: SHOALHAVEN HOSPITAL, Job No: 130247, DIPAPIDATION REPORTS EXTENT</p> <p>Interview: R Ingalls</p>	Surrounding properties are reported not likely to be affected by the construction works.	Not triggered	
<b>B7</b>	Where the offer for a pre-construction survey is accepted (as required by condition B6), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.		As above - no offers required.	Not triggered	
<b>B8</b>	<p>Prior to the commencement of any vibration generating construction works that could impact on the buildings surveyed as required by condition B7, the Applicant must:</p> <p>(a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report;</p> <p>(b) submit a copy of the Pre-Construction Survey Report to the Certifier; and</p> <p>(c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary within seven days when requested.</p>	Letter - Project reference: SHOALHAVEN HOSPITAL, Job No: 130247, DILAPIDATION REPORTS EXTENT	Provided as part of first audit	Not triggered	

B9	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate to the Certifier that the ESD initiatives recommended by the ESD Report (prepared by Steensen Varming, Revision 2, dated 11/05/22) have been incorporated into the design of the development.	Letter - Statement of Compliance to ESD SSDA Conditions, Ref. No. 207163, day May 5th, 2023 CC	Sustainability consultant confirmed that ESD were incorporated into design.	Compliant	
B10	The project is to achieve compliance with section 2.5.6 of the Health Infrastructure Engineering Services Guidelines dated 6 August 2021 (including Design Guidance Note No. 058) by attaining a minimum of 45 points in accordance with the ESD Evaluation Tool.	As above	The project attained 66 points in accordance with the ESD Evaluation Tool	Compliant	
B11	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Certification of Design - Electrical Service, Heyday Group, dated 31/01/2024	Electrical Services including lighting certified against BAC and AS prior to installation.	Compliant	
B12	Prior to the commencement of construction, demolition work plans required by AS 2601-2001The demolition of structures (Standards Australia, 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 the statement of compliance must be submitted to the Certifier and Planning Secretary.	Letter - Statement of Compliance Shoalhaven Hospital Demolition Work Plan, dated 14th May 2023 CC1	The Demolition Work Plan is stated to meet the requirements of this condition as accepted by the Certifier and submitted to the Secretary with CC1.	Compliant	
B13	Prior to the construction of the helipad, a report prepared by a suitably qualified and experienced aviation professional must be submitted to the satisfaction of the Certifier which states that the design of the helipad incorporates the relevant details outlined in the Civil Aviation Safety Authority publication Advisory Circular AC 139R-01 v1.0 Guidelines for heliports - design and operation and other relevant National and International guidelines.	Interview: R Ingall Helicopter Landing Site Design Development Report 9 September 2022 Compliance Certificate 16 November 2023	Report prepared in accordance with the condition and to the satisfaction of Certifier.	Compliant	
B14	<del>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 must be identified in consultation with relevant stakeholders in accordance with Civil Aviation Safety Authority publication Advisory Circular AC 139R-01 v1.0 Guidelines for heliports - design and operation and other relevant National and International guidelines.</del>	Mod 3			
B15	<del>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 Certifier and a copy submitted to the Planning Secretary and Council prior to the commencement of construction.</del>	Mod 3			
B16	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). <i>Notes:</i> • The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval">https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval</a> • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Document Review	The audit found management plans required under these conditions of consent are compliant with B16.	Compliant	
	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and must be published on the Applicant's website in accordance with condition A23. The CEMP must include, but not be limited to, the following:	Construction Environmental Management Plan (CEMP) rev 04, dated 17 December 2024 Erosion and Sediment Control	Updated CEMP and Erosion and Sediment Control Plan is published on the applicant's project website.	Compliant	



B18	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council and TfNSW;</p> <p>(c) detail:</p> <p>(i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;</p> <p>(ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;</p> <p>(iii) heavy vehicle routes, access and parking arrangements;</p> <p>(iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2;</p> <p>(v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s); and</p> <p>(vi) Any temporary access roads or footpaths from Shoalhaven Streets to the existing loading dock must comply with the CTPMSP.</p>	Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), Rev 02 prepared by TTW, dated 20 September 2024	<p>The CTPMSP was prepared by TTW (NSW), Traffic Engineering Detailed within Section 1.3 of the CTPMSP</p> <p>Addressed in Sections 3.2, 5.0 and 5.3 of the CTPMSP</p> <p>Adequately addressed in Sections 5.0 and 5.4 of the CTPMSP</p> <p>Addressed in Sections 4.3 and 4.4 of the CTPMSP</p> <p>Section 3.2.3 of the CTPMSP incorrectly describes the configuration of access gates in relation to the current site conditions, and as is presented in Figure 3.3. This is assumed by the auditor to be a typographical error either in the text or Figure 3.3 as the site is operating with the intent of the layout and as described. It is also noted that the Swept Path Analysis plans (see Drawing No. TTR11Z009, TTR11Z010 and TTR11Z011) are not aligned with the arrangements (gate numbers) presented in Figure 3.3. Gate 2 was observed to have signage aligned with Figure 3.3. This is seen as an opportunity for improvement by the auditor as the general intent of traffic arrangements are presented in Figure 3.3 and these were being implemented at the time of the fourth audit inspection.</p> <p>Adequately addressed Appendix A of the CTPMSP. See above comment regarding alignment with Figure 3.2 and current site conditions.</p> <p>Adequately address in Sections 3.2 and 4.4 of the CTPMSP</p> <p>Adequately address in Sections 3.2</p>	Compliant	
B19	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</p> <p>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</p> <p>(d) include strategies that have been developed with the community for managing high noise generating works;</p> <p>(e) describe the community consultation undertaken to develop the strategies in condition B19(d);</p>	Construction Noise and Vibration Management Sub-Plan (CNVMSP) prepared by Acoustic Logic (5 June 2023), Rev 1	<p>Section 7.7.3 discusses procedures for minimising noise impacts, where noise management levels in the ICNG have been predicted to be exceeded by site works.</p> <p>Table 16 shows predicted noise impacts from Demolition, excavation and piling, with time restrictions placed on high noise generating activities to improve the tolerance to the affected receivers from these high noise generating activities.</p> <p>Addressed in Section 8.3 Community Engagement that addresses the identification of stakeholder sensitive receivers and their particular concerns. It further lists assisting in coordinating construction activities to address concerns around sensitive periods (i.e. school exam periods); and goes on to describe specific measures to achieve these outcomes</p> <p>Addressed in Section 6 CNVMP and Appendix C, which lists the consultation outcomes</p>	Compliant	



	<p>(f) include a complaints management system that would be implemented for the duration of the construction; and</p> <p>(g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B16.</p>		<p>Addressed in Section 8.2.2 of the CNVMSP</p> <p>Addressed in Section 8 " Noise and Vibration Monitoring, Reporting and Response Procedures"</p>		
<b>B20</b>	<p>The Construction Waste Management Sub-Plan (CWMP) must address, but not be limited to, the procedures for the management of waste including the following:</p> <p>(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain;</p> <p>(b) information regarding the recycling and disposal locations; and</p> <p>(c) confirmation of the contamination status of the development areas of the site based on the validation results.</p>	<p>Construction Waste Management Plan (CWMP), Rev 02, dated 10/09/2024</p>	<p>The CWMP was reviewed and updated with new contact details as part of an internal review process.</p> <p>Addressed in Section 7 and Section 8 of the CWMP</p> <p>Addressed in Section 6 of the CWMP</p> <p>As above</p>	Compliant	
<b>B21</b>	<p>A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:</p> <p>(a) minimise the impacts of earthworks and construction on the local and regional road network;</p> <p>(b) minimise conflicts with other road users;</p> <p>(c) minimise road traffic noise; and</p> <p>(d) ensure truck drivers use specified routes.</p>	CTPMSP	<p>Addressed in Section 4.6 of CTPMSP</p> <p>As above</p> <p>As above</p> <p>Figure 4.2 CTPMP addresses truck routes.</p>	Compliant	
<b>B22</b>	<p>Prior to the commencement of construction, the Applicant must provide sufficient parking facilities , including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.</p>	<p>CTPMSP</p> <p>Shoalhaven District Memorial Hospital Redevelopment Construction Worker Parking Confirmation for Work Phase CC2, dated 6 July 2023</p> <p>Interview: R Ingall, R Collum</p>	<p>Section 5.2 of the CTPMSP outlines parking arrangements for the project early phases of the development. The CTPMSP was updated for the civil works phase to confirm adequate parking arrangements for the larger workforce.</p> <p>The parking confirmation for CC2 provides for adequate off-street parking.</p> <p>A complaint was received during the fourth audit period regarding a Project worker parking outside of contractor's carpark. This was not related to a lack of available contractor parking spaces and was addressed with the worker/s. including raising further awareness in the workforce.</p>	Compliant	
<b>B23</b>	<p>Prior to the commencement of construction, the Applicant must:</p> <p>(a) install erosion and sediment controls on the site to manage wet weather events; and</p> <p>(b) divert existing clean surface water around operational areas of the site.</p>	<p>Statement of Compliance Erosion and Sediment Control, Delta Pty Ltd, dated 14 May 2023</p> <p>Audit site inspection</p>	<p>Statement of Compliance confirms compliance for Stage 1 works and main works.</p> <p>Controls were previously deemed to be adequately installed prior to construction.</p>	Compliant	



B24	<p>Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils &amp; Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.</p>	<p>CEMP</p> <p>Erosion and Sediment Control Plan (SEEC, Rev 02, dated 25/09/2024)</p>	<p>Erosion and sediment controls were observed to have been extended to the southeastern corner of the site in response to the third audit. A rumble grid had been installed at Gate 2 in this area. Gate 2 was locked at the time of the fourth audit inspection and the auditor was advised this access is generally not used, but available if needed.</p> <p>The fourth audit site inspection was immediately preceded by a significant overnight storm and rainfall event considered likely to be well in excess of the design rainfall for erosion and sediment controls. The site controls were observed to have generally held up well around the site. The exposed areas in the vicinity of Gate 4 were observed to be impacted by the rainfall event and discharging some sediment from site. This was addressed immediately with the installation of temporary controls (coir logs) and further protection of the stormwater pit on Shoalhaven Street. The rainfall event highlighted the need to stabilised exposed areas as soon as practicable, noting however that the area discussed above remains highly trafficked at this stage of the construction program.</p>	Compliant	
B25	<p>Prior to installation of mechanical plant and equipment:</p> <p>(a) a detailed assessment of mechanical plant and equipment with compliance with the relevant project noise trigger levels as recommended in the Main Works Noise Impact Assessment dated 2 September 2022 and prepared by Acoustic Logic must be undertaken by a suitably qualified person; and</p> <p>(b) evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the project noise trigger levels identified in the Main Works Noise Impact Assessment prepared by Acoustic Logic and dated 2 September 2022.</p>	<p>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 18 April 2024</p> <p>CC6</p> <p>Mechanical Services Noise Emissions, Acoustic Services Pty Ltd, 23 April 2024</p> <p>Interview: R Ingall</p>	<p>Not triggered at the time of the audit.</p>	Not triggered	
B26	<p>Prior to the commencement of construction, evidence of compliance of construction parking and access arrangements with the following requirements must be submitted to the Certifier:</p> <p>(a) all vehicles must enter and leave the site in a forward direction;</p> <p>(b) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, is in accordance with the latest version of AS 2890.2; and</p> <p>(c) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, has been addressed.</p>	<p>CTPMSP</p> <p>CC1, CC2</p> <p>Interview: R Ingall</p> <p>Audit site inspection</p>	<p>Adequately addressed in Sections 4.4 of the CTPMSP</p> <p>Vehicle access points observed and vehicles leaving and entering site in a forward direction only.</p> <p>Adequately addressed Appendix A of the CTPMSP</p> <p>Adequately addressed in Sections 5.0 and 5.3 of the CTPMSP.</p> <p>Shared access points were observed to be actively managed at the time of the Audit #4 site inspection, including signage and traffic and access control personnel in place.</p>	Compliant	
	<p>Prior to the commencement of construction of operational parking and access facilities, evidence of compliance of the design of operational parking and access arrangements with the following requirements must be submitted to the Certifier:</p>			Compliant	

<b>B27</b>	<p>(a) a minimum of 665 on-site car parking spaces for use during operation of the development and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and</p> <p>(b) the swept path of the largest service vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.</p>	<p>Interview R. Ingall</p> <p>JH-TRANSMIT-003405 - SWEPT PATH, SIGNAGE AND LINEMARKING, TRAFFIC DESIGN REPORT DRAWINGS (x26)</p>	<p>Not within the construction contractor's scope of work for the Shoalhaven Hospital Redevelopment Project. This has been agreed to be included within CC8 in the staging plan so currently not triggered. It is expected to be triggered prior to the fifth audit and will need to be assessed accordingly at that audit event.</p> <p>Swept path drawings and associated drawings prepared in accordance with AS 2890.2 were provided to the Certifier.</p>		
<b>B28</b>	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier 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 Certifier.	Shoalhaven City Council - Consent for Works and/or Structures in a Public Road - Temporary Site Access Only, 3rd May 2023	No footpath or public domain works other than approved site access arrangements at the time of the audit inspection.	Compliant	
<b>B29</b>	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate to the Certifier that the mitigation measures recommended within the Pedestrian Wind Environment Statement prepared by ARUP dated 23 June 2022 have been incorporated into the development.	CC1, CC2	Not yet considered by the Certifier as relevant to the building design still underway prior to the building construction stage of the development.	Not triggered	
<b>B30</b>	Prior to the construction of the footpath along Shoalhaven Street, the Applicant must consult with the project Arborist to ensure that Trees 57-60 (as identified in the Arboricultural Development Impact and Tree Protection Report, dated 30 August 2022 prepared by Moore Trees) are suitably protected and retained.	<p>ARBORICULTURAL DEVELOPMENT IMPACT AND TREE PROTECTION REPORT, dated 18 July 2022</p> <p>CC1</p>	<p>Not yet triggered as footpath not under construction.</p> <p>Note: The auditor was provided with an older version of the stated arborist report than that identified in this condition. This older version is also referenced in CC1.</p> <p>No consultation with the arborist required to-date.</p>	Not triggered	
<b>B31</b>	<p>Prior to the commencement of construction, a professional engineer (as defined in the National Construction Code) must submit to the satisfaction of the Certifier, certification of the following items:</p> <p>a) all floor levels must be constructed at or above the 2050 scenario local catchment Probable Maximum Flood level as documented in a site-specific flood investigation. The site-specific flood investigation must be submitted to the Certifier for approval.</p> <p>b) any proportion of the structure below the 2050 scenario local catchment Flood Planning Level (2050 scenario 1% Annual Exceedance Probability flood level plus 500mm freeboard) as documented in a site-specific flood investigation must be built from flood compatible materials.</p> <p>c) all electrical installations must be constructed above the 2050 scenario local catchment Flood Planning Level or be able to be isolated prior to a flood event.</p>	<p>CIVIL DESIGN CERTIFICATE - CC2 – Bulk Excavation, 6 July 2023</p> <p>CC2, CC3</p>	<p>Certification confirms conformance with this condition for CC2 works, noting that the ground floor level of the ASB is 6 m above the Probable Maximum Flood and all related electrical levels will be at a similar level.</p> <p>Certification confirms conformance with this condition for CC3 works</p>	Compliant	
<b>B32</b>	Prior to the commencement of construction, a professional engineer (as defined in the National Construction Code) must submit to the satisfaction of the Certifier, certification that the building and associated structure(s) can withstand forces of local catchment floodwaters including debris and buoyancy forces up to a 2050 scenario Probable Maximum Flood event.	As above	Condition deemed compliant based on above note.	Compliant	

B33	<p>Prior to the commencement of construction, a detailed design of permanent water quality, retention and reuse devices must be certified by a professional engineer, (as defined in the National Construction Code) who can demonstrate the appropriateness of the proposed design for the site in accordance with Council's Engineering Design and Construction Specifications. The detailed design is to be issued to the Certifier. The stormwater treatment, retention and reuse design must comply with the following:</p> <p>a) stormwater treatment infrastructure must comprise of <del>minimum</del> 240kL a rainwater tank (for coolant tower reuse), OceanGuard pit insert baskets, StormFilter proprietary treatment device(s) and raingarden(s) (and infiltration swales) in accordance with the approved stormwater management strategy.</p> <p>b) the WSUD strategy must be able to remove all litter greater than 40mm for flows up to the 4 exceedances per year (EY) event, 80% of Total Suspended Solids (TSS), 45% of Total Nitrogen (TN) and 45% of Total Phosphorus (TP) for the total site area as demonstrated using MUSIC software. The detailed MUSIC model must be provided to Council for information and approved by the Certifier.</p> <p>c) for proprietary treatment devices, documentation from the supplier providing evidence that the proposed device has been appropriately sized for the contributing catchment must be submitted. Documentation from the supplier confirming the recommended MUSIC pollutant reduction targets must also be provided.</p>	<p>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 11 May 2023</p> <p>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 15 January 2024</p> <p>CC1, CC2, CC3</p> <p>MOD 2</p>	<p>Certification confirms conformance with this condition for CC3 works</p> <p>Provided in CC3 - WSUD and MUSIC Model</p> <p>Detailed designs were accepted by the Certifier for CC7</p>	Compliant	
B34	<p>Prior to the commencement of construction, a detailed design of infiltration basin stormwater quality improvement devices must be certified by a professional engineer, (as defined in the National Construction Code) who can demonstrate the appropriateness of the proposed design for the site in accordance with Council's Engineering Design and Construction Specifications. The detailed design is to be issued to the Certifier. The infiltration swales and basins' design must comply with the following:</p> <p>a) landscape details for the infiltration swales, basins and surrounds are to be included on the Landscape Plan and submitted to the Certifier for approval.</p> <p>b) the in-situ soil profile, depth to groundwater, measured infiltration rate (in device location) and details of any potentially contaminated soil and/or groundwater must be identified by a suitability qualified geotechnical engineer and contaminated land consultant and be submitted to Council and the Certifier.</p> <p>c) an infiltration asset must have a minimum 0.5m separation between the maximum groundwater level and the base of infiltration media.</p> <p>d) the in-situ infiltration rate must exceed the 100mm/hour saturated hydraulic conductivity modelled in MUSIC.</p>	<p>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 11 May 2023</p> <p>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 15 January 2024</p> <p>CC7</p> <p>Siteworks And Stormwater Drainage Plans, Detention Plan, Infiltration Swales and Basins Plans (Achitectus Conrad Gargett Pty Ltd, 2024)</p>	Detailed designs were accepted by the Certifier for CC7	Compliant	
B35	<p>Prior to the commencement of construction, a detailed design of infiltration basin stormwater quality improvement devices must be certified by a professional engineer, (as defined in the National Construction Code) who can demonstrate the appropriateness of the proposed design for the site in accordance with Council's Engineering Design and Construction Specifications. The detailed design is to be issued to the Certifier. The vegetated swales design must comply with the following:</p> <p>a) side slopes of 1:8 is recommended with a 1:5 maximum side slope permitted.</p> <p>b) minimum longitudinal grade of 2%.</p>	As above	As above	Compliant	

	<p>c) maximum longitudinal grade of 5% unless a steeper grade is approved by the Certifier.</p> <p>d) maximum Velocity x Depth product of 0.3 m<sup>2</sup> /s. Calculations are to be provided to Council for information and the Certifier for approval.</p> <p>d) maximum Velocity x Depth product of 0.3 m<sup>2</sup>/s. Calculations are to be provided to Council for information and the Certifier for approval.</p>				
<b>B36</b>	Adopted WSUD Management, Operation, Maintenance and Monitoring Manual(s) for the permanent water quality facilities must be submitted to Council and the Certifier prior to the commencement of construction. The manuals must be prepared by a suitably qualified professional in accordance with the objectives and criteria identified in the approved stormwater management strategy.	CC3	Provided in CC3 - Submission of WSUD	Compliant	
<b>B37</b>	Compliance checklists are to be prepared by the WSUD Designers and submitted to Council prior to the commencement of construction. The checklists must incorporate all checks and certifications that are required to be carried out during the civil construction phase, asset protection phase, landscape practical completion phase and final compliance inspection prior to final handover to future asset owner.	CC3	As above	Compliant	
<b>B38</b>	The width of the internal drop off/pick up area along the Shoalhaven Street frontage is to be widened by 1.13m to the west as indicated on marked up drawing Landscape Plan Ground Level, prepared by Site Image, drawing 103 Rev F and submitted as part of the Response to Submissions. Documentation demonstrating compliance with this requirement and evidence that the revision has been incorporated into the development must be submitted to the satisfaction of the Certifier prior to the commencement of construction.	<p>Interview: R Ingall</p> <p>Audit site inspection</p>	Works not yet undertaken at the time of the fourth audit.	Not triggered	
<b>B39</b>	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate to the Certifier that the recommendations within the Crime Prevention Through Environmental Design report prepared by Ethos Urban, dated 17 May 2022 have been incorporated into the development.	Design Statement for CC6 and CC7, Architectus Conrad Gagelt Pty Ltd, 28 March 2024	The recommendations within the Crime Prevention Through Environmental Design report prepared by Ethos Urban, dated 17 May 2022 have been incorporated into the development, and accepted by the Certifier.	Compliant	
<b>PART C - During Construction</b>					
<b>C1</b>	<p>A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements:</p> <p>(a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;</p> <p>(b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;</p> <p>(c) the approved hours of work, the name of the builder, Certifier, structural engineer, 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(s); and</p> <p>(d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.</p>	Site Notices	<p>The site notice(s) are appropriately dimensioned.</p> <p>The site notice(s) appear to be made of durable material</p> <p>All required aspects were present on the site notices at the time of the third audit inspection.</p> <p>The site notice (s) were appropriately mounted on the perimeter fencing near the main access points.</p>	Compliant	

C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner	Interview. R Ingall, R O'Neill  Site inspection	The Primary Contractor continues to maintain a Plant and Equipment Register and use a Checklist form to assess all plant and equipment that comes to site. A sticker system is used whereby each item of plant and equipment is designated a serial number and the sticker is stamped inspection and maintenance schedule details. The system was continuing to be implemented during the fourth audit period. Plant and equipment on site appeared to be operating efficiently without causing undue air quality or noise emissions.	Compliant	
C3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B12.	Demolition Work Plan, Shoalhaven Hospital, Rev CC dated 19/05/2023, Delta Group  Statement of Compliance - Shoalhaven Hospital Demolition Work Plan, 14th May 2023  CC1	The Demolition Work Plan was confirmed to meet the requirements of AS 2601-2001.	Compliant	
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:  (a) between 7am and 6pm, Mondays to Fridays inclusive; and  (b) between 8am and 1pm, Saturdays.  No work may be carried out on Sundays or public holidays.	Interview: R Ingall  CEMP  Complaints Register  Interview R. Ingall	No out of hours work during the fourth audit period.	Compliant	
C5	Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:  (a) between 6pm and 7pm, Mondays to Fridays inclusive; and  (b) between 1pm and 5pm, Saturdays.	As above	As above	Not triggered	
C6	Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:  (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or  (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or  (c) where the works are inaudible at the nearest sensitive receivers; or  (d) for the delivery, set-up and removal of construction cranes, where notice of the crane related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or  (e) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works	Interview R. Ingall	Refer above.  Not triggered  Not triggered  Not triggered  Not triggered during current audit period.  Not triggered	Not triggered	
C7	Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Interview R. Ingall	Notifications are provided to nearby residents when required.	Not triggered	

<b>C8</b>	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	As above	No such work undertaken outside of the stipulated hours up to the time of the fourth site audit inspection.	Not triggered	
<b>C9</b>	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Interview: R . Ingall  Site inspection  CTPMSP	Refer condition B18 c) iii), Section 3.2.3 of CTPMSP - text doesn't align with gate numbering in Figure 3.3: Phase 2 Construction Access Points and as implemented at site (ie. the site access arrangements are as per Figure 3.3. CTPMSP needs to be revised.  The development was being carried out generally in accordance with the CEMP and sub-plans at the time of the fourth audit inspection.	Compliant	
<b>C10</b>	All construction vehicles (excluding site personnel 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 or an approved on-street work zone before stopping.	CTPMSP Interview: R. Ingall	Addressed in the CTPMSP and Driver Code of Conduct. No construction vehicle were observed by the auditor outside of the construction site during the third audit inspection.	Compliant	
<b>C11</b>	The following hoarding requirements must be complied with:  (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and  (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	Site Inspection  Interview: R . Ingall, C. Sikes  Site inspection	Hoarding was still in place around the main construction areas, including a noise barrier rated for the adjoining operational Children's Daycare Centre and along the eastern boundary of the site..  Hoarding was observed to still be in good condition during the fourth audit inspection.  None observed during the third audit site inspection.  No graffiti was observed on the hoarding during the third audit inspection and the auditor was advised that this has not been an issue to-date.	Compliant	
<b>C12</b>	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	Site inspection	No obstructions were observed during the fourth audit site inspection	Compliant	



<b>C13</b>	<p>The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (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.</p>	<p>CNVMSPP</p> <p>Site inspection</p> <p>Interview: R Ingall</p> <p>Shoalhaven Hospital Redevelopment Complaints Register</p> <p>Noise and Vibration Monitoring Report - Section 5.1.1, Table 4, for December 2024.</p> <p>Work Notice - UPDATED: Further demolition work on hospital site – Notice of Potential Noise, 6 January 2025</p>	<p>The CNVMSP was being implement at the time of the third site audit inspection.</p> <p>A noise complaint from the community was reviewed in the week prior to the fourth audit inspeccion, not yet reported on the Complaints Regisetr that time. The complaint relates to high pressure water blasting between 7-9 January 2025. These works were a continuation of works unable to be completed at the end of 2024. The intial works were formally notified by a letter box drop on 6 and 11 December 2024, with a follow up letter dated 6 January 2025 to advise the need to extend the work activitiy. The work was conducted within allowable construction hours.</p> <p>The sample of noise records reviewed for the December 2024 period indicated that noise levels were typically below the Highly Noise Affected Management Level. This will need to be verified for the January 2025 period when the works were also undertaken. The complaint was still under review and preparation of response at the time of the fourth audit indpeccion.</p> <p>Correspondence associatated with the copmplaint also noted that it had been elevated to the local Member of Parliament and as such rerquiring a formal response via the Minister's office.</p> <p>The auditor is satisfied that the noise complaint, at the time of the fourth audit inspection, was being dealt with appropriately. It will need to be further reviewed during the fifth audit.</p> <p>There notably remains to be very few noise complaints received over the life of the project.</p>	Compliant	
<b>C14</b>	<p>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 C4.</p>	<p>CTPMSP</p> <p>Interview: R. Ingall</p>	<p>Addressed in the CTPMSP and Driver Code of Conduct.</p> <p>No reported instances of non-compliance with the requirement at the time of the fourth audit period.</p>	Compliant	
<b>C15</b>	<p>The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.</p>	<p>As above</p> <p>Site inspection</p>	<p>Quackers heard to be actively used on sit during the fourth audit site inspection.</p>	Compliant	
<b>C16</b>	<p>Vibration caused by construction at any residence or structure outside the site must be limited to:</p> <p>(a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and</p> <p>(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).</p>	<p>CNVMSPP</p> <p>Interview: R. Ingall</p> <p>Shoalhaven Hospital Redevelopment Complaints Register</p> <p>Email - Noise Complaint, dated 9 January 2025</p>	<p>Addressed in the CNVMSP</p> <p>The vibration monitoring data reviewed for the audit period generally fell within acceptable limits.</p>	Compliant	



<b>C17</b>	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 C16.	As above	No vibration compactors used within 30m of residences up to date of fourth audit site inspection.	Compliant	
<b>C18</b>	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B17 of this consent.	Noted	Noted	Compliant	
<b>C19</b>	<p>For the duration of the construction works:</p> <p>(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;</p> <p>(b) all street trees immediately adjacent to the property boundaries must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;</p> <p>(c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Development Impact and Tree Protection Report prepared by Moore Trees Arboricultural Services dated 30 August 2022; and</p> <p>(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.</p>	<p>Interview: R Ingall</p> <p>Site Inspection</p> <p>Noted</p>	<p>Trees only removed as approved by the development.</p> <p>Street trees were observed to be protected around the trunk and are outside of the fenced construction zone.</p> <p>On-site trees identified to be kept were observed to be fenced off and clearly identified as being for protection.</p> <p>No requirement to access up to date of the fourth audit site inspection.</p>	Compliant	
<b>C20</b>	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<p>CEMP</p> <p>Site Inspection</p> <p>Interview: R Ingall</p> <p>Shoalhaven Hospital Redevelopment Complaints Register</p>	<p>Water cart and hose application of water is used to reduce potential dust emissions. The site was not observed to be generating dust during the fourth audit site inspection following significant overnight rainfall.</p> <p>No complaints were received regarding dust generation during the fourth audit period.</p>	Compliant	
<b>C21</b>	<p>During construction, the Applicant must ensure that:</p> <p>(a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;</p> <p>(b) all trucks entering or leaving the site with loads have their loads covered;</p> <p>(c) trucks associated with the development do not track dirt onto the public road network;</p> <p>(d) public roads used by these trucks are kept clean; and</p> <p>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</p>	<p>CEMP</p> <p>Site Inspection</p> <p>Interview: R Ingall</p>	<p>Refer above.</p> <p>Spoil and waste material loads are required to be covered.</p> <p>Rumble grid and gravel driveway in place at main site access. No significant dirt tracking off-site was observed at the main site entrance (Gate 1) or Gate 2 by the auditor. A rumble grid was installed at Gate 2 since the third audit. Gate 2 was locked at the time of the fourth audit inspection and the auditor was advised that this access point is no longer in general use.</p> <p>As above</p> <p>Some stabilisation work has been advanced along Shoalhaven Street since the third audit. Refer condition B24 regarding highly trafficked areas that will require stabilisation as soon as practicable.</p>	Compliant	

<b>C22</b>	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works, shall have regard to potential flooding 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. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	CEMP Site Inspection Interview: R Ingall Erosion and Sediment Control Plan (SEEC, Rev 02, dated 25/09/2024)	Erosion and sediment controls were observed to have been extended to the southeastern corner of the site in response to the third audit. A rumble grid had been installed at Gate 2 in this area. Gate 2 was locked at the time of the fourth audit inspection and the auditor was advised this access is generally not used, but available if needed.  The fourth audit site inspection was immediately preceded by a significant overnight storm and rainfall event considered likely to be well in excess of the design rainfall for erosion and sediment controls. The site controls were observed to have generally held up well around the site. The exposed areas in the vicinity of Gate 4 were observed to be impacted by the rainfall event and discharging some sediment from site. This was addressed immediately with the installation of temporary controls (coir logs) and further protection of the stormwater pit on Shoalhaven Street. The rainfall event highlighted the need to stabilise exposed areas as soon as practicable, noting however that the area discussed above remains highly trafficked at this stage of the construction program.	Compliant	
<b>C23</b>	The Applicant must: (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site;  (b) keep accurate records of the volume and type of fill to be used; and  (c) make these records available to the Certifier upon request.	SDMH - Material Tracking Register Interview: R Ingall, R O'Neill	Records of importation of VENM material from local quarry sighted on screen by the auditor.  Records adequately meet this requirements.  Not requested to date.	Compliant	
<b>C24</b>	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	CC2 Design Certificate – Civil / Stormwater, 21 July 2023  Erosion and Sediment Control Plan (SEEC, Rev 02, dated 25/09/2024)	The updated Erosion and Sediment Control Plan was provided the Certifier along with the CEMP. No response had been provided at the time of the fourth audit site inspection.	Compliant	
<b>C25</b>	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	Site Induction	The Site Induction adequately addresses this requirement.	Compliant	
<b>C26</b>	Within three months of the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must:  (a) be designed by a suitably qualified and experienced person(s);  (b) be generally in accordance with the conceptual design in the civil and stormwater plans prepared by Meinhardt Bonacci, dated Feb 22, Drawing No's ASB-DD-DRG-CV-001 to ASB-DD-DRG-CV-080;  (c) be in accordance with applicable Australian Standards; and  (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.	CC1, CC2 Interview: R Ingall  CC3	Certification confirms conformance with this condition for CC3 works	Compliant	
<b>C27</b>	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by ecological Australia dated 27 June 2022.	Aboriginal Cultural Heritage Assessment Report (ACHAR), dated 27 June 2022	The ACHAR reports that no Aboriginal heritage site, places, or cultural values will be impacted by the development. It goes on to recommend unexpected finds are appropriately managed.	Compliant	

<b>C28</b>	<p>In the event that surface disturbance identifies a new Aboriginal object:</p> <p>(a) all works must halt in the immediate area to prevent any further impacts to the object(s);</p> <p>(b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;</p> <p>(c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;</p> <p>(d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and</p> <p>(e) works may only recommence with the written approval of the Planning Secretary.</p>	<p>CEMP</p> <p>Site induction.</p> <p>Interview: R Ingall</p>	<p>Section 14 - Appendix 6 of the CEMP addressed unexpected finds for Aboriginal Cultural Heritage, which is also addressed in the site induction for all personnel.</p> <p>No unexpected finds reported up to the time of the third audit site inspection.</p>	Not triggered	
<b>C29</b>	<p>If any unexpected archaeological relics are uncovered during the work, then:</p> <p>(a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;</p> <p>(b) 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 as determined in consultation with Heritage NSW; and</p> <p>(c) works may only recommence with the written approval of the Planning Secretary.</p>	As above	<p>Section 13 - Appendix 5 of the CEMP addressed Unexpected Heritage Finds.</p> <p>No unexpected finds reported up to the time of the audit site inspection.</p>	Not triggered	
<b>C30</b>	All waste generated during construction 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.	<p>CWMP</p> <p>Site inspection</p>	Waste storage and separation was observed on site undertaken in accordance with the CWMP during the fourth audit inspection.	Compliant	
<b>C31</b>	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	<p>As above</p> <p>PRJ001422-ACM001 - Asbestos Materials Clearance Inspection Report, Property Risk Australia Pty Ltd, 20 September 2024</p> <p>Interview: R Ingall</p>	<p>Waste classification is addressed in the CWMP. Waste segregation was observed on-site as per the management measure identified in the CWMP.</p> <p>An unexpected find of suspected asbestos fibre cement was located on the Council strip outside of Gate 1. A Licenced Asbestos Assessor inspected the site on 20 September 2024 and removed the small piece of assumed asbestos containing material for disposal and provided site clearance, noting the need for caution with any future excavation work.</p>	Compliant	

C32	The Applicant must ensure that concrete waste and rinse water is prevented from entering any natural or artificial watercourse.	As above	This requirement is addressed in the CWMP.  Concrete washout is being captured in washout bags for off-site disposal.	Compliant																																	
C33	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	Development Application No. DA-283/2011 - Waste Sorting Facility  Sample of waste disposal receipts as held by Orange Bins Group Pty Ltd (Orange Bins)  Orange Bins monthly waste tracking reports for July 2024 to December 2024	The waste tracking reports (spreadsheets) are adequately recording waste generation/disposal.  Waste from the site continues to be removed by Orange Bins Group Pty Ltd where it is taken to their approved waste sorting facility at 79 Gow Street, Padstow, NSW. The auditor was advised that once the waste is sorted, it is currently then taken to the below facilities: <table><tr><th>Waste</th><th>Tipping Facility</th><th>EPL/DA Number:</th><th>Suburb</th></tr><tr><td>Brick/ Concrete</td><td>Orange Recycling P/L</td><td>2016/309/1</td><td>Yennora NSW</td></tr><tr><td>Metal/ Steel</td><td>InfraBuild</td><td>872</td><td>Chipping Norton NSW</td></tr><tr><td>Timber/ Green Waste</td><td>ACT Recycling</td><td>575</td><td>Symonston ACT</td></tr><tr><td>Cardboard/ Paper</td><td>Paper Trade</td><td>21059</td><td>Moorebank NSW</td></tr><tr><td>Plaster and Gyproc</td><td>ACT Recycling</td><td>575</td><td>Symonston ACT</td></tr><tr><td>Residual/landfill waste</td><td>ACT Recycling</td><td>575</td><td>Symonston ACT</td></tr><tr><td>Foodscrap</td><td>Suez Recycling</td><td>20026</td><td>Padstow</td></tr></table>  The auditor sighted a sample of monthly waste summary reports and waste delivery dockets generate by the above receival facilities during the fourth audit period.	Waste	Tipping Facility	EPL/DA Number:	Suburb	Brick/ Concrete	Orange Recycling P/L	2016/309/1	Yennora NSW	Metal/ Steel	InfraBuild	872	Chipping Norton NSW	Timber/ Green Waste	ACT Recycling	575	Symonston ACT	Cardboard/ Paper	Paper Trade	21059	Moorebank NSW	Plaster and Gyproc	ACT Recycling	575	Symonston ACT	Residual/landfill waste	ACT Recycling	575	Symonston ACT	Foodscrap	Suez Recycling	20026	Padstow	Compliant	
Waste	Tipping Facility	EPL/DA Number:	Suburb																																		
Brick/ Concrete	Orange Recycling P/L	2016/309/1	Yennora NSW																																		
Metal/ Steel	InfraBuild	872	Chipping Norton NSW																																		
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Plaster and Gyproc	ACT Recycling	575	Symonston ACT																																		
Residual/landfill waste	ACT Recycling	575	Symonston ACT																																		
Foodscrap	Suez Recycling	20026	Padstow																																		
C34	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	Interview: R Ingall Asbestos Monitoring Register	Refer condition C31 - An unexpected find of bonded asbestos was identified and managed in accordance with the CEMP and CWMP.	Compliant																																	
C35	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Interview: R Ingall	Not triggered for this stage of the development, however design certification was provided with CC7 demonstrating compliance the standard.	Not triggered																																	
C36	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	This audit	This fourth Independent Audit inspection was undertaken within 26 weeks of the third audit.	Compliant																																	
C37	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Letter - Shoalhaven Hospital Redevelopment (SSD 35999468) Independent Auditor Approval January 2025 - DPE, dated 09/01/2025	The audit team was agreed by the Planning Secretary.	Compliant																																	
C38	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements, upon giving at least 4 week’s notice (or timing) to the Applicant of the date upon which the audit must be commenced.	Noted	No changes to audit program requested.	Not triggered																																	
C39	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:  (a) review and respond to each Independent Audit Report prepared under condition C36 of this consent, or condition C38 where notice is given by the Planning Secretary;  (b) submit the response to the Planning Secretary; and	Project Website	Review and Response to third audit prepared and provided to Planning Secretary.  Provided on the project website.	Compliant																																	

	(c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agree by the Planning Secretary.				
C40	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.	Post approval report	Response report submitted to Planning Secretary within condition timeframe	Compliant	
C41	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	Noted	Noted	Not triggered	
<b>PART D - Prior to Commencement of Operation</b>					
	D1 - D30 not considered to be triggered at the time of the fourth audit.			Not triggered	
<b>PART E - Post Occupation</b>					
E1 to E18	Occupation, not triggered for this fourth Audit			Not triggered	
<b>APPENDIX 2 - WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS</b>					
1	A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal 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 A25 or, having given such notification, subsequently forms the view that an incident has not occurred.	Interview: R Ingall		Not triggered	
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; (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.	As above		Not triggered	
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.	As above		Not triggered	
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.	As above		Not triggered	

## **Appendix B Audit Plan**

## Appendix C Independence declarations



Prepared for John Holland Group

# **Shoalhaven Hospital Redevelopment (SSD-35999468)**

**Independent Audit**

January 2025

Project Number: 230085



## Document verification

Project Title:	Independent Audit
Project Number:	230085
Project File Name:	230085 Audit Plan 4

Revision	Date	Prepared by	Reviewed by	Approved by
Final	6/01/2025	Will Weir	Natascha Arens	Will Weir

NGH Pty Ltd is committed to environmentally sustainable practices, including fostering a digital culture and minimising printing. Where printing is unavoidable, NGH prints on 100% recycled paper.

Audit Plan details	
<b>Audited Organisation</b>	Health Infrastructure (Proponent) John Holland Group (JHG) (Construction Manager)
<b>Project</b>	Shoalhaven Hospital Redevelopment Construction of a seven-storey hospital building with rooftop plant, helipad, ambulance entry from Shoalhaven Street, loading dock and mortuary parking, including demolition works, earthworks, tree removal, landscaping and utility works
<b>Location of Audit</b>	Shoalhaven Hospital, Scenic Drive, Nowra, 2541 <u>Lot and Deposited Plans (DP):</u> Lot 373 DP 755952 Lot 1 DP 1043088 Lot 1031 DP 1208730 Lot 1032 DP 1208730 Lot 102 DP 1165533 Lot 104 DP 1165533 and Lot 7034 DP 1031852
<b>Proposed Date of Site Audit</b>	Within 26 weeks of third audit (July 2024) 16 January 2025 <del>July 2024</del>
<b>Audit Criteria</b>	State Significant Development: SSD-35999468
<b>Proposed Audit Details</b>	Opening meeting: 08:30 on 16 January 2025 Closing meeting: on/around 14:30 on 16 January 2025
<b>Project representatives required</b>	<ul style="list-style-type: none"> <li>Proponents' representative/s</li> <li>Project's Environmental Manager/ delegate (Persons responsible for environment compliance of the development)</li> <li>Site/ Project Manager/ delegated authority (Persons with management responsibility for compliance of the development)</li> </ul>
<b>Audit Team</b>	Natascha Arens, NGH – lead auditor (off-site only) Will Weir, NGH – auditor (site inspection)
<b>Audit report</b>	A draft Audit Report is provided to JHG upon completion of the desktop review of audit evidence, allowing a single consolidated set of review comments  A final audit report is provided to JHG at the completion of the audit process
<b>Previous Audit date</b>	25 July 2024 Shoalhaven Hospital Redevelopment (SSD- 35999468)

Audit Plan details	
	Independent Environmental Audit (NGH, February 2024)



#### **NGH Pty Ltd**

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: [ngh@nghconsulting.com.au](mailto:ngh@nghconsulting.com.au)

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Surry Hills NSW 2010

T. (02) 8202 8333

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(PO Box 470)  
Bega NSW 2550

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Melbourne VIC 3000

T: (03) 7031 9123

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Townsville QLD 4810

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Brisbane QLD 4000

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Hamilton NSW 2303

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#### **WAGGA WAGGA - RIVERINA & WESTERN NSW**

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Wagga Wagga NSW 2650

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#### **CANBERRA**

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(PO Box 62)  
Fyshwick ACT 2609

T. (02) 6280 5053

#### **SUNSHINE COAST**

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Maroochydore QLD 4558

(07) 4410 9000

#### **WODONGA**

Unit 2, 83 Hume Street  
(PO Box 506)

Wodonga VIC 3690

T. (02) 6067 2533

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## 6. Appendices

### Appendix A – Declaration of Independence Form Template

#### Declaration of Independence - Auditor

---

Project Name: Shoalhaven Hospital Redevelopment

---

Consent Number SSD 35999468

---

#### Description of Project

- Construction of 7 story building (demolition, earthworks, subdivision and landscaping)
- 

Project Address: Lot 104 DP 1165533, Shoalhaven St, Nowra NSW 2541

---

Proponent: Health Infrastructure (via primary contractor – John Holland Group)

---

Date 12/12/2024

---

I declare that:

- I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- I am not an Environmental Representative for the project; and
- I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- 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) 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 and
  - 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 Proposed Auditor:** Natascha Arens

**Signature**



**Qualifications** RABQSA Exemplar Global lead environmental auditor, BAppSc  
MBEM

**Company:** NGH PTY LTD

---

## 6. Appendices

### Appendix A – Declaration of Independence Form Template

#### Declaration of Independence - Auditor

---

Project Name: Shoalhaven Hospital Redevelopment

---

Consent Number SSD 35999468

---

#### Description of Project

- Construction of 7 story building(demolition, earthworks, subdivision and landscaping)
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---

Proponent: Health Infrastructure (via primary contractor – John Holland Group)

---

Date 12/12/2024

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I declare that:

- I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- I am not an Environmental Representative for the project; and
- I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- 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) 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 and
  - 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 Proposed Auditor:** Will Weir



**Signature**

**Qualifications** BE (Environmental) Hons, experienced auditor.

**Company:** NGH PTY LTD

## Appendix D Audit team approval

NSW Planning ref: SSD-35999468-PA-30

Kathryn Saunders  
Senior Advisor, Town Planning  
HEALTH INFRASTRUCTURE  
1 RESERVE ROAD  
ST LEONARDS New South Wales 2065  
09/01/2025

---

Sent via the Major Projects Portal only

Subject: Shoalhaven Hospital Redevelopment - Auditor Approval January 2025

Dear Ms Saunders

I refer to your letter dated 18 December 2024, seeking the agreement of the Planning Secretary of the Department of Planning, Housing and Infrastructure ("NSW Planning") of the suitability of the auditors' qualifications, experience and independence to undertake an independent audit of the Shoalhaven Hospital Redevelopment ("the development"), in accordance with Part C, Condition C36 of State significant development consent SSD35999468, as modified ("the consent").

Having considered the qualifications and experience of Ms Natascha Arens, the lead auditor and Mr Will Weir, the assistant auditor of NGH Pty Ltd ("the audit team"), as nominee of the Planning Secretary, I endorse the appointment of the audit team, in accordance with Condition C37 of the consent. This approval is conditional on the audit team being independent of the development and maintaining Exemplar Global certification. NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer on [REDACTED] or by email to [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly".

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

## Appendix E Agency consultation

**From:** [Emma Nicoll](#)  
**To:** [Will Weir](#)  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) - Independent Environmental Audit (STH24/00079/003)  
**Date:** Wednesday, 8 January 2025 4:45:28 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.png](#)  
[image007.png](#)

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Hi Will,

Further to your email below dated 6 January 2025, Transport for NSW (TfNSW) understands:

- The Independent Environmental Audit is being undertaken in accordance with Conditions C36 to C41 of SSD 35999468 (the consent).
- The Independent Environmental Audit is looking at compliance with all conditions of the above consent.
- The consent does not specifically require consultation with TfNSW as part of the Independent Environmental Audit, however, there are conditions in the consent that do require consultation with TfNSW (e.g. Condition B18 - Construction Traffic and Pedestrian Management Sub-Plan and Condition D18 and D19 – Green Travel Plan).

Having regard to the above, TfNSW provides the following comments:

- There are no specific compliance issues relevant to the development that TfNSW would like NGH to focus on at this time.
- Advice has been previously provided by TfNSW on the draft Construction Traffic & Pedestrian Management Sub-Plan (CTPMSP) as required by Condition B18. The audit should ensure the requirements of this plan are being complied with during construction.
- Discussions directly with the TfNSW Demand Management Team should occur sooner rather than later to ensure there are no delays in the latter sections of the project/required post-consent approvals noting that the Green Travel Plan has to be prepared to the satisfaction of the TfNSW Travel Demand Management Team (as required by Condition D18).
- Separate consultation should be had with Shoalhaven City Council.

Should you have any questions concerning the above please let me know.

Best Regards,

**Emma Nicoll**

Case Officer, Development Services  
Transport Planning – Planning, Integration and Passenger  
**Transport for NSW**

T  E   
[transport.nsw.gov.au](https://transport.nsw.gov.au)

As we approach the Christmas and New Year period, please be aware that our last business day will be Friday the 20<sup>th</sup> of December, 2024 and we will return on Monday the 6<sup>th</sup> of January, 2025.



I recognise and acknowledge that modern New South Wales is an overlay on Aboriginal land and that many of the transport routes of today follow songlines Aboriginal people have followed for tens of thousands of years. I pay my respects to the Aboriginal people of NSW and Elders past and present.

Please consider the environment before printing this email.

---

OFFICIAL

OFFICIAL

**From:** Will Weir <[REDACTED]>  
**Sent:** Monday, January 6, 2025 10:39 AM  
**To:** Andrew Lissenden <[REDACTED]>  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) - Independent Environmental Audit

**CAUTION:** This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

NGH have been engaged by the proponent for the abovementioned State Significant Development, to undertake the fourth Independent Environmental Audit, as required by SSD 35999468 (the consent). This Independent Environmental Audit is scheduled to be undertaken shortly on-site.

NGH are therefore seeking to consult with TfNSW generally with regard to compliance matters relevant to the development. NGH will also consult with Shoalhaven City Council.

Should there be any specific environmental issues within the scope of auditing against SSD 35999468 (in addition to those identified in previous consultation) that TfNSW would like NGH to focus on, please return email or phone Will Weir ([REDACTED]) at your earliest convenience.

Look forward to hearing back soon.

Kind regards,



**Will Weir**

Technical Director – Risk & Compliance

m: [REDACTED] p: [REDACTED]

e. [REDACTED]

a. T3, Level 7, 348 Edward St, Brisbane, QLD 4000

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**Consider the environment. Please don't print this e-mail unless really necessary.**

**From:** [Shane Pickering](#)  
**To:** [Will Weir](#)  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) - Independent Environmental Audit  
**Date:** Monday, 6 January 2025 2:48:15 PM  
**Attachments:** [image005.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.jpg](#)

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Hi Will, In response to your enquiry I am only aware of a few complaints from the community regarding the noise from construction activities. These were referred to the State Government/ Enviro Hotline.

Councils Compliance Team also had complaints regarding the hospital construction workers using the local School's parking area.

Otherwise please refer to our previous correspondence of 14 June 2024 requesting that the following issues be considered as part of the audit.

- Compliance against all relevant conditions of consent
- Compliance in all aspects of site controls to prevent, types of construction pollution (air, water, noise and soil pollution).
- Adherence to tree protection zones and/or structural root zones should be included in the audit.
- Dilapidation and adverse impacts on Councils infrastructure.

If you need any further information about this matter please contact Shane Pickering, Acting Manager Environmental Services.

Kind regards



**Shane Pickering**

A/Manager Environmental Services



Bridge Road (PO Box 42) Nowra NSW 2541  
[shoalhaven.nsw.gov.au](http://shoalhaven.nsw.gov.au)



---

**From:** Will Weir <[Will.Weir@shoalhaven.nsw.gov.au](mailto:Will.Weir@shoalhaven.nsw.gov.au)>  
**Sent:** Monday, 6 January 2025 10:40 AM  
**To:** Council Email <[Council@shoalhaven.nsw.gov.au](mailto:Council@shoalhaven.nsw.gov.au)>  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) - Independent Environmental Audit

**EXTERNAL:** Be cautious opening links or attachments.

Good morning,

NGH have been engaged by the proponent for the abovementioned State Significant Development, to undertake the fourth Independent Environmental Audit, as required by SSD 35999468 (the consent). This Independent Environmental Audit is scheduled to be undertaken shortly on-site.

NGH are therefore seeking to consult with Shoalhaven City Council generally with regard to compliance matters relevant to the development. NGH will also consult with TfNSW.

Should there be any specific environmental issues within the scope of auditing against SSD 35999468 (in addition to those identified in previous consultation) that Council would like NGH to focus on, please return email or phone Will Weir ([REDACTED]) at your earliest convenience.

Look forward to hearing back soon.

Kind regards,

**Will Weir**

Technical Director – Risk & Compliance

m: [REDACTED] p: [REDACTED]  
e. [REDACTED]  
a. T3, Level 7, 348 Edward St, Brisbane, QLD 4000  
w. [nghconsulting.com.au](http://nghconsulting.com.au) | [Our commitment to reconciliation](#)



**From:** [Georgia Dragicevic](#)  
**To:** [Will Weir](#)  
**Cc:** [Lorae Phillip](#); [Katrina O'Reilly](#)  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) Independent Audit Input  
**Date:** Wednesday, 8 January 2025 6:52:11 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
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[image005.jpg](#)  
[image006.png](#)

---

Hi Will,

Thank you for consulting the NSW Department of Planning, Housing and Infrastructure on the upcoming IEA for Shoalhaven Hospital Redevelopment. In addition to the consent requirements, please review the management of noise, dust, operating hours, truck movements, erosion and sediment, including dirt tracking onto public roads, community consultation and complaints management.

Thank you kindly,  
Georgia

---

**From:** Will Weir <[\[REDACTED\]](#)>  
**Sent:** Monday, January 6, 2025 10:38 AM  
**To:** DPE PSVC Wollongong Mailbox <[\[REDACTED\]](#)>  
**Subject:** RE: Shoalhaven Hospital Redevelopment (SSD-35999468) Independent Audit Input

Good morning,

NGH have been commissioned by John Holland Group to undertake the fourth Independent Environment Audit for the Shoalhaven Hospital Redevelopment (SSD - 35999468); we plan to attend site on 16 January 2025.

In accordance with Section 3.2 of the Independent Audit Post Approval Requirements (2020), NGH would like to consult with the Department to obtain input into the scope of the audit.

NGH will also contact the NSW Biodiversity, Conservation and Science (BCS), Shoalhaven City Council and Transport for NSW as the approving agencies, for the required management plan documentation for this State Significant Development Project. NGH will also consult with Nowra LALC (previously consulted with no response).

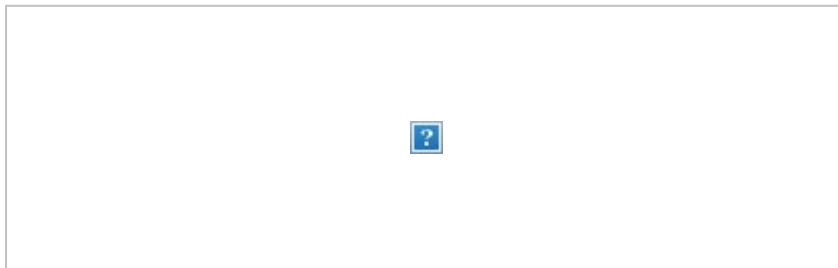
Look forward to hearing back from you soon.

Kind regards,

**Will Weir**  
Technical Director – Risk & Compliance

m: [\[REDACTED\]](#) p: [\[REDACTED\]](#)  
e. [\[REDACTED\]](#)

a. T3, Level 7, 348 Edward St, Brisbane, QLD 4000  
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---

**From:** Will Weir

**Sent:** Friday, 31 May 2024 10:06 AM

**To:** [\[REDACTED\]](#)

**Cc:** [\[REDACTED\]](#)

**Subject:** Shoalhaven Hospital Redevelopment (SSD-35999468) Independent Audit Input

Good morning,

NGH have been commissioned by John Holland Group to undertake the third Independent Environment Audit for the Shoalhaven Hospital Redevelopment (SSD - 35999468); we plan to attend site on 25 July 2024.

In accordance with Section 3.2 of the Independent Audit Post Approval Requirements (2020), NGH would like to consult with the Department to obtain DPHI input into the scope of the audit.

NGH will also contact the Shoalhaven City Council and Transport for NSW as the approving agencies, for the required management plan documentation for this State Significant Development Project. NGH will also consult with Nowra LALC (previously consulted with no response).

In previous consultation undertaken by NGH, the Biodiversity and Conservation Service group (BCS) indicated that they were not aware of any compliance issues relating to the Shoalhaven Hospital re-development (SSD-35999468) which was granted consent on 5th April 2023. However, they offered assistance should and biodiversity/flooding issues arise.

Look forward to hearing back from you soon.

Kind regards,

**Will Weir**

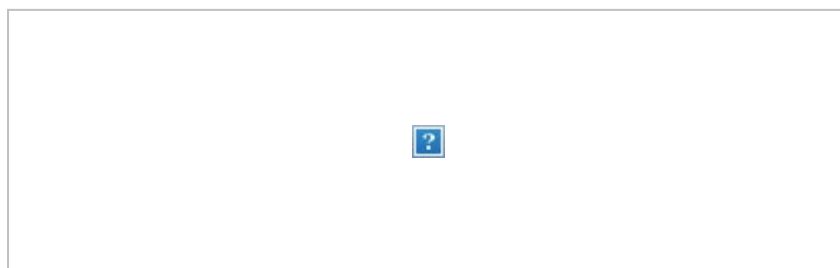
Technical Director, Environmental Management

m: [REDACTED] p: [REDACTED]

e. [REDACTED]

a. T3, Level 7, 348 Edward St, Brisbane, QLD 4000

w. [nghconsulting.com.au](http://nghconsulting.com.au) | [Our commitment to reconciliation](#)



## **Appendix F Site photographs**





Gate 2 – locked, with rumble grid installed for limited use.



Gate 3 – sediment control coir logs and fence



Coir log sediment control at eastern site boundary





Ongoing environmental monitoring station



Main structure work (Level 7 and façade)



Sediment controls at southeastern boundary following significant rainfall event



Internal fitout works,  
noting good  
housekeeping



Temporary sediment  
controls at Gate 4,  
installed following  
significant rainfall  
event



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