

HEALTH INFRASTRUCTURE

Independent Audit Initial Audit – Proponent review and response

SSD-35999468 Shoalhaven Hospital

27th September 2023

Declaration

This Proponent review and response has been prepared for NSW Health Infrastructure (HI) in response to an Independent Audit, including the recommendations and opportunities for improvement identified in the final Audit Report. The response to each of the audit findings is included as outlined in the *Independent Audit Post Approval Requirements (May 2020)*.

Declaration	
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Date:	27 th September 2023

Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
V1.1	15/09/2023	W.Wier	Independent Audit (Initial Audit) – Proponent review and response	N.Arens	N.Arens

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1. Introduction

1.1 Project Application Number and Project Name

SSD-35999468 Shoalhaven Hospital

1.2 Site Address

Shoalhaven Hospital Redevelopment, Scenic Drive, Nowra, NSW, 2541

Lot 373	DP: 755952
Lot 1	DP: 1043088
Lot 1031	DP: 1208730
Lot 1302	DP: 1208730
Lot 102	DP: 1165533
Lot 104	DP: 1165533
Lot 7034	DP: 1031852

1.3 Project Contact Details

Proponent	NSW Health Infrastructure
Client Representative	John Staff
Contractor	John Holland Pty Ltd

1.4 Independent Auditor

NGH Pty Ltd

1.5 Independent Audit Date

3rd August 2023

2. Proponent response

The Independent Audit Report No.V1.1 was prepared by W.Weir & reviewed by N.Arens, from NGH. The Audit Report dated 15th September 2023 was received on 15th September 2023 for an audit site inspection completed on 3rd August 2023. The audit report has been reviewed and the response to the audit findings are listed in the below table.

In relation to non-compliances, the response sets out the action and the completion timing. In relation to observations and opportunities identified for improvement, the actions are also set out or the reason for not implementing any measures in response.

Please note the below table contains a list of the 5 non-compliances as determined in Audit (230085 Audit Report_Final V1.1).

Consent Condition No.	Requirement (exact wording from consent)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
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	Non-compliant	NC1	Complete actions complete below – items have now been complete
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 the development consent	Non-compliant	NC2	Complete actions complete below – items have now been complete
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 program required under the conditions of this consent (iv) Regularly reporting on the environmental performance of the development in accordance with the reporting arrangement in any plans or programs approved under the conditions of this consent (v) A comprehensive summary of the monitoring results of the development, reported in accordance with the specification in any conditions, reported in accordance with the specifications in any conditions of consent, or any approved plans and programs (vi) Contact details to enquire about the development or to make a complaint (vii) A complaints register, updated monthly		The requirements listed in A23 (a) (i), (ii),(iii), (iv), (v), (vi), (vii) were not found on the applicants website at the time of the audit site inspection	Non-compliant	NC3	The Applicant is to update the website in accordance with the requirement of this conditions

Consent Condition No.	Requirement (exact wording from consent)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
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>		NC4	No further Action
B17	<p>Prior to the commencement of construction, the Applicant must submit a Construction Environment Management Plan (CEMP) to the certifier and must be published on the Applicant website in accordance with condition A23. The CEMP must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> (iii) temporary site office arrangement (viii) Groundwater management plan including measures to prevent ground water contamination 		<p>(iii) Section 7.7 of the CEMP references Environmental Control Plans to contain primary environmental constraints including locations of offices. The listed Environmental control 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 (referenced as "site sheds"), and in Figure 2 of the CNVMP (not names), 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 details as to the makeup of the office arrangements. Notwithstanding, the staging report is not a management plan under the CEMP. It is not clear that the staging report and management plan figures are aligned.</p> <p>(vii) The CEMP reviewed at the time of the audit, did not include a groundwater management plan.</p>		NC5	Office arrangements and groundwater management plan to be complete – Items listed complete and issued.