

Proponent Response to Independent Audit Findings Randwick Campus Redevelopment Project

Integrated Acute Services Building State Significant Development (SSD) 10339

PWC

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Introduction

Project Name and Project Application Number

Randwick Campus Redevelopment Project Integrated Acute Services Building (IASB) - SSD10339

Site Address

Lot 1 DP870720 (220 Avoca Street, Randwick), Lot 101 DP1282403 (High Street, Randwick)

Title and Revision Number

Proponent Response to Independent Audit Findings (Version 1)

Date

February 2023

Contact Details

Proponent Health Infrastructure

Client Representative PwC

Managing Contractor Lendlease Building

Independent Audit Date

12th of September 2022

Independent Auditor

NGH Pty Ltd

Proponent Response

Table 1 below details the Conditions of Consent that were classified as "Non-compliant" during the Independent Audit conducted on 12 September 2022. As required the proponent has provided a detailed action plan to be undertaken in response to each non-compliance, refer table 1 on the next page.

Table 2 below details the Conditions of Consent that were classified as "Non-compliant" during the Independent Audit conducted on 8-9 June 2021, and a status update on close out actions.

Table 3 below details the Conditions of Consent that were classified as "Non-compliant" during the Independent Audit conducted on 2 December 2020, and a status update on close out actions.

Table 4 below details the Conditions of Consent that were classified as "Non-compliant" during the Independent Audit conducted on 23-34 June 2020, and a status update on close out actions.

Table 1 – N	Table 1 – Non-Compliances Identified in Independent Audit IEA#4 (12 September 2022)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status		
A22	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 or approved) publicly available on its website: 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 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 specifications in any conditions of this consent, or any approved plans and programs; b) keep such information up to date, to the satisfaction of the	CCR 3 not on website Not all up to date revisions of management plans are on website. Construction monitoring results to 30 June 2021. Last 12 months reporting not yet summarised and reported.	Update website Complete noise and vibration monitoring report and provide information of website.	The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed		

Table 1 – Non-Compliances Identified in Independent Audit IEA#4 (12 September 2022)					
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:	Three complaints were received in relation to deliveries being undertaken out of hours: 26/06/20221- concrete delivery after 10:30pm 28/06/2021 - float out of piling rig at 3:30am 19/02/2022 - road furniture reinstatement at 4am	Complaints closed out - no further action	No Action Non-compliance status: Closed	Closed
C15	All construction vehicles (excluding worker 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 before stopping unless directed by traffic control. A construction zone is not permitted on High Street.	One complaint received: 28/06/2021 - float out tuck parked on Hospital road from 2:30am to 3:30am	Compliant closed out – no further action	No Action Non-compliance status: Closed	

Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
C19	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 conditions C4 and C7.	Refer C4 and C15	Ensure vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work	Some out of hours deliveries are required due to restrictions in travelling hours for over size deliveries such as piling rig floats and bridges. The road furniture reinstatement complaint was following the transportation of a bridge section through the area earlier in the night and was required to be reinstated for traffic safety. Closed.	Closed
C21	Ensure vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work	Vibration data not provided for July 2021 to June 2022. The auditor was advised that the Vibration Monitoring report had not yet been completed for this period.	Complete Noise and Vibration Monitoring Report	Noise and vibration monitoring is now complete. The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed

Table 2 — Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)					
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
А9	The project may be constructed and operated in st ages. Where staged construction or operation is proposed, a Staging Report (for either or both cons truction and operation as the case may be) must be prepared and submitted for the approval of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	A Staging Report has been prep ared for the construction phase and submitted to DPE on 10/1 2/2020. DPE requested further information and clarification. This was provided and is currently awaiting DPE approval. Note, the project had already commen ced construction when the Staging Report was is sued.	No Action	No Action Non-compliance status: Closed	Closed
A14	The Planning Secretary must approve any strategy, plan or program prepared in accordance with con dition A13 where previously approved by the Plann ing Secretary under this consent.	None of the revised MP's have been submitted to DPE for appr oval	Submit management plans do DPE	Management Plans submitted to DPE and records of this submitted to auditor. Refer to LL-GCOR-039952 on 23 June 2021 Non-compliance status: Closed	Closed

Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)					
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
A22	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 or approved) publicly available on its website: ii) all current statutory approvals for the development;	The Mod 1 Conditions of Conse nt and Notice of Decision are n ot located on the project's we bsite.	Upload to website	Project has updated the website Non-compliance status: Closed	Closed
A22	At least 48 hours before the commencement of co nstruction until the completion of all works under t his consent, or such other time as agreed by the PI anning Secretary, the Applicant must: make the following information and documen ts (as they are obtained or approved) publicly available on its website: iii) all approved strategies, plans a nd programs required under th e conditions of this consent;	All relevant plans, strategies an d programs were located on th e website including CEMP, CNV MSP, CWMSP, CSWMP, CTPMP, CWTS, RAP. However, the most recent versi on of the CEMP, CTPMP, CNVM P, CWMP, CSEMP were not available on the website	Upload to website	Project website has latest management plans and sub-plans uploaded on to the website as per the current audit period. Non-compliance status: Closed	Closed

Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)					
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
A22	At least 48 hours before the commencement of co nstruction until the completion of all works under this consent, or such other time as agreed by the Pl anning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: 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;	Monitoring reports are due to b e uploaded every 6 months. No monitoring reports are availabl e on the website.	Upload to website	Noise and vibration monitoring is now complete. The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed
A22	At least 48 hours before the commencement of co nstruction until the completion of all works under t his consent, or such other time as agreed by the Pl anning Secretary, the Applicant must: (a) make the following information and docu ments (as they are obtained or approved) publicly available on its website: v) a comprehensive summary of t he monitoring results of the de velopment, reported in accord ance with the specifications in any conditions of this consent, or any approved plans and pro grams;	Monitoring results are uploade d 6 monthly. Only the monitoring r eport template is on the websit e. Note, the noise, dust and vib ration monitoring being conducted for SSD 10339 are the same as for SSD 9113, which are available on the ASB website.	Upload to website	Noise and vibration monitoring is now complete. The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed

Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
A22	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: (b) keep such information up to date, to the satisfaction of the Planning Secretary.	The most recent version of the Conditions of Consent, Monitor ing Reports and Management P lans were not available on the website	Upload to website	Noise and vibration monitoring is now complete. The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed	
A29	Revision of Strategies, Plans and Programs If necessary, to either improve the environmental performance of the development, cater for a modification, or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifying Authority. Where revisions are required, the revised document must be submitted to the Planning Secretary Certifying Authority for approval within six weeks of the review. 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.	The Management Plan Review Schedule notes that notification to the Department and PCA did not occur prior to the reviews up until December 2020. Notification to the Certifier for the December 2020 reviews was issued 10/12/2020. Notification to DPE for the December 2020 reviews was issued 17/12/2020 Notification to the Certifier for the March 2021 reviews was issued 25/3/2021. Notification to DPE for the March 2021 reviews was issued 31/3/2021 Revised management plans were approved by the Certifier in CC3.		Management plans are submitted accordingly as per references made by the auditor in the last audit period. Non-compliance status: Closed		

Table 2 – Nor	Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status		
B3	Prior to the commencement of construction, the A pplicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with the relevant clauses of the BCA and this development consent	by the Certificate 1 was issued by the Certifier. CC1 included the Structural Drawings RCR-ENS-STR-50-DRW-000-00, RCR-ENS-STR-50-DRW-001-00, RCR-ENS-STR-50-DRW-003-37 and RCR-ENS-STR-50-DRW-003-37 and RCR-ENS-STR-50-SPC-0001, covering the foundation sections and details. These drawings were certified by James Reynolds from Enstruct as being in accordance with the BCA and Australian standards. The NER search validates James Reynolds as a suitably qualified practising Structural Engineer. Crown Certificate 2 was issued by the Certifier. CC2 included Structural Drawings for a number of elements of the building including piling and retention structures. These drawings were certified by James Reynolds on 28 July 2020. CC2 also included the structural piling design certificate for piling work. These drawings were certified by Stephen Hutchings. The NER search validates Stephen Hutchings as a suitably qualified practising Structural Engineer. Crown Certificate 3 was issued by the Certificate 3 was issued by the Certifier. CC3 included Structural Drawings for a number of elements of the building the patient bridge and Level -		All structural drawings to date have been prepared and signed by a suitably qualified structural engineer and submitted to the certifier with a drawing set and design certification – as per Auditors notes in the last audit period. Non-compliance status: Closed	Closed		

Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
		O1. These drawings were certified by James Reynolds on 18 December 2020. Structural drawings for the remainder of the building have not yet been completed.				
B30	Compliance Reports of the development must be s ubmitted to the Planning Secretary in accordance with timing outlined in the Compliance Monitoring and Reporting Schedule.	The Preconstruction Compliance Report was issued within the timeframe stipulated in the Schedule The Construction Compliance Report was not issued in accordance with the timeframe stipulated in the Schedule. The Construction Compliance Report was due in September 20 20, but wassubmitted in December 2020. An RFI was received from DPE, and an extension to time was granted by DPE on the response to the RFI to 5/3/2021. Response to the RFI is detailed in B35.		This condition is compliant in current period, non-compliance was for the last period – as per Auditors notes. Non-compliance status: Closed	Closed	

Table 2 – Non-Compliances Identified in Independent Audit IEA#3 (8 and 9 June 2021)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
B31	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	The Preconstruction Complianc e Report is available on the we bsiteThe Construction Complia nce Report is not available on the website	Update the website	Project has uploaded the compliance report CCR #2 to the website. Non-compliance status: Closed	Closed	
B35	Prior to the commencement of earthworks, the Ap plicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B11 and must ensure any material identified as contaminated must be disposed offsite, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site	An Unexpected Finds Protocol f or contamination is included in the RAP and CEMP. Five unexpected contaminated finds have occurred since the st art of construction (15/5/20, 29/7/20, 1/9/20, 30/9/20, 18/11/20 and 14/5/21). DPE were notified of the UF 15/5 and issued with the waste classification report. DPE were not ified of the finds 29/7-18/11 after the last IEA. PWC were notified on 14/5 with test results sent on 20/5. DPE notification has not occurred	Send notification to DPE	Project to send notification to DPE		

Table 3 – Non-Compliances Identified in Independent Audit IEA#2 (2 December 2020)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
A22	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 or approved) publicly available on its website: iii) 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 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 specifications in any conditions of this consent, or any approved plans and programs; b) keep such information up to date, to the satisfaction of the Planning Secretary.	The Mod 1 Conditions of Consent and Notice of Decision are not located on the project's website. The most recent version of the CEMP, CTPMP, CNVMP, CWMP, CSEMP were not available on the website" Monitoring reports are due to be uploaded every 6 months. No monitoring reports are available on the website. Monitoring results are uploaded 6-monthly. Only the monitoring report template is on the website. Note, the noise, dust and vibration monitoring being conducted for SSD 10339 are the same as for SSD 9113, which are available on the ASB website. The most recent version of the Conditions of Consent, Monitoring Reports and Management Plans were not available on the website	Ensure up to date information about the project is maintained on the project's website, including management plans and monitoring reports.	The website (planning portal) should be updated by the Project Team with the most recent plans, programs and strategies. Lendlease has provided all updated documents to Health Infrastructure to be uploaded on to the portal. Action to be taken: Project Team will update the portal accordingly.	Closed	

Table 3 – Non-Compliances Identified in Independent Audit IEA#2 (2 December 2020)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
A29	Within three months of: a) the submission of a compliance report under condition B30; b) the submission of an incident report under condition A25; c) the submission of an Independent Audit under condition C41; d) the approval of any modification of the conditions of this consent; or e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, "the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifier must be notified in writing that a review is being carried out. If necessary, to either improve the environmental performance of the development, cater for a modification, or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifier. Where revisions are required, the revised document must be submitted to the Certifier for approval within six weeks of the review."	Notification to the Department and PCA did not occur prior to any of the reviews conducted to date	No action required.	Documentation review and updates to be submitted within the required review period following the IA#2 trigger date and in line with the Management tracking document. Non-Compliance Status: Closed	Closed	

Table 3 – Non-Compliances Identified in Independent Audit IEA#2 (2 December 2020)						
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status	
B30	Compliance Reports of the development must be submitted to the Planning Secretary in accordance with timing outlined in the Compliance Monitoring and Reporting Schedule.	The Construction Compliance Report was not issued in accordance with the timeframe stipulated in the Schedule. The Construction Compliance Report was due in September 2020. An extension to time was requested from DPE, which to date had not been granted. The CCR is currently in Final Draft and is intended to be submitted soon.	Complete the CCR and submit to DPE	CCR#1 submitted to PCA and DPE on 11 th December 2020 Ref ACONEX LL-GCOR-029663 Filename: SSDA 10339 - CC1 -Construction Compliance Report Rev 1.pdf Sent to HI by email dated 11 th December 2020 [EXT]:RCR - SSD10339 - Construction Compliance Report #1 & IEA#2 Post Approval document from DPE received 11 th December by ACONEX PWCAU_GCOR-009306 Post Approval PA 17. Non-Compliance Status : Closed	Closed	
B35	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B11 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	Five unexpected contaminated finds have occurred since the start of construction (15/5/20, 29/7/20, 1/9/20, 30/9/20, 18/11/20). DPE were notified of the UF 15/5 and issued with the waste classification report. However, subsequent UF's were not notified to DPE.	Notify DPE of the disposal location and the test results for all unexpected contaminated finds	Further unexpected finds to be sent to DPE prior to removal from site.	Closed	

Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence			Status
				#	Date	Notification	
				UF#37	29/07/2020	Safework Notification # 943R- 00287045-02	
				UF#38	1/09/2020	Safework Notification # 940R- 00287831-01	
				UF#39	30/09/2020	N/A, removal was concurrent with UF#37 so additional Safework Notification not required for such a small amount of ACM.	
				UF#40	18/11/2020	N/A, material was identified at tip site and no further Asbestos was located on site following loads being rejected at the tip after found to contain asbestos.	

Table 4 – N					
Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence	Status
В3	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 practicing Structural Engineer that demonstrates compliance with the relevant clauses of the BCA and this development consent.	Crown Certificate 1 (CC1) was issued by the Certifier. CC1 included the Structural Drawings RCR-ENS-STR-50-DRW-000-00, RCR-ENS-STR-50-DRW-001-00, RCR-ENS-STR-50-DRW-003-37 and RCR-ENS-STR-50-SPC-00001, covering the foundation sections and details. These drawings were certified by Enstruct as being in accordance with the BCA and Australian Standards. The NER search validates the Enstruct Engineer as a suitably qualified practicing Structural Engineer. Structural drawings for the remainder of the building have not yet been completed, and therefore have not been certified nor submitted to the Certifier.	Notify DPE of non-compliance. No further action required.	DPE to be notified of non-compliance by letter under Condition A26. Timing for compliance with Condition B3 also to be addressed in a Staging Report to be submitted for approval under Condition A11. IA#2 confirmed no further action required. Non-Compliance Status: Closed	Closed