

Prepared for John Holland Group

# Independent Environmental Audit

## Shoalhaven Hospital Redevelopment – SSD 35999468

Shoalhaven NSW

August 2023

Project Number: 230085

## Document verification

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## Acronyms and Abbreviations

CoC	Conditions of Consent
CNVMPSP	Construction Noise and Vibration Management Sub-plan
CTPMSP	Construction Traffic and Pedestrian Management Sub-plan
CWMSP	Construction Waste Management Sub-plan
DPE	Department of Planning and Environment (NSW)
DPIE	Department of Planning, Industry and Environment (NSW)
EIS	Environmental impact statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
ha	hectares
IEA	Independent Environmental Audit
EIS	Environmental Impact Statement
JHG	John Holland Group
km	kilometres
m	metres
MOD	Modification to Conditions of Consent
NGH	NGH Pty Ltd
NSW	New South Wales
OEH	Office of Environment and Heritage (NSW), now EES
SSD	State Significant Development

## **Executive summary**

NGH Pty Ltd (NGH) was engaged by John Holland Group (JHG) to undertake the initial (12-week) 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) 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.

The audit period for this IEA was from construction commencement until 3<sup>rd</sup> August 2023. The audit scope was developed by reviewing the 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 prior to the site component of the audit with further request for information following the site inspection.

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.

Complaints received over the auditing period included one noise complaint and one dust complaint. Both complaints were actively investigated and were reported to have been addressed to the satisfaction of the nearby residents.

There were no reportable environmental incidents for the audit period.

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.

Site interviews occurred with the Site Manager, Senior Project Engineer 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.

The key strength of this project is the observed commitment to implementation of the environmental management plans as evident in the site inspection and discussions with key personnel.

# 1. Introduction

NGH Pty Ltd (NGH) was engaged by John Holland Group (JHG) to undertake the initial (12-week) 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 and Environment (DPE) Conditions of Consent (CoC) for State Significant Development (SSD) 35999468, inclusive of Modification (MOD) 1.

The CoC requires that an initial IEA is undertaken within 12 weeks of construction commencement, 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 Department of Planning and Environment (DPE) and State Significant Development (SSD) consent for the redevelopment was approved by the DPE on 5 April 2023 (SSD 35999468). Following this, a modification to SSD 35999468 (MOD 1) was requested and subsequently approved by the DPE to allow for the re-numbering of condition B30. Consolidated conditions of consent were issued to JHG by DPE on 8 June 2023.

## 1.2. Purpose

The audit period considered in this IEA was from construction commencement until 3 August 2023. 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 Independent Audit was to assess compliance with Consolidated Conditions of Consent (referred to hereafter as Consolidated Consent) and implementation of applicable management plans.

### 1.3.1. Audit scope and period

The scope of the audit will include:

- 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 commencement up until 3<sup>rd</sup> August 2023.

### 1.4. 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 Will Weir as the Independent Auditor for this project and provided Will's CV and independence declaration to DPE on 25 July 2023 (refer Appendix C). Will was approved by DPE as the Independent Auditor on the 27 July 2023 (refer Appendix D).

The audit team comprised these members:

- Will Weir – Lead Auditor
- Olivia Merrick – Support Auditor
- Natascha Aren – Technical and QA Review



## **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 3 August 2023 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).

An Opening Meeting was held on 3 August 2023 at 08:30am.

Present at the opening meeting were:

- Richard Ingall (Senior Project Engineer, JHG)
- Chris Sikes (Site Manager, JHG)
- Ronnie O’Neill (Safety Manager, JHG)
- Judie Francis (Trainee)
- David Wood (Project Manager, Johnstaff)
- Will Weir (Auditor, NGH)

A site inspection debrief was held at site and a Closing Meeting 3 August 2023 at 16:00.

Present at the Closing Meeting were:

- Richard Ingall (Senior Project Engineer, JHG)
- Chris Sikes (Site Manager, JHG)
- Ronnie O’Neill (Safety Manager, JHG)
- Judie Francis (Trainee)
- David Wood (Project Manager, Johnstaff)
- Gilda Barakat (Project Director, Johnstaff)
- Jeremy Hart (Project Director, Health Infrastructure)
- Heath van Baselom (Project Engineer)
- 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 (3 August 2023) to gather evidence during offsite document review including:

- Richard Ingall (Senior Project Engineer, JHG)
- Chris Sikes (Site Manager, JHG)
- Ronnie O’Neill (Safety 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:

- NSW Department of Planning and Environment (DPE);
- Transport for New South Wales (TfNSW); and
- Shoalhaven Council (BSC)

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/>
- 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
- May to July 2023 JHG Nowra (002) - Waste Tracking Spreadsheet
- SDMH - Material Tracking Register
- Letter - Shoalhaven Hospital Redevelopment (SSD 35999468) Independent Auditor 2023 - DPE, dated 27/07/2023

### Reports and plans

- Shoalhaven Hospital Redevelopment SDMH - Staging Report - SSD-35999468, dated 11 May 2023
- Shoalhaven District Memorial Hospital DILAPIDATION REPORT, 21 February 2023
- Construction Environmental Management Plan (CEMP) rev 01, dated 18 May 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
- Aboriginal Cultural Heritage Assessment Report (ACHAR), dated 27 June 2022
- EIS

### 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
- 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

## 3.1. Compliance performance

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 (refer Section 3.5 below for more detail on management plan implementation).

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

Condition Part	Compliant	Non-Compliances	Not triggered
Part A (31)	17	3	11
Part B (39)	19	2	18
Part C (41)	29	-	12
Part D (29)	-	-	29
Part E (18)	-	-	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.

### 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

Five (5) non-compliances were raised in this audit against the conditions of consent (35999468). Refer Table 3-2 below for more detail.

Note: In relation to the tally for Table 3-2, 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.

Where the identified non-compliance is relevant to details contained within a specific management plan, this is further described within table 3-3 overleaf. Suggested management actions have also been attributed to each identified non-compliance.

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

#	Assessment requirement	Comment	Audit classification	Response/ Action
<b>Part A</b>				
A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	The audit found NC's against Consent Conditions as below, therefore the development has not been carried out in accordance with the full conditions of consent	NC	Complete actions listed below
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 A23, B1, B17 and C1 where the audit found administrative non-compliance findings with prescribed conditions of development consent.	NC	Complete actions listed below
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) publicly available on its website:  (i) documents referred to in condition A2 of this consent. (ii) all current statutory approvals for the development. (iii) all approved strategies, plans and programs required under the conditions of this consent (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any	The requirements listed A23 (a) (i), (ii), (iii), (iv), (v), (vii), (viii), were not found on the applicants website at the time of the audit site inspection.	NC	The Applicant is to update the website in accordance with the requirement of this Condition.

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#	Assessment requirement	Comment	Audit classification	Response/ Action
	<p>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 ny approved plans and programs</p> <p>(vii) contact details to enquire about the development or to make a complaint</p> <p>(viii) a complaints register, updated monthly</p>			
<b>Part B</b>				
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	<p>The notification letter dated 3rd May 2023 indicated that construction works were planned to commence on the 15th May 2023. The Aconex Transmittal submitting the notification letter to the Planning Secretary was however, dated 22 May 2023 (i.e. one week after the intended construction commencement date). Therefore the Project was non-compliant with this condition.</p> <p>It is noted however that work did not actually commence until 30th May 2023, and as such no corrective action is required.</p>	NC	No further action
B17	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	(iii) Section 7.7. of the CEMP references Environmental Control Plans to contain primary environmental constraints including location of offices. The listed Environmental	NC	The applicant is to update the CEMP to include all requirements of this condition in relation to

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#	Assessment requirement	Comment	Audit classification	Response/ Action
	<p>following:</p> <p>(iii) temporary site office arrangement</p> <p>(vii) groundwater management plan including measures to prevent groundwater contamination;</p>	<p>Controls Plans and subplans don't detail temporary site office arrangements.</p> <p>Layout and location of the site offices is shown in Figures 3.1 and 3.2 of the CTPMP (referred to as "site sheds"), and in Figure 2 of the CNVMP (not named), however in both cases the details on the plans are not legible. The Staging Plan shows a rendering of the office arrangements however provides no detail as to the makeup of the office arrangements. Notwithstanding, the Staging Report is not a management plan under the CEMP. It's not clear that the Staging Report and management plan figures are aligned.</p> <p>(vii) The CEMP reviewed at the time of audit, did not include a groundwater management plan.</p>		<p>office arrangements and groundwater management.</p>

### **3.4. Previous audit follow-up**

This is the first (initial 12-week) audit of the Project.

### **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 audit site inspection, and compliance with the CEMP was observed to be checked via regular inspections. The audit found that actions were being tracked through to close out.

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

- Deliveries of materials, plant and equipment
- Sewer Pump-out
- Inspection and upgrade of Erosion and Sediment Controls for upcoming rainfall event
- Demolition Waste Removal - old Childcare Centre
- BOC Roadway and concrete works
- Earthworks

The CEMP does not contain the required detail as per Condition 17, and therefore should be updated to include all requirements of this Condition (refer to table 3.2 above).

#### **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. As the project develops, additional off-street parking will need to be secured, which JHG are actively pursuing.

#### **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 to the newly established childcare centre
- Works within nominated operating hours



### **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 licensed facilities as required, including appropriate removal of asbestos waste material.

### **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.

Ongoing environmental monitoring for the early stages of the development involves ongoing site inspections.

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 does contain some community fact sheets and news items in relation to the progress of the development. However, much of the information required to be published on the website (refer condition A23) was not present on the website at the time of reporting .

The website lists details of who to contact within the business, however it is not immediately evident how to lodge a complaint when viewing the website. Adding detail on who to contact within the business for information and/ or to lodge a complaint, is recommended.

## **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.

## **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 July 2023 during the preparatory phase of the IEA with DPE, TfNSW and Shoalhaven Council, 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, as below:

- Transport for New South Wales (TfNSW):
  - No specific environmental issues that TfNSW would like the audit to focus on at this time, noting that comment had been provided previously (2 May 2023) by TfNSW to the Proponent with regard to the Construction Traffic and Pedestrian Management Sub-Plan
  - **IEA response:** The CTPMSP reviewed during the audit, appeared to have been updated to address TfNSW comments, addressing the concerns raised by TfNSW. Liaison with

Shoalhaven City Council regarding traffic and transport related issues was also noted in the revision of the CTPMSP.

- Department of Environment and Planning (DPE):
  - In addition to the consent requirements, the management of noise, dust, operating hours, truck movements, erosion and sediment, including dirt tracking onto public roads, community consultation and complaints management was highlighted by the Department as focus areas for this audit.
  - **IEA response:** the redevelopment was noted as compliant at the time of audit, with Consent Conditions relevant to management of noise, dust, operating hours, truck movements, erosion and sediment (including dirt tracking onto public roads) community consultation and complaints management.

### 3.8. Complaints

A review of the complaints registers found that there had been two complaints recorded in the audit period, including:

- One noise complaint – likely caused by an operating water cart
- One dust complaint - North Street access.

Both complaints were actively investigated and were reported to have been addressed to the satisfaction of the nearby residents.

### 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.

### 3.11. Site inspection

The site inspection found the site to be generally well managed. There were some minor observations made in the site walkover in relation site signage, and for protection of an existing stormwater drain, noting at this stage of the development things are dynamic, changing as areas are actively worked. Outside of this, key environmental controls appeared well maintained:

- Drainage controls in place and operating effectively
- Erosion and sediment controls were in place and maintained
- Waste management including waste separation and appropriate disposal of waste
- Waste oil disposal adequate
- Spill kits adequately stocked and sufficiently placed
- Hazardous material storage and segregation
- Plant and Equipment inspection and maintenance regime
- Clearly delineated site boundaries and No Go zones
- Tree Protection Zones established and maintained.

Representative site photographs are provided in Appendix F.

### **3.12. Site Interviews**

Site interviews occurred with the Site Manager, Senior Project Engineer 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. Overall, the site appeared to be well managed, noting that as the development progresses, management attention should be maintained with regard to housekeeping, waste management and storage of hazardous chemicals.

It was noted during the site inspection component of the audit, that handwritten hours of operation were added to the signage. It is therefore recommended that John Holland upgrade the signage to include printed text (as opposed to hand written) 'approved hours of work'.

It is also recommended that John Holland ensure that a professional engineer (as defined in the National Construction Code) updates the Civil Design Certificate (Construction Certificate 2) to expressly state that compliance with 'Condition B32' has been achieved.

### **3.14. Key Strengths**

The key strength of this project is a commitment to implementing environmental management mitigation measures, as evidenced during in the site inspection and discussions with key personnel.

## **4. Recommendations**

Non-compliances are summarised below. Section 3.13 above includes opportunities for improvement, which should also be considered recommendations.

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

Five (5) non-compliances were raised against Consent conditions (SSD 35999468). Overall, compliance was achieved with the audit documents that were reviewed. The number of non-conformances with the statutory conditions is summarised in Conclusion

The audit found five (5) non-compliances 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.

Table 5-1 Tally of audit findings

below:

## Independent Environmental Audit

Shoalhaven Hospital Redevelopment – SSD 35999468



Table 4-1 Summary of non-compliances (SSD 35999468)

#	Assessment requirement	Comment	Audit classification	Response/ Action
<b>Part A</b>				
A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	The audit found NC's against Consent Conditions as below, therefore the development has not been carried out in accordance with the full conditions of consent	NC	Complete actions listed below
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 A23, B1, B17 and C1 where the audit found administrative non-compliance finding with prescribed conditions of development consent.	NC	Complete actions listed below
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) publicly available on its website:  (i) documents referred to in condition A2 of this consent. (ii) all current statutory approvals for the development. (iii) all approved strategies, plans and programs required under the conditions of this consent (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any	The requirements listed A23 (a) (i), (ii), (iii), (iv), (v), (vii), (viii), were not found on the applicants website:	NC	The Applicant is to update the website in accordance with the requirement of this Condition.

## Independent Environmental Audit

Shoalhaven Hospital Redevelopment – SSD 35999468



#	Assessment requirement	Comment	Audit classification	Response/ Action
	<p>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 ny approved plans and programs</p> <p>(vii) contact details to enquire about the development or to make a complaint</p> <p>(viii) a complaints register, updated monthly</p>			
<b>Part B</b>				
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	<p>The notification letter dated 3rd May 2023 indicated that construction works were planned to commence on the 15th May 2023. The Aconex Transmittal submitting the notification letter to the Planning Secretary was however, dated 22 May 2023 (ie one week after the intended construction commencement date). Therefore the Project was non-compliant with this condition.</p> <p>It is noted however that work did not actually commence until 30th May 2023, and as such no corrective action is required.</p>	NC	No further action
B17	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:	(iii) Section 7.7. of the CEMP references Environmental Control Plans to contain primary environmental constraints including location of offices. The listed Environmental Controls Plans and subplans don't detail	NC	The applicant is to update the CEMP to include all requirements of this condition.

## Independent Environmental Audit

Shoalhaven Hospital Redevelopment – SSD 35999468



#	Assessment requirement	Comment	Audit classification	Response/ Action
	<p>(iii) temporary site office arrangement</p> <p>(vii) groundwater management plan including measures to prevent groundwater contamination;</p>	<p>temporary site office arrangements.</p> <p>Layout and location of the site offices is shown in Figures 3.1 and 3.2 of the CTPMP (referred to as “site sheds”), and in Figure 2 of the CNVMP (not named), however in both cases the details on the plans are not legible. The Staging Plan shows a rendering of the office arrangements however provides no detail as to the makeup of the office arrangements. Notwithstanding, the Staging Report is not a management plan under the CEMP. It’s not clear the Staging Report and management plan figures are aligned.</p> <p>(vii) The CEMP reviewed at the time of audit, did not include a groundwater management plan.</p>		

## 5. Conclusion

The audit found five (5) non-compliances 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.

Table 5-1 Tally of audit findings

Condition Part	Compliant	Non-Compliances	Not triggered
Part A (31)	17	3	11
Part B (39)	19	2	18
Part C (41)	29	-	12
Part D (29)	-	-	29
Part E (18)	-	-	18



# Appendix A Audit Table

**Development Consent Compliance Status - August 2023**

Reference	Approval or licence requirement	Evidence collected	Audit Finding	Compliance status	Action Reference																																																																
<b>Development Consent (SSD 35999468)</b>																																																																					
<b>Schedule 2</b>																																																																					
<b>PART A - Administrative Conditions</b>																																																																					
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	The Project site was observed by the auditor to be well managed at the time of the audit and not considered to present a potential risk of causing material harm to the environment.	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>(d) in accordance with the approved plans in the table below:</p> <table border="1"> <thead> <tr> <th colspan="4">Architectural Plans prepared by Conrad Gargett</th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>PRJ-TD-DR-AR-SK00003</td> <td>2</td> <td>Proposed Site Plan</td> <td>02/09/22</td> </tr> <tr> <td>RJ-TD-DR-AR-SK00002</td> <td>2</td> <td>Public Place Proposed Site Plan</td> <td>02/09/22</td> </tr> <tr> <td>PRJ-TD-DR-AR-00005</td> <td>5</td> <td>Site Demolition</td> <td>26/08/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00004</td> <td>2</td> <td>Level 0 Overall Plan</td> <td>10/11/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00005</td> <td>2</td> <td>Level 1 Overall Plan</td> <td>10/11/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00006</td> <td>1</td> <td>Level 2 Overall Plan</td> <td>02/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00007</td> <td>1</td> <td>Level 2 Link Plan</td> <td>02/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00008</td> <td>2</td> <td>Level 3 Overall Plan</td> <td>21/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00009</td> <td>2</td> <td>Level 4 Overall Plan</td> <td>21/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00010</td> <td>2</td> <td>Level 5 Overall Plan</td> <td>21/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00011</td> <td>1</td> <td>Level 6 Overall Plan</td> <td>02/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00012</td> <td>1</td> <td>Level 7 Overall Plan</td> <td>02/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00013</td> <td>1</td> <td>Level 8 Overall Plan</td> <td>02/09/22</td> </tr> <tr> <td>ASB-TD-DR-AR-SK00014</td> <td>2</td> <td>Detailed External Elevation – North Part 1</td> <td>Undated/ Date 55</td> </tr> </tbody> </table>	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	<p>Site inspection</p> <p>Document review Interview: R Ingall</p> <p>Site inspection</p> <p>Document review BCA Crown Certificate - 1 (CC1), CRO-23037, 30 May 2023</p> <p>BCA Crown Certificate - 2 (CC2), CRO-23063 (CC1), 24 July 2023</p> <p>Site inspection</p> <p>Document review</p>	<p>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. At the time of audit, no such written directions had been received.</p> <p>Works were being delivered generally in accordance with these requirements.</p> <p>Works were being delivered in accordance with the relevant approved plans at the time of the first audit.</p>	Non-compliant	
Architectural Plans prepared by Conrad Gargett																																																																					
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A2

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-30001	8	External Elevations – North and East	22/08/22
ASB-TD-DR-AR-30002	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-35001	8	Sections	22/08/22
ASB-TD-DR-AR-35002	7	Sections	22/08/22
ASB-TD-DR-AR-35003	3	Sections – Link Bridge	22/08/22
<b>Landscape Plans prepared by Site Image</b>			
<b>Dwg No.</b>	<b>Rev</b>	<b>Name of Plan</b>	<b>Date</b>
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

A3

Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:

(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;

any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and

the implementation of any actions or measures contained in any such document referred to in (a) above.

Noted

Noted

Compliant

A4	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.	Noted	Noted	Compliant	
A5	This consent lapses five years after the date of consent unless work is physically commenced.	John Holland - Notification Letter, dated 3.05.23	Construction works commenced on 15th May 2023.	Not triggered	
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation.	Document Review Site inspection Interviews	Refer conditions A23, B1, B17 and C1 where the audit found administrative non-compliance finding with prescribed conditions of development consent.	Non-compliant	
A7	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.	Interview - R. Ingall	No disputes reported at the time of the first audit inspection.	Not triggered	
A8	Where conditions of this consent require consultation with an identified party, the Applicant must:  (a) consult with the relevant party prior to submitting the subject document for information or approval; and (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.	Document Review  Interview: R Ingall	The audit found that consultation had been adequately undertaken.	Compliant	
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  Evidence of staging report issue -email dated 8 February 2023 4:23:00 PM	The Staging Report was prepared and an updated version submitted to the Certifier on 8 February 2023.	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, dated 11 May 2023	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 audit inspection works were being delivered in accordance with Stage 1 early Stage 2 activities 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		Compliant	
	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);	Noted		Compliant	

A13	(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  (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)				
A14	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	
A15	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	
A16	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 CC1, CC2	The works at the time of the audit were generally being delivered in accordance with the current management plans and strategies.	Compliant	
A17	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>	CC1 CC2	The Certifier confirmed that works under CC1 and CC2 were designed in accordance with the BCA 2020.	Compliant	
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	As above	Not triggered for the early stages of the development under CC1 and CC2	Not triggered	
A19	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 colour/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	Not triggered	
A20	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	CC1 CC2 <i>Interview: R Ingnall</i>		Compliant	
A21	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	<i>Interview: R Ingnall</i>	No changes identified up to the time of the first audit inspection.	Not triggered	

A22	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&amp;A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	Noted	Noted	Compliant	
A23	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained, approved or provided) publicly available on its website:</p> <p>(i) the documents referred to in condition A2 of this consent</p> <p>(ii) all current statutory approvals for the development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this</p> <p>(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs:</p> <p>(vi) a summary of the current stage and progress of the development;</p> <p>(vii) contact details to enquire about the development or to make a complaint;</p> <p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the 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><a href="https://shoalhavenredevelopment.health.nsw.gov.au/">https://shoalhavenredevelopment.health.nsw.gov.au/</a></p>	<p>Not found on the Applicants website.</p> <p>Not found on the Applicants website.</p> <p>Not found on the Applicants website.</p> <p>Not found on the Applicants website.</p> <p>Not found on the Applicants website.</p> <p>Newsletters up to April 2023 and News including a 22 June 2023 presentation of the project timeline is provided on the website.</p> <p>A "Contact Us" page does contain an on-line enquiry form, HI email address and a number for media enquiries. It does not expressly provide a complaints line.</p> <p>Not found on website.</p> <p>Not yet triggered.</p> <p>No other matters identified.</p> <p>Most of the requisite information is not currently being kept up to date on the website.</p>	Non-compliant	
A24	<p>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>	<p>Interview R Ingall, R O'Neill</p> <p>Shoalhaven Hospital - Re-development Project Induction</p>	<p>The Project Induction adequately details the relevant environmental management and c The auditor sighted a sample of induction record on screen during the audit inspection. The audit sighted induction and training records on-screen during the audit inspection.</p>	Compliant	
A25	<p>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</p>	Interview R Ingall, R O'Neill	No environmental incidents reported during the audit period.	Not triggered	
A26	<p>Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.</p>		A above	Not triggered	
A27	<p>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, R O'Neill	No known non-compliance matters to be reported during the audit period.	Not triggered	

A28	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	Not triggered	
A29	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted	Noted	Compliant	
A30	Within three months of: (a) the submission of an incident report under condition A26 (b) the submission of an Independent Audit under condition C39 or C41; (c) the approval of any modification of the conditions of this consent; or (d) the issue of a direction of the Planning Secretary under condition A3 which requires a review. 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.			Not triggered	
A31	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. <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>			Not triggered	
<b>PART B - Prior to Commencement of Construction</b>					
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.	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  Interview - R Ingall	The notification letter dated 3rd May 2023 indicated that construction works were planned to commence on the 15th May 2023. The Aconex Transmittal submitting the notification letter to the Planning Secretary, was however, dated 22 May 2023. Therefore the Project was non-compliant with this condition. It is noted however that work did not actually commence until 30th May 2023, and as such no corrective action is required.	Non-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.	John Holland - Notification Letter dated 31/05/23  DPE Letter re; B2, dated 7 July 2023	Stage 2 early works were notified in accordance with this condition.	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.	CC1, CC2	Structural drawings were provided to the Certifier for the early stages of work for approval of CC1 and CC2.	Compliant	
B4	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.	Interview: R Ingall	Not triggered at the time of the audit.	Not triggered	
	Prior to the commencement of construction, the Applicant must:			Compliant	

B5	<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 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 14/05/2023</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 first audit inspection</p>		
B6	<p>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>	<p>Letter - Project reference: SHOALHAVEN HOSPITAL, Job No: 130247, DIPAPIDATION REPORTS EXTENT</p> <p>Interview: R Ingalls</p>	<p>Surrounding properties are reported not likely to be affected by the construction works.</p>	Not triggered	
B7	<p>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.</p>		<p>As above - no offers required.</p>	Not triggered	
B8	<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</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>	<p>Letter - Project reference: SHOALHAVEN HOSPITAL, Job No: 130247, DIPAPIDATION REPORTS EXTENT</p>		Not triggered	
B9	<p>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</p>	<p>Letter - Statement of Compliance to ESD SSSA Conditions, Ref. No. 207163, day May 5th, 2023</p>	<p>Sustainability consultant confirmed that ESD were incorporated into design.</p>	Compliant	
B10	<p>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.</p>	<p>As above</p>	<p>The project attained 66 points in accordance with the ESD Evaluation Tool</p>	Compliant	
B11	<p>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</p>			Not triggered	
B12	<p>Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The 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.</p>	<p>Letter - Statement of Compliance Shoalhaven Hospital Demolition Work Plan, dated 14th May 2023</p> <p>CC1</p>	<p>The Demolition Work Plan are stated to meet the requirements of this condition as accepted by the Certifier and submitted to the Secretary with CC1.</p>	Compliant	
B13	<p>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.</p>	<p>Interview: R Ingall</p>		Not triggered	



B14	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.	Interview: R Ingal	Not yet triggered.	Not triggered	
B15	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.	As above	As above	Not triggered	
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	
B17	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: (a) Details of: (i) hours of work;  (ii) 24-hour contact details of site manager;  (iii) temporary site office arrangement;  (iv) management of dust and odour to protect the amenity of the neighbourhood;  (v) stormwater control and discharge; (vi) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;  (vii) groundwater management plan including measures to prevent groundwater contamination;  (viii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	Construction Environmental Management Plan (CEMP) rev 01, dated 18 May 2023	<p>The CEMP was not published on the Applicant's website at the time of the first audit inspection.</p> <p>Section 7.7. references Environmental Control Plans, that will detail working hours. The CNVMP (Environmental Control Plan) adequately addresses the requirements of this condition. Section 5.5.1 includes the contact details of site manager.</p> <p>Section 7.7. of the CEMP references Environmental Control Plans to contain primary environmental constraints including location of offices. The listed Environmental Controls Plans and subplans don't appear to detail temporary site office arrangements.</p> <p>Layout and location of the site offices is shown in Figures 3.1 and 3.2 of the CTPMP (referred to as "site sheds"), and in Figure 2 of the CNVMP (not named), however in both cases the details on the plans are not legible. The Staging Plan appears to show a rendering of the office arrangements, but provides no detail as to the makeup of the office arrangements. Notwithstanding, the Staging Report is not a management plan under the CEMP. It's not clear the Staging Report and management plan figures are</p> <p>Section 7.2 states that works to be conducted to minimise dust generation and any other air quality impacts as a result of construction activities.</p> <p>Appendix 5: Unexpected Finds Protocol addresses potential observed odours associated with contaminants and wastes, and provides a flow chart for identifying management steps to be undertaken, if odours are present. Section 7.1 contains the requirements of this condition Section 7.1 contains the requirements of this condition</p> <p>The CEMP does not include a groundwater management plan.</p> <p>Section 7.5 adequately addresses construction lighting.</p>	Non-compliant	

	<p>(b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;</p> <p>(c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;</p> <p>(d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B18);</p> <p>(e) Construction Noise and Vibration Management Sub-Plan (see condition B19);</p> <p>(f) Construction Waste Management Sub-Plan (see condition B20);</p>		<p>Appendix 5: Unexpected Finds Protocol</p> <p>Appendix 6: Unexpected Finds Protocol - Heritage</p> <p>Appendix 4: Environmental Control Plans - Construction Traffic and Pedestrian Management Plan (JHG-SHR-PM-PL-99-XX021)</p> <p>Appendix 4: Environmental Control Plans - Construction Noise and Vibration Management Plan (JHG-SHR-PM-PL-99-XX012)</p> <p>Appendix 4: Environmental Control Plans - Construction Waste Management Sub-Plan (JHG-SHR-PM-PL-99-XX013)</p>		
<b>B18</b>	<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</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>	<p>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), prepared by TTW, dated 10 May 2023</p>	<p>The CTPMSP was prepared by TTW (NSW), Traffic Engineering capabilities Detailed within Section 1.3 of the CTPMSP</p> <p>Adequately addressed in Sections 5.0 and 5.3 of the CTPMSP</p> <p>Adequately addressed in Sections 5.0 and 5.4 of the CTPMSP</p> <p>Adequately addressed in Sections 4.3 and 4.4 of the CTPMSP</p> <p>Adequately addressed Appendix A of the CTPMSP</p> <p>Adequately address in Sections 4.4 of the CTPMSP</p> <p>Adequately address in Sections 3.2</p>	Compliant	
<b>B19</b>	<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> <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>Construction Noise and Vibration Management Sub-Plan (CNVMSP) prepared by Acoustic Logic (2 May 2023), Rev 0</p>	<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 CNVMSP and Appendix C, which lists the consultation outcomes</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>	Compliant	
<b>B20</b>	<p>The Construction Waste Management Sub-Plan (CWMSWP) 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>Construction Waste Management Plan (CWMP), Rev 01, dated 18/05/2023</p>	<p>Addressed in Section 7 and Section 8 of the CWMP</p>	Compliant	

	(b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.		Addressed in Section 6 of the CWMP As above		
B21	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: (a) minimise the impacts of earthworks and construction on the local and regional road network; (b) minimise conflicts with other road users; (c) minimise road traffic noise; and (d) ensure truck drivers use specified routes.	CTPMSP	Addressed in Section 4.6 of CTPMP  As above As above Figure 4.2 CTPMP addresses truck routes.	Compliant	
B22	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.	CTPMSP  Shoalhaven District Memorial Hospital Redevelopment Construction Worker Parking Confirmation for Work Phase CC2, dated 6 July 2023	Section 5.2 of the CTPMSP outlines parking arrangements for the project early phases of the development. The CTPMSP is to be updated for the civil works phase to confirm adequate parking arrangements for the larger workforce.  The parking confirmation for CC2 provides for adequate off-street parking.	Compliant	
B23	Prior to the commencement of construction, the Applicant must: (a) install erosion and sediment controls on the site to manage wet weather events; and (b) divert existing clean surface water around operational areas of the site.	Statement of Compliance Erosion and Sediment Control, Delta Pty Ltd, dated 14 May 2023  Audit site inspection	Statement of Compliance confirms compliance for Stage 1 works and main works (ASB).  Erosion and sediment controls observed during audit site inspection for the early phase earth works included sediment fence for soil stockpiles and down hydraulic gradient boundaries, coir logs and geofabric at existing stormwater drains, and clean water diversion. The main site access included gravel cover and a rumble grid. No significant tracking of material off-site was observed.	Compliant	
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 Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.	As above	As above.  Erosion and sediment controls observed during the audit site inspection, as above, appeared to be implemented in general accordance with the 'Blue Book'.	Compliant	
B25	Prior to installation of mechanical plant and equipment: (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 (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.	SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35999468, dated 11 May 2023  Interview: R Ingall	Not triggered at the time of the audit.	Not triggered	
B26	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: (a) all vehicles must enter and leave the site in a forward direction;  (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 (c) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, has been addressed.	CTPMSP  CC1, CC2  Interview: R Ingall  Audit site inspection	Adequately addressed in Sections 4.4 of the CTPMSP  Vehicle access points observed and vehicles leaving and entering site in a forward direction only. Adequately addressed Appendix A of the CTPMSP  Adequately addressed in Sections 5.0 and 5.3 of the CTPMSP.  Shared access points were observed to be actively managed at the time of the audit site inspection, including signage and traffic and access control personnel in place.	Compliant	

B27	<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> <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>Shoalhaven District Memorial Hospital Redevelopment Construction Worker Parking Confirmation for Work Phase CC2. dated 6 July 2023</p>	<p>Section 5.2 of the CTPMSP outlines parking arrangements for the project early phases of the development. The CTPMSP is to be updated for the civil works phase to confirm adequate parking arrangements for the larger workforce in line with the project starting Adequately addressed Appendix A of the CTPMSP.</p>	Compliant	
B28	<p>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.</p>	<p>Shoalhaven City Council - Consent for Works and/or Structures in a Public Road - Temporary Site Access Only, 3rd May 2023</p>	<p>No footpath or public domain works other than approved site access arrangements at the time of the audit inspection.</p>	Compliant	
B29	<p>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.</p>	<p>CC1, CC2</p>	<p>Not yet considered by the Certifier as relevant to the building design still underway prior to the building construction stage of the development.</p>	Not triggered	
B30	<p>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>	<p>ARBORICULTURAL DEVELOPMENT IMPACT AND TREE PROTECTION REPORT, dated 18 July 2022 CC1</p>	<p>Not yet triggered as footpath not under construction.  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.  <del>No consultation with the arborist required to date.</del></p>	Not triggered	
B31	<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 CC2</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>	Compliant	
B32	<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 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.</p>	<p>As above</p>	<p>Condition deemed compliant based on above note. The certification does not specifically reference this condition. The certifier should confirm compliance with B32 and close out.</p>	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 minimum 210kL 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>SHOALHAVEN HOSPITAL REDEVELOPMENT SDMH - Staging Report - SSD-35+C165:C168999468, dated 11 May 2023 CC1, CC2</p>	<p>Not triggered for early stage of development.</p>	Not triggered	

	<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>				
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>CC1, CC2</p>	As above	Not triggered	
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> <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>	As above	As above	Not triggered	
B36	<p>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.</p>	As above	As above	Not triggered	
B37	<p>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.</p>	As above	As above	Not triggered	
B38	<p>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>	As above	Works not yet undertaken at the time of the first	Not triggered	

B39	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.	As above		Not triggered	
<b>PART C - During Construction</b>					
C1	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: (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;  (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; (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  (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.	Site Notices	The site notice(s) are appropriately dimensioned.  The site notice(s) appear to be made of durable material  All required aspects were present on the site notices with the exception of the approved hours of work at the time of the first audit inspection. This was temporarily rectified on the same day as the audit site inspection. Opportunity for improvement - upgrade the signage to include printed text (as opposed to hand written) approved hours of work The site notice (s) were appropriately mounted on the perimeter fencing near the main access points.	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 maintains 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 auditor sighted on screen records, and plant and equipment on site demonstrating implementation of the inspection and maintenance regime. 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	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	The auditor was advised that deliveries undertaken in accordance within the stipulated hours to-date of the audit site inspection.	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	Refer 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	As above	Refer above.	Not triggered	

	(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				
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.	As above	No out of hours work had been undertaken up the time of the first audit site inspection.	Not triggered	
C8	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 hour up to the time of the first site audit inspection.	Not triggered	
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).		The works were being delivered generally in accordance with the CEMP and Sub-plans at the time of the first audit site inspection.	Compliant	
C10	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.	Compliant	
C11	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 in place around the main construction areas, including a noise barrier rated for the adjoining newly constructed and operational Childrens Daycare Centre.  The auditor noted that temporary fencing provider advertising could be observed through the transparent Health Infrastructure hoarding. While not specifically considered non-compliant with this condition, the Primary Contractor elected to remove the advertising No graffiti was observed on the hoarding.	Compliant	
C12	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 first audit site inspection.	Compliant	
C13	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.	CNVMSPP Site inspection Interview: R Ingall  Shoalhaven Hospital Redevelopment Complaints Register	Adequately addressed in the CNVMSP. The development was being undertaken within the stipulated hours of operation up until the time of the first audit inspection. The CNVMSP was being implemented at the time of the first site audit inspection.  One complaint had been received in relation to sporadic noise up to the time of the first audit site inspection. This was considered to possibly be caused by the water cart operating. This had been adequately investigated and closed out with the resident.	Compliant	
C14	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.	CTPMSP Interview: R. Ingall	Addressed in the CTPMSP and Driver Code of Conduct.  No reported instances of non-compliance with the requirement at the time of the first audit site inspection.	Compliant	
C15	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.	As above Site inspection	Quackers heard to be actively used on site during the first audit site inspection.	Compliant	
C16	Vibration caused by construction at any residence or structure outside the site must be limited to:  (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 (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).	CNVMSPP Interview: R. Inaall	Addressed in the CNVMSP	Compliant	
C17	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 first audit site inspection.	Compliant	

C18	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	
C19	For the duration of the construction works: (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; (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; (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 (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.	Interview: R Ingall Site Inspection  Noted	Trees only removed as approved by the development.  Street trees were observed to be protected around the trunk and are outside of the fenced construction zone.  On-site trees identified to be kept were observed to be fences off and clearly identified as being for protection.  No requirement to access up to date of the audit site inspection.	Compliant	
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	CEMP Site Inspection Interview: R Ingall Shoalhaven Hospital Redevelopment Complaints Register	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 active civil earthworks underway during the audit site inspection.  One complaint was received with regard to increased in he vicinity of North Street driveway. Water carts were deployed to address this concern to the satisfaction of the resident.	Compliant	
C21	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	CEMP Site Inspection Interview: R Ingall	Refer above.  Spoil and waste material loads are required to be covered. Rumble grid and gravel driveway in place. No obvious sign of material tracking off-site were observed by the auditor. Public roads in the vicinity of the development were observed to be clean and not impacted by the project. The early civil work were not at a stage to require stabilisation at the time of the audit inspection.	Compliant	
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 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'.	Site Inspection	The ESCMP was being adequately implemented at the time of the audit inspection.	Compliant	
C23	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	
C24	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	Stormwater retention pond in place with water expected to be used for dust suppression. Stormwater drains down gradient of the site include sediment controls.  The Certifier has accepted the Sediment and Erosion Control Plan provisions for construction.	Compliant	



C25	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	
C26	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 Ingal	Not triggered at the time of the first audit inspection. Will be included for CC3 as per Staging.	Not triggered	
C27	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	
C28	In the event that surface disturbance identifies a new Aboriginal object:  (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (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; (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 (e) works may only recommence with the written approval of the Planning Secretary.	CEMP  Site induction.  Interview: R Ingal	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.  No unexpected finds reported up to the time of the audit site inspection	Not triggered	
C29	If any unexpected archaeological relics are uncovered during the work, then:  (a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; (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 (c) works may only recommence with the written approval of the Planning Secretary.	As above	Section 13 - Appendix 5 of the CEMP addressed Unexpected Heritage Finds.  No unexpected finds reported up to the time of the audit site inspection	Not triggered	
C30	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.	CWMP  Site inspection	Waste storage and separation was observed on site undertaken in accordance with the CWMP.	Compliant	
C31	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	As above	Waste classification is addressed in the CWMP. Waste segregation was observed on-site as per the management measure identified in the CWMP. Waste records for demolition waste, including asbestos were sighted by the auditor during the site inspection	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.  No evidence of concrete waste or washout was observed by the auditor to be occurring on site.	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.	May to July 2023 JHG Nowra (002) - Waste Tracking Spreadsheet	The Waste Tracking Register is adequately recording waste generation/disposal.	Compliant	
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	An unexpected find of bonded asbestos was identified and management 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.	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	The first Independent Audit inspection was undertaken within 12 weeks of the commencement of construction.	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 2023 - DPE, dated 27/07/2023	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 (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.		Not yet triggered for this first Independent Audit.	Not triggered	
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.		Not yet triggered for this first Independent Audit.	Not triggered	
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		Not triggered	
<b>PART D - Prior to Commencement of Operation</b>					
D1 to D29	Operational Phase, not triggered for this Audit			Not triggered	
<b>PART E - Post Occupation</b>					
E1 to E18	Occupation, not triggered for this Audit			Not triggered	

# Appendix B Audit Plan

Prepared for John Holland Group

# Shoalhaven Hospital Redevelopment (SSD-35999468)

**Independent Audit**

July 2023

Project Number: 230085

## Document verification

Project Title: Independent Audit

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Project Number: 230085

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Project File Name: 230085 Audit Plan

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Revision	Date	Prepared by	Reviewed by	Approved by
Draft	21/07/2023	Olivia Merrick	Will Weir	Will Weir
Final	31/07/2023	Olivia Merrick	Will Weir	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>	John Holland Group (JHG)
<b>Project</b>	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>	12 weeks from construction commencement: 3 August 2023
<b>Audit Criteria</b>	State Significant Development: SSD-35999468
<b>Proposed Audit Details</b>	Opening meeting: 08:30 on date of site audit (TBC) Closing meeting: on/ around 16:00 on date of audit (TBC)
<b>Project representatives required</b>	<ul style="list-style-type: none"> <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 environmental compliance of the development)</li> </ul> To be advised one week prior to site audit
<b>Audit Team</b>	Will Weir, NGH - auditor
<b>Audit report</b>	A final audit report is provided to JHG at the completion of the audit process
<b>Previous Audit date</b>	n/a

## 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)

## GOLD COAST

2B 34 Tallebudgera Creek Road  
Burleigh Heads QLD 4220  
(PO Box 424 West Burleigh QLD 4219)

T. (07) 3129 7633

## SYDNEY REGION

Unit 17, 21 Mary Street  
Surry Hills NSW 2010

T. (02) 8202 8333

## BEGA

Suite 11, 89-91 Auckland Street  
(PO Box 470)  
Bega NSW 2550

T. (02) 6492 8333

## MELBOURNE

Level 14, 10-16 Queen Street  
Melbourne VIC 3000

T: (03) 7031 9123

## TOWNSVILLE

Level 4, 67-75 Denham Street  
Townsville QLD 4810

T. (07) 4410 9000

## BRISBANE

T3, Level 7, 348 Edward Street  
Brisbane QLD 4000

T. (07) 3129 7633

## NEWCASTLE - HUNTER & NORTH COAST

Level 1, 31-33 Beaumont Street  
Hamilton NSW 2303

T. (02) 4929 2301

## WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)  
Wagga Wagga NSW 2650

T. (02) 6971 9696

## CANBERRA

Unit 8, 27 Yallourn Street  
(PO Box 62)  
Fyshwick ACT 2609

T. (02) 6280 5053

## SUNSHINE COAST

Level 2 Aerodrome Road  
Maroochydore QLD 4558

(07) 4410 9000

## WODONGA

Unit 2, 83 Hume Street  
(PO Box 506)

Wodonga VIC 3690

T. (02) 6067 2533

# **Appendix C Independence declaration and audit team CVs**



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## 6. Appendices

### Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor

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Project Name: Shoalhaven Hospital Redevelopment

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Consent Number SSD 35999468

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Description of Project: Construction of 7 story building (demolition, earthworks, subdivision and landscaping)

---

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

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

---

Date 14/7/2023

---

I declare that:

- i. 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;
- ii. 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;
- iii. 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;
- iv. I am not an Environmental Representative for the project; and
- v. 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:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) 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
  - b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)
-

---

**Name of Proposed Auditor:** Will Weir

**Signature** 

**Qualification** BE (Environmental) Hons

**Company:** NGH PTY LTD

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## 6. Appendices

### Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor

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-

---

**Name of Proposed Auditor:** Natascha Arens

**Signature** 

**Qualification** 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

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  - b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)
-

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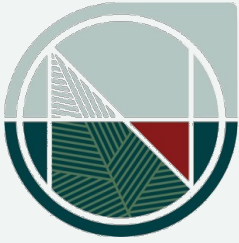
**Name of Proposed Auditor:** Olivia Merrick

**Signature**



**Qualifications** RABQSA (Exemplar Global) Leading Management Systems Audits  
[BSc Cons Biol, BEnvSc (Hons)]

**Company:** NGH P O



# NGH

## Will Weir

B. Eng (Environmental) Honours

Assoc. dip. Eng (Mechanical)

ICAM Lead Investigator

## KEY PROJECTS

### Some Relevant Examples

- Independent Environmental Audit of Prince of Wales – Randwick Campus Redevelopment, NSW
- Independent Environmental Audit of Griffith Base Hospital Redevelopment
- ICAM Lead Environmental Investigator at ARTC Inland Rail
- Independent Environmental Audit of Newcrest's Cadia Gold Mine, NSW
- Independent Environmental Compliance Audits for South32 – Illawarra and Dendrobium mines, NSW
- Independent Environmental Compliance Audit for Rio Tinto – Hunter Valley Operations, NSW
- Independent Environmental Compliance Audits for Whitehaven – Narrabri underground, Maules Creek, Tarrowonga, Canyon and Rocglen surface mines, NSW
- Environmental Authority Compliance Audit – Certifying lead auditor for Australia Pacific LNG Upstream CSG Tenements, QLD
- Environmental Authority Compliance Audit – Certifying lead auditor for construction Australia Pacific LNG Export Pipeline against Environmental Authority and Material Change of Use conditions of approval, QLD
- Third Party Environmental Compliance Audit – Certifying lead auditor for construction of the Santos GLNG Export Pipeline against Environmental Authority and Material Change of Use conditions of approval, QLD
- Facilitation of Independent Environmental Audits for the Inland Rail Parkes to Narromine (P2N) and Narrabri to Northstar (N2NS) freight rail construction

## Technical Director – Environmental Management

Will is an Environmental Engineer with over 25 years consulting, industry and public sector experience. He has delivered projects for surface and underground mining; upstream oil & gas; industrial major infrastructure construction and operations (rail, highway, pipeline, power transmission); processing, refining and manufacturing; mechanical maintenance; power generation and transmission; aerospace industries; waste management and landfill; and agricultural sectors. He has supported clients across all jurisdictions in Australia, along with New Zealand, Papua New Guinea (PNG), Southeast and Central Asia, North America and Africa.

His breadth of experience includes multi-discipline EHS and civil project management, statutory environmental impact assessment (EIA, EIS and ESHIA to IFC and World Bank Standards), environmental management planning and implementation, EHS compliance and assurance auditing, EHS management systems, and EHS performance improvement and transformation programs. He has also led and delivered liquid and solid waste management assessments, preliminary and detailed environmental site assessment programs, hazardous material assessments, and site decommissioning and remediation projects.

Will has led audit teams for statutory independent environmental audits in NSW and Queensland, along with internal assurance audit programs and EHS due diligence reviews both nationally and internationally. This includes delivery of multi-site EHS assurance programs, with a risk focused approach, assisting clients with his extensive EHS experience to achieve pragmatic and achievable outcomes. He is experienced in the preparation of post-approval Construction and Operational Environmental Management Plans and has acted in the role of independent environmental representative overseeing and reviewing the delivery of infrastructure projects against environmental management requirements. Will is also an ICAM Lead Investigator.

Will has managed and mentored multi-discipline and technically focused teams of EHS professionals. In his role of Technical Director at NGH he is responsible the strategic direction of the Environmental Management service line with a focus on supporting clients with post-approval management of environmental risk and realising opportunities for improvement.

# Tertiary Qualification

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## **University of New England**

Bachelor of Engineering (Environmental), Honours

## **Institute of Technology, Sydney**

Associate Diploma in Mechanical Engineering

# Professional Experience

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## **Key Compliance Auditing Roles**

- Independent Environmental Audit of Prince of Wales – Randwick Campus Redevelopment, NSW
- Independent Environmental Audit of Griffith Base Hospital Redevelopment, NSW
- Environmental Authority Compliance Audit – Trap Gully Landfill for Banana Shire Council, QLD
- EPBC Audit of Holcim's Donnybrook Sand Quarry, QLD
- Independent Environmental Audit of Newcrest's Cadia Gold Mine, NSW
- Independent Environmental Compliance Audits for South32 – Illawarra Coal and Dendrobium mines, NSW
- Independent Environmental Compliance Audit for Rio Tinto, Coal & Allied – Hunter valley Operations, NSW
- Independent Environmental Compliance Audits for Whitehaven Coal - Narrabri Coal underground mine, Maules Creek, Tarrawonga, Canyon and Rocglen surface mines, NSW
- Environmental Authority Compliance Audit – Certifying lead auditor for Australia Pacific LNG Upstream CSG Tenaments, QLD
- Environmental Authority Compliance Audit – Certifying lead auditor for construction Australia Pacific LNG Export Pipeline against Environmental Authority and Material Change of Use conditions of approval, QLD
- Third Party Environmental Compliance Audit – Certifying lead auditor for construction of the Santos GLNG Export Pipeline against Environmental Authority and Material Change of Use conditions of approval, QLD
- Facilitation of Independent Environmental Audits for the Inland Rail Parkes to Narromine (P2N) and Narrabri to Northstar (N2NS) freight rail construction projects.
- Environmental Authority Compliance Audit for NRG Gladstone Power Station, QLD

## **Environmental Representative**

- Environmental Compliance Representative (ER) for the Essential Energy Deniliquin to Moama 132kV Transmission Line construction project, NSW
- Support Environmental Management Representative (EMR) for Pacific Highway - Karuah to Bulahdelah, NSW
- Support Environmental Management Representative (EMR) for Pacific Highway - Kempsey Bypass and Bridges,

## **Key Assurance Auditing Roles**

- Lead ICAM Environmental Investigator for the ARTC Inland Rail project, Program Wide
- Rehabilitation Assessment (Erosion and Sediment Control) of the Coopers Gap Wind farm, QLD
- Environmental Compliance Assurance Audit for BHP, Goonyella Mine, QLD
- ISO14001:2015 Environmental Management System update and in-country Performance Review at Central Processing Facility (CPF) and Agogo Processing Facility (APF) – for Oil Search Ltd, PNG
- EHS Risk Review for Philex Mining operating gold mine, Philippines
- Safety Critical Risk Assurance Audit for Orica – Yarwun Explosives Processing facility, Gladstone, QLD
- Post-acquisition Environmental Assurance Audit of Gloucester Coal Ltd mine sites - for Yancoal, NSW
- Environmental Compliance Audit Programme – for all Yancoal assets, NSW, QLD and WA
- Revegetation Assessment of the operational Coopers Gap Wind Farm for Catcon Civil & Allied Technical Construction, QLD
- Corporate HSE Assurance Audit Program – for Raytheon (RAAF Systems), NSW/QLD
- Corporate HSE Assurance Audit Program – for Cummins, SA
- Corporate HSE Assurance Audit Program – for Boeing Defence Australia (BDA), NSW/QLD
- EHS Audit for UTC Aerospace



- Environmental Assurance Audits for Nyrstar – Lead and Zinc smelters in Port Pirie, SA and Hobart, Tas
- Corporate Environmental Assurance of manufacturing and maintenance workshop facilities for JLG industries, NSW
- Pre-regulatory audit EPBC Review for British Gas – QGC LNG upstream CSG tenements, QLD
- Environmental Assurance CEMP/SEMP Audit/Review of Australia Pacific LNG Western High Pressure Gas Network (WHPGN) ex. Combabula Spur Pipeline Construction
- Construction Readiness and Capability Environmental Audit – for Santos GLNG Export Pipeline
- Health & Safety Maturity Assessment for Pernod Ricard winery, New Zealand
- Environmental Assurance Audits of waste management facilities and waste transfer stations for Kempsey Shire Council, NSW

### ***Key Due Diligence Roles***

- Lead auditor for the EHS Due Diligence for Genex Power of the proposed pumped hydro storage project at the former Kidston Gold mine, as part of the Kidston Clean Energy Hub in North Queensland
- Lead for the EHS Due Diligence for Confidential Client for acquisition of an Underground Copper Mine
- EHS Due Diligence for several Anglo-American Coal Assets, QLD
- Lead auditor for the EHS Due Diligence for Beech Energy for the successful acquisition of Origin Energy's conventional off-shore and associated on-shore gas assets in New Zealand, Victoria, South Australia and Western Australia. The project considered potential EHS material risks and consideration of performance with NOPSEMA EHS requirements for off-shore operation along with State and Federal requirements for on-shore activities.
- Lead auditor for the EHS Due Diligence for confidential client for acquisition of a Pyrethrin Production Facility, Tas
- Lead auditor for the EHS Due Diligence for Sugar Processing facilities and rail operations, for Confidential Client, QLD
- Environmental Due Diligence for confidential client –pre-acquisition environmental due diligence audit of an abattoir facility in southeast Queensland.
- Environmental Due Diligence pre-divestment of WSN Environmental Solutions' waste management facilities across the Sydney basin, NSW
- WSN - Transaction Vendor Environmental Due Diligence – audits of three large waste management facilities in the greater Sydney area, NSW



# NGH

## KEY PROJECTS

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### **Key Road Infrastructure**

- Albion Park Rail Bypass
- Heathcote Road
- Empire Bay Road Upgrade
- M7 Motorway & M2 Motorway
- Bringelly Road Upgrade
- Camden Valley Way Upgrade
- Schofields Road Upgrade
- Bega Bypass
- Conjola Mountain – Princes Highway
- Karuah to Bulahdelah Bypass
- Bonville Bypass
- Nabiac Bypass
- Nepean River Green Bridge
- Karuah Bypass
- Liverpool to Parramatta Transitway
- Princes Highway Nowra
- Bangor Bypass
- Northern Hum Alliance
- Woomargama Bypass
- Albury Bypass

### **Marina's and Wharves**

- Elizabeth Bay Marina
- Manly Ferry Wharf
- HMAS Platypus
- National Maritime Museum Wharf
- Balls Head Coal Loader Wharf – historic site
- Church Point Cargo and Ferry wharves
- Stockton Boat Harbour and Swing Mooring

### **Department of Planning approved independent auditor for:**

- St Marys Intermodal
- Sutherland, Griffith Base, New Maitland & Bowral Hospitals
- Campbelltown Hospital redevelopment
- Albury Bypass Post approval
- Bangor Bypass Post approval

## Natascha Arens

BAppSc, MB&EnvMgt

CEnvP, MEIANZ

## GM – Operations

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Natascha launched the Sydney Branch of NGH in 2006. She has around 30 years of professional experience in environmental management and impact assessment and began her career as an ecologist in South Eastern NSW.

She has worked in both the public and private sector in a number of senior management and policy roles. Natascha has a wealth of experience in environmental impact assessment for large infrastructure projects. She is an Exemplar Global Principal Environmental Auditor and has extensive auditing experience across a range of industries, with a focus on infrastructure. She has worked across a diverse range of environments from dry arid areas to alpine environments and subtropical areas.

The diversity of her planning experience coupled with her onsite and project management experience has equipped her with an excellent understanding of environmental issues, legislation and planning in regional and urban environments. Natascha gives clients assurance that NGH will use innovation and breadth of company history to drive sustainable outcomes for projects.

Natascha has a leading role in the operational performance of the company. Instigating improved environmental performance is something Natascha pursues with enthusiasm.

## Tertiary Qualification

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### **Southern Cross University, Lismore**

Bachelor of Applied Science (Conservation Technology and Management) (1991)

### **University of Newcastle**

Master of Business and Environmental Management (2006)

## Professional Experience

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### **GM Operations – NGH Pty Ltd**

- Maintenance and compliance with the company Quality & OHS&R System
- Review and monitor major projects, including large Pacific Highway Upgrades, Princes Highway Upgrades, Water and energy infrastructure, M2 and M7 upgrades and maintenance, recreation spaces and masterplans, renewable energy projects and Biodiversity Strategies

### **Manager Environmental Technology Branch – RTA**

- Management of the three sections within the branch (up to 18 full time staff)

- Facilitate improvement of environmental management within the RTA
- Reviewing and overseeing major projects, including major freeway and Highway upgrades. Eg: M7 Motorway, Bulahdelah Bypass

### ***Biodiversity and Sustainability Policy Officer – RTA***

- Respond to ministerial enquiries.
- Comment on state and federal legislation changes
- Prepare policy on biodiversity and sustainability
- Prepare and implement RTAs Sustainability Action Plan
- Manage funding for Roadside Environment Committee
- Manage biodiversity related research projects

### ***Environmental Officer, Environmental Projects Section – RTA***

- Environmental Management Systems (EMS) auditing
- Preparation of Environmental Management Plans (EMP)
- Review of RTA environmental G specifications and procedures. Update the RMS EMS

### ***Manager Environmental Projects Section (secondment) – RTA***

- Maintain registers of projects, financial performance and provide reporting to the branch manager
- Marketing and promotions of services
- Expert Advisor for environmental assessments, management and planning including Pacific Highway Upgrades, and M7 Motorway

### ***Environmental Officer, Environmental Assessments – RTA***

- Management and Preparation of Environmental Impact Assessments including Review of Environmental Factors and EIS, including Robinvale Murray River Bridge replacement REF
- Preparation of Representation Reports, proposals and briefing documents, major projects included Liverpool to Parramatta Transitway and Karuah – Bulahdelah EIS and representations report

### ***Environmental Consultant – NGH Pty Ltd***

- Species impact statements, design and implementation of fauna and flora survey; Preparation of environmental assessment documents in areas where development may impact on the natural environment

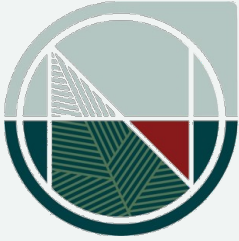
### ***Eden District Technical Officer, Threatened Species Unit – NSW NPWS***

- Update Eden District Incident Action Plan; Implement and maintain fauna databases, TSU GIS management; Process data from field surveys, targeting endangered and locally significant fauna; Liaison and negotiation with NSW State Forest regarding data collection and exchange; Provide technical and professional advice to 33 landholders in preparing a Plan of Management for a Voluntary Conservation Agreement (VCA). Flora and fauna surveys

## **Additional Qualifications and Skills**

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- Exemplar Global Certified Environmental Management Systems Auditor (ISO 14001)
- Soil and water and erosion and sediment control training
- Certified Environmental Practitioner
- EIANZ Member
- Certificate II in Bush Regeneration
- Senior First Aid Certificate
- Certificate IV in Assessment and Workplace Training



# NGH

## KEY PROJECTS

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### Environmental Management

- Stewardship Maintenance Contract, Sydney West Zone (NSW). Environmental approvals for development, post-approval documentation (CEMP and subplans)
- Woolgoolga to Ballina (W2B) Pacific Highway upgrade New South Wales (WSP/ Transport for NSW). Environmental management for compliant site-based construction activities, post-approval documentation (CEMP and subplans)
- Wheatstone Liquefied Natural Gas construction (W.A). Environmental project management, contractor CEMP and subplan approval, contractor Audits and inspections.
- Harcourt Modernisation water pipeline project (Vic). CEMP drafting and implementation, audits and inspections.
- Gladstone LNG Upstream - Roma Coal Seam Gas Compressor station construction (QInd). Lead environmental project management and compliance assurance for all construction activities, post-approval documentation (CEMP and subplans)
- Macedon Gas Plant - Onshore Domestic Gas Plant development (W.A.). Lead compliance assurance for all construction activities, post-approval documentation (CEMP and subplans)

### Certifications

- Rail Industry Safety Induction (RSN00162392 100 –N.S.W.)
- National OHS General Induction Training – White Card
- Advanced (Level 3) First Aid certification (HLTFA402B)

## Olivia Merrick

B. Env Sci (Honours)

Law Masters (Construction)

## Principal Consultant – Environmental Management

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Olivia is environmental management professional, experienced in leading teams to deliver environmental compliance excellence. She has over 20 years consulting, industry and public sector experience. She has delivered complex multidisciplinary projects for major infrastructure construction (rail, highway, pipeline, power transmission); and large-scale resources development (exploration; underground mining; upstream and downstream oil & gas) from a technical base that spans ecology, rehabilitation, acid sulfate soils, contaminated sites, erosion and sediment control and noise management. Olivia has supported clients across Australia.

Her breadth of experience covers heavily scrutinised construction projects. She has been responsible for environmental project management, leading project-scale Management of Change processes (project modifications/ amendments and cascading those to compliance initiatives), developing and implementing compliance tracking programs and establishing environmental management systems. Olivia has also worked extensively on site, developing practical solutions to achieve a best for project result.

Olivia has led audit teams for independent environmental audits in NSW and Western Australia, along with internal environmental due diligence reviews in Victoria and Queensland. She has vast experience in preparing pre-approval environmental assessment documentation; and post-approval Construction and Environmental Management Plans and sub-plans. She has held independent environmental representative roles, overseeing and reviewing the delivery of infrastructure projects against environmental management requirements. Olivia has managed and mentored large and diverse teams of environmental professionals. In her role as Principal Consultant (Compliance) at NGH, Olivia uses her expertise to assist the Environmental Management team to deliver environmental compliance excellence for our clients.

## Tertiary Qualification

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### *Murdoch University*

Bachelor of Science (Environmental Science), Honours

### *Melbourne Law School*

Law Masters (Construction), graduation expected 2024

## Professional Experience

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### ***Environmental Impact Assessment and Planning***

- Review of Environmental Factors (REF) for Transport for NSW – Environmental Manager for Galston Gorge slope remediation and culvert upgrade works. Extensive traffic management planning and community consultation (road closure and associated detour assessment); significant European heritage considerations (circa 1821 sandstone culverts); and biodiversity values (threatened flora species and fauna habitat)
- Review of Environmental Factors (REF) for Transport for NSW – Environmental Manager for Canoelands road upgrade. Extensive government and community consultation (crown lands).
- State Significant Infrastructure (SSI) – Transport for NSW, Pacific Highway Upgrade - Consistency Assessments for Portion D – Environmental Lead
- State Significant Infrastructure (SSI) – Transport for NSW, Ballina Bypass – Environmental Impact Assessment – Environmental Lead
- Petroleum Pipeline Lease (PPL) – Chevron, Wheatstone field – Environmental Impact Assessment – Environmental Lead
- Project Modifications (4) - Gladstone LNG (Qld) – Roma Field – Environmental Lead
- Environmental Impact Assessment (EIS) – Horizontal Directional Drilling and Onshore Pad - Macedon Gas Project – Environmental Lead
- Transmission Line Route Selection Studies and Options Analysis (W.A) – Environmental Manager
- Environmental Impact Assessment (EIS) - Highland Source Project (NSW) – Water pipeline route selection
- Review of Environmental Factors (REF) - Australian Nuclear Science Technology Organisation (NSW), Expansion Project – Environmental Manager

### ***Environmental Representative***

- Environmental Representative (ER) for the Coliban Water Harcourt Modernisation Project, Supply and installation of 45km of HDPE pipeline, transfer pump station construction, Vic.
- Support Environmental Management Representative (EMR) for Pacific Highway – Woolgoolga to Ballina, NSW
- Support Environmental Management Representative (EMR) for Pacific Highway – Ballina Bypass, NSW

### ***Key Auditing Roles***

- Environmental Audit of Portion C construction, Woolgoolga to Ballina Pacific Hwy Upgrade, NSW
- Environmental Audit of the Ballina Bypass construction, NSW
- Environmental Compliance Audit, Macedon Gas Plant construction, W.A.
- Environmental Compliance Audit, Wheatstone Gas Plant construction, W.A

### ***Key Due Diligence reviews***

- Environmental Due Diligence, Fairview Coal Seam Gas Hub, Qld
- Environmental Due Diligence, Roma Coal Seam Gas Hub, Qld
- Environmental Due Diligence, Coliban Water Pipeline, Vic.

## **Appendix D Audit team approval**

Mr Nicholas Dowman  
Senior Planning Advisor  
Health Infrastructure NSW  
1 Reserve Road  
ST LEONARDS NSW 2065

27/07/2023

Dear Mr Dowman

**Shoalhaven Hospital Redevelopment (SSD 35999468)  
Independent Auditor 2023**

I refer to your letter dated 25 July 2023, seeking the agreement of the Planning Secretary of the Department of Planning and Environment (“the department”) of the suitability of the Auditor’s qualifications, experience and independence to undertake an independent audit of the Shoalhaven Hospital Redevelopment (“the development”), in accordance with Schedule 2, Condition C37 of the State significant development consent SSD 35999468, as modified (“the consent”).

Having considered the qualifications and experience of Ms Natascha Arens, Ms Olivia Merrick and Mr Will Weir of NGH, the Planning Secretary endorses the appointment of Ms Arens, Ms Merrick and Mr Weir to undertake the audit in accordance with Condition C37 of the consent. This approval is conditional on Ms Arens, Ms Merrick and Mr Weir being independent of the development and maintaining Exemplar Global certification. The department 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 the department’s 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 within two months of undertaking the independent audit site inspection.

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

Department of Planning and Environment



Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on 4247 1852 or by email to [Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary



## **Appendix E Agency consultation**

**From:** [Andrew Lissenden](#)  
**To:** [Olivia Merrick](#)  
**Subject:** TfNSW Comments - Shoalhaven Hospital Redevelopment Independent Environmental Audit (SSD-35999468) - TfNSW Ref: STH21/00089/07  
**Date:** Wednesday, 2 August 2023 12:01:07 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Update from TfNSW - Shoalhaven Hospital Redevelopment - Construction Traffic and Pedestrian Management Sub-Plan Consultation \(TfNSW Ref STH210008906\).msg](#)

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Hi Olivia,

Thanks for your email below and the subsequent phone discussion. Transport for NSW (TfNSW) appreciates being involved in the consultation for the initial Independent Environmental Audit that you will be undertaking.

TfNSW notes:

- The Independent Environmental Audit is being undertaken in accordance with Conditions C36 to C41 of SSD 35999468 (the consent).
- The consent does not specifically require consultation with TfNSW as part of the Independent Environmental Audit, however, there are other 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).
- Given the early stage of the development, the requirements of Conditions D18 and D19 are not yet triggered.

Having regard to the comments above, TfNSW advises:

- There are no specific environmental issues 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. A copy of the TfNSW emails dated 2 May 2023 and 15 May 2023 are attached for your information and records.
- Discussions 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 Demand Management Team (as required by Condition D18).
- Separate consultation should be had with Shoalhaven City Council.
- Should any further advice be requested from TfNSW can the applicable conditions within the consent that you are specifically seeking comment on from TfNSW please be detailed in the request?
  - Any further correspondence to TfNSW can be emailed to [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au). Please include the TfNSW Ref: STH21/00089 in the subject line.

Regards

**Andrew Lissenden**  
Development Case Officer  
Development Services, South

Regional and Outer Metropolitan  
**Transport for NSW**

P 0418 962 703 E [andrew.lissenden@transport.nsw.gov.au](mailto:andrew.lissenden@transport.nsw.gov.au)  
[transport.nsw.gov.au](http://transport.nsw.gov.au)  
Level 4, 90 Crown Street  
Wollongong NSW 2500



Transport  
for NSW

I work flexibly. Unless it suits you, I don't expect you to read or respond to my emails outside of your normal work hours.

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OFFICIAL

**From:** Olivia Merrick <[olivia.m@nghconsulting.com.au](mailto:olivia.m@nghconsulting.com.au)>  
**Sent:** Tuesday, 1 August 2023 2:10 PM  
**To:** Development North <[Development.North@transport.nsw.gov.au](mailto:Development.North@transport.nsw.gov.au)>  
**Subject:** Shoalhaven Hospital Redevelopment (SSD-35999468)

You don't often get email from [olivia.m@nghconsulting.com.au](mailto:olivia.m@nghconsulting.com.au). [Learn why this is important](#)

**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 afternoon,

NGH have been engaged by the proponent for the abovementioned State Significant Development, to undertake the first (12 week) independent environmental audit, as required by SSD 35999468 (the consent). This initial Independent Environmental Audit is scheduled for 7<sup>th</sup> August 2023 on-site.

We have been unable to locate the correct email address for Shoalhaven (Wollongong/south office), apologies for forwarding this correspondence to this inbox.

NGH are therefore seeking to consult with TfNSW generally with regard to compliance matters relevant to the development.

Should there be any specific environmental issues within the scope of auditing against SSD 19989744 that TfNSW would like NGH to focus on, please return email or phone Olivia Merrick at your earliest convenience.

Look forward to hearing back soon,

**Olivia Merrick**  
Principal Environmental Compliance

m: 0401 552 264

e. [olivia.m@nghconsulting.com.au](mailto:olivia.m@nghconsulting.com.au)

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



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

**From:** [Olivia Merrick](#)  
**To:** [wollongong@planning.nsw.gov.au](mailto:wollongong@planning.nsw.gov.au)  
**Subject:** Shoalhaven Hospital Redevelopment (SSD - 35999468)  
**Date:** Friday, 21 July 2023 3:01:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Good afternoon,

NGH have been commissioned by John Holland Group to undertake the initial (12 week) Independent Audit; we plan to attend site 3<sup>rd</sup> August 2023.

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

NGH will also contact Nowra Council and Transport for NSW as the approving agencies, for the required management plan documentation for this State Significant Development Project.

Look forward to hearing back from you soon,

**Olivia Merrick**  
Principal Environmental Compliance

m: 0401 552 264

e. [olivia.m@nghconsulting.com.au](mailto:olivia.m@nghconsulting.com.au)

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



**From:** [Council Email](#)  
**To:** [Olivia Merrick](#)  
**Subject:** Shoalhaven City Council - Your email has been received.  
**Date:** Tuesday, 1 August 2023 2:08:47 PM  
**Attachments:** [scclogo173x89final\\_d470497d-1ca6-4647-b1c1-a01fc2ccc22d.png](#)  
[stroke\\_71a3d4ba-5c4f-449c-821b-66f96c924886.png](#)  
[corevalues@2x\\_f35ce908-1d2d-415e-9ccc-24456de260d5.png](#)

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Thank you for contacting Shoalhaven City Council.

Your email has been received and will be referred to the appropriate Council Officer for action.

If your matter is urgent, please call Council on 02 4429 3111 during business hours (Monday to Friday - 8.30am to 5.00pm) or on 02 4421 3100 outside of business hours. Please note that most information regarding Council activities and services, can be found online at <https://www.shoalhaven.nsw.gov.au/Home>

If your email relates to submitting a new Development Application, all DAs must now be lodged via the NSW Planning Portal <https://www.planningportal.nsw.gov.au/> - This is a New South Wales State Government initiative and mandate.

In future, if you need to report an issue or request a service please use the online link <https://www.shoalhaven.nsw.gov.au/Services/Report-request-or-provide-feedback>, your request will be automatically distributed to the responsible Council team for action and you will receive a customer service request number to enable you to track your request online

This email has been generated automatically and does not require a response



1300 293 111  
Bridge Road (PO Box 42) Nowra NSW 2541  
[shoalhaven.nsw.gov.au](https://www.shoalhaven.nsw.gov.au)

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RESPECT | INTEGRITY | ADAPTABILITY | COLLABORATION

## **Appendix F Site photographs**









**Project Name: Shoalhaven Hospital Redevelopment**

**Principal Contractor - John Holland**

**JOHN HOLLAND**



**SAFETY FOOTWEAR  
MUST BE WORN  
ON THIS SITE**



**EYE PROTECTION  
MUST BE WORN**



**HIGH VISIBILITY  
CLOTHING  
MUST BE WORN  
ON THIS SITE**



**THIS IS A HARD  
HAT AREA  
SAFETY HELMETS  
MUST BE WORN**



**LONG SLEEVED  
SHIRT AND  
LONG PANTS  
MUST BE WORN**



**HAND  
PROTECTION  
MUST BE CARRIED**



**DANGER  
NO ENTRY  
AUTHORISED  
PERSONNEL ONLY**

**ALL VISITORS MUST REPORT TO THE SECURITY OFFICE**

**SITE CONTACTS**

<b>Builder: John Holland Pty Ltd</b>	<b>Structural Engineer: Meinhardt-Bonacci Pty Ltd</b>
<b>Managing Company: Johnstaff Pty Ltd</b>	<b>Site/Project Manager: Chris Sykes</b>
<b>Address: Corner of North and Shoalhaven Street</b>	<b>24-Hour Contact Phone Number: 0466 577 767</b>
<b>Certifier: Blackett Maguire + Goldsmith Pty Ltd</b>	





## 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)

## GOLD COAST

2B 34 Tallebudgera Creek Road  
Burleigh Heads QLD 4220  
(PO Box 424 West Burleigh QLD 4219)

T. (07) 3129 7633

## SYDNEY REGION

Unit 17, 21 Mary Street  
Surry Hills NSW 2010

T. (02) 8202 8333

## BEGA

Suite 11, 89-91 Auckland Street  
(PO Box 470)  
Bega NSW 2550

T. (02) 6492 8333

## MELBOURNE

Level 14, 10-16 Queen Street  
Melbourne VIC 3000

T: (03) 7031 9123

## TOWNSVILLE

Level 4, 67-75 Denham Street  
Townsville QLD 4810

T. (07) 4410 9000

## BRISBANE

T3, Level 7, 348 Edward Street  
Brisbane QLD 4000

T. (07) 3129 7633

## NEWCASTLE - HUNTER & NORTH COAST

Level 1, 31-33 Beaumont Street  
Hamilton NSW 2303

T. (02) 4929 2301

## WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)  
Wagga Wagga NSW 2650

T. (02) 6971 9696

## CANBERRA

Unit 8, 27 Yallourn Street  
(PO Box 62)  
Fyshwick ACT 2609

T. (02) 6280 5053

## SUNSHINE COAST

Suite 101, Level 2/30 Main Drive  
Birtinya QLD 4575

(07) 4410 9000

## WODONGA

Unit 2, 83 Hume Street  
(PO Box 506)

Wodonga VIC 3690

T. (02) 6067 2533