



**Health**  
Infrastructure

# **Proponent Response to Independent Audit Findings Randwick Campus Redevelopment Project**

**Integrated Acute Services Building  
State Significant Development (SSD) 10339**

**PWC**

[VERSION 1.0]

15 July 2021

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## Contents

Introduction ..... 3

    Project Name and Project Application Number ..... 3

    Site Address ..... 3

    Title and Revision Number ..... 3

    Date ..... 3

    Contact Details ..... 3

    Independent Audit Date ..... 3

    Independent Auditor ..... 4

    Proponent Respose ..... 4

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# Introduction

## Project Name and Project Application Number

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

## Site Address

Part Lot 1 DP870820 (Randwick Hospital Campus), Lot 6 DP13997 (71 Botany Street, Randwick), Lot A DP167106 (73 Botany Street Randwick), Lot B DP167106 (75 Botany Street, Randwick), Lot C DP167106 (77 Botany Street, Randwick), Lot D DP167106 (79 Botany Street, Randwick), Lot A DP33161 (81 Botany Street, Randwick), Lot B DP33161 (83 Botany Street, Randwick), Lot C DP33161 (85 Botany Street, Randwick), Lot D DP33161 (87 Botany Street, Randwick), Lot E DP33161 (89 Botany Street, Randwick), Lot F DP33161 (91 Botany Street, Randwick), Lot 1 DP741639 (93 Botany Street, Randwick), Lot 2 DP1134643 (95 Botany Street, Randwick), Lot A DP439101 (97 Botany Street, Randwick), Lot B DP439101 (99 Botany Street, Randwick) Lot 3 DP302329 (101 Botany Street, Randwick), Part Lot 2 DP13995 (27 Eurimbla Avenue, Randwick), Lot 3 DP13995 (29 Eurimbla Avenue, Randwick), Lot 4 DP13995 (31 Eurimbla Avenue, Randwick), Lot 5 DP13995 (33 Eurimbla Avenue, Randwick), Lot 6 DP13995 (35 Eurimbla Avenue, Randwick), Lot 7 DP13995 (37 Eurimbla Avenue, Randwick), Lot 8 DP13995 (39 Eurimbla Avenue, Randwick), Lot 9 DP13995 (41 Eurimbla Avenue, Randwick), Lot 10 DP13995 (43 Eurimbla Avenue, Randwick), Lot 11 DP13995 (45 Eurimbla Avenue, Randwick), Lot12 DP13995 (47 Eurimbla Avenue, Randwick), Lot 13 DP12909 (34 Eurimbla Avenue, Randwick), Lot 14 DP12909 (36 Eurimbla Avenue, Randwick), Lot B DP441943 (38 Eurimbla Avenue, Randwick), Lot A DP441943 (40 Eurimbla Avenue, Randwick), Lot 1 DP1182570 (42 Eurimbla Avenue, Randwick), Lot 2 DP1182570 (44 Eurimbla Avenue, Randwick), Lot 23A DP434935 (46 Eurimbla Avenue, Randwick), Lot 23B DP434935 (48 Eurimbla Avenue, Randwick), Lot 1 DP522596 (50 Eurimbla Avenue, Randwick), Lot 2 DP533596 (52 Eurimbla Avenue, Randwick), Lot 1 DP501682 (54 Eurimbla Avenue, Randwick), Lot 2 DP501682 (56 Eurimbla Avenue, Randwick), Lot 3 DP 513339 (58 Eurimbla Avenue, Randwick), Lot 4 DP513339 (60 Eurimbla Avenue, Randwick), Lot 19 DP7745 (62 Eurimbla Avenue, Randwick), Lot 18 DP7745 (64-64A Eurimbla Avenue, Randwick, Randwick), Lot 52 DP7745 (64R Eurimbla Avenue – Pedestrian walkway, Randwick), Lot 1 DP748060 (66 Eurimbla Avenue – also known as 6 Magill Street, Randwick), Lot 11 DP806091 (66A Eurimbla Avenue, Randwick), Lot 1 DP307266 (2 Magill Street, Randwick), Lot 12 DP806091 (4 Magill Street, Randwick), Lot Dp975640 (8-8A Magill Street, Randwick), Lot 1 DP11351 (10 Magill Street, Randwick), Lot 2 DP11351 (12 Magill Street, Randwick) Lot 3 DP11351 (14 Magill Street, Randwick)

## Title and Revision Number

Proponent Response to Independent Audit Findings (Version 1)

## Date

July 2021

## Contact Details

<b>Proponent</b>	Health Infrastructure
<b>Client Representative</b>	PwC
<b>Managing Contractor</b>	Lendlease Building

## Independent Audit Date

8<sup>th</sup> and 9<sup>th</sup> June 2021

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## Independent Auditor

NGH Pty Ltd

## Proponent Response

Table 1 below details the Conditions of Consent that were classified as “Non-compliant” during the Independent Environmental Audit conducted on 8<sup>th</sup> and 9<sup>th</sup> June 2021. 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 1 – Non-Compliances Identified in Independent Audit IEA#3 (8th and 9th June 2021)**

Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence
A9	The project may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction 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 prepared for the construction phase and submitted to DPIE on 10/12/2020. DPIE requested further information and clarification. This was provided and is currently awaiting DPIE approval. Note, the project had already commenced construction when the Staging Report was issued.	No Action	No Action
A14	The Planning Secretary must approve any strategy, plan or program prepared in accordance with condition A13 where previously approved by the Planning Secretary under this consent.	None of the revised MP's have been submitted to DPIE for approval	Submit management plans to DPIE	Management Plans submitted to DPIE and records of this submitted to auditor. Refer to LL-GCOR-039952 on 23 June 2021

A22	<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 or approved) publicly available on its website:</p> <p>ii) all current statutory approvals for the development;</p>	<p>The Mod 1 Conditions of Consent and Notice of Decision are not located on the project's website.</p>	<p>Upload to website</p>	<p>HI to update the website</p>
A22	<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>make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p>	<p>All relevant plans, strategies and programs were located on the website including CEMP, CNVMSP, CWMSP, CSWMP, CTPMP, CWTS, RAP. However, the most recent version of the CEMP, CTPMP, CNVMSP, CWMP, CSEMP were not available on the website</p>	<p>Upload to website</p>	<p>HI to update the website</p>
A22	<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 or approved) publicly available on its website:</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>Monitoring reports are due to be uploaded every 6 months. No monitoring reports are available on the website.</p>	<p>Upload to website</p>	<p>Updated monitoring report issue to HI. HI to update the website</p>

A22	<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 or approved) publicly available on its website:</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>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.</p>	<p>Upload to website</p>	<p>Updated monitoring report issue to HI. HI to update the website</p>
A22	<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>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>The most recent version of the Conditions of Consent, Monitoring Reports and Management Plans were not available on the website</p>	<p>Upload to website</p>	<p>HI to update the website</p>
A29	<p>Revision of Strategies, Plans and Programs</p> <p>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.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to</p>	<p>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 DPIE 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 DPIE for the March 2021 reviews was issued 31/3/2021</p>		<p>Management plans are submitted accordingly as per references made by the auditor in the last audit period.</p>

	improve the environmental performance of the development.	Revised management plans were approved by the Certifier in CC3.		
B3	<p>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 the relevant clauses of the BCA and this development consent</p>	<p>Crown 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-SPC-0001, covering the foundation sections and details. These drawings were certified by [REDACTED] from Enstruct as being in accordance with the BCA and Australian standards. The NER search validates [REDACTED] as a suitably qualified practising Structural Engineer.</p> <p>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 [REDACTED] on 28 July 2020. CC2 also included the structural piling design certificate for piling work. These drawings were certified by [REDACTED]. The NER search validates [REDACTED] as a suitably qualified practising Structural Engineer.</p> <p>Crown Certificate 3 was issued by the Certifier. CC3 included Structural Drawings for a number of elements of the building the patient bridge and Level - 01. These drawings were certified by [REDACTED] on 18 December 2020.</p> <p>Structural drawings for the remainder of the building have not yet been completed.</p>		<p>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</p>



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.	<p>The Pre-construction Compliance Report was issued within the timeframe stipulated in the Schedule</p> <p>The Construction Compliance Report was not issued in accordance with the timeframe stipulated in the Schedule.</p> <p>The Construction Compliance Report was due in September 2020, but was submitted in December 2020.</p> <p>An RFI was received from DPIE, and an extension to time was granted by DPIE on the response to the RFI to 5/3/2021. Response to the RFI is detailed in B35.</p>		This condition is compliant in current period, non-compliance was for the last period – as per Auditors notes.
B31	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	The Preconstruction Compliance Report is available on the website The Construction Compliance Report is not available on the website	Update the website	HI to update the website
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	<p>An Unexpected Finds Protocol for contamination is included in the RAP and CEMP.</p> <p>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 and 14/5/21).</p> <p>DPIE were notified of the UF 15/5 and issued with the waste classification report. DPIE were notified of the finds 29/7-18/11 after the last IEA. PWC were notified</p>	Send notification to DPIE	HI to send notification to DPIE

fied on 14/5 with test results sent on 20/5. DPIE notification has not occurred

**Table 2 – Non-Compliances Identified in Independent Audit IEA#2 (2<sup>nd</sup> December 2020)**

Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence
A22	<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 or approved) publicly available on its website:</p> <p>iii) all current statutory approvals for the development;</p> <p>iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>The Mod 1 Conditions of Consent and Notice of Decision are not located on the project's website.</p> <p>The most recent version of the CEMP, CTPMP, CNVMP, CWMP, CSEMP were not available on the website"</p> <p>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.</p> <p>The most recent version of the Conditions of Consent, Monitoring Reports and Management Plans were not available on the website</p>	<p>Ensure up to date information about the project is maintained on the project's website, including management plans and monitoring reports.</p>	<p>Updated Plans, Strategies and reports are to be loaded to the project website in line with the next review period anticipated by 24<sup>th</sup> December 2020.</p> <p>Non-Compliance Status: Open</p>

A29	<p>Within three months of:</p> <p>a) the submission of a compliance report under condition B30;</p> <p>b) the submission of an incident report under condition A25;</p> <p>c) the submission of an Independent Audit under condition C41;</p> <p>d) the approval of any modification of the conditions of this consent; or</p> <p>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."</p>	<p>Notification to the Department and PCA did not occur prior to any of the reviews conducted to date</p>	<p>No action required.</p>	<p>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.</p> <p>Non-Compliance Status: Closed</p>
B30	<p>Compliance Reports of the development must be submitted to the Planning Secretary in accordance with timing outlined in the Compliance Monitoring and Reporting Schedule.</p>	<p>The Construction Compliance Report was not issued in accordance with the timeframe stipulated in the Schedule.</p> <p>The Construction Compliance Report was due in September 2020. An extension to time was requested from DPIE, which to date had not been granted. The CCR is currently in Final Draft and is intended to be submitted soon.</p>	<p>Complete the CCR and submit to DPIE</p>	<p>CCR#1 submitted to PCA and DPIE on 11<sup>th</sup> December 2020  Ref ACONEX LL-GCOR-029663  Filename: <i>SSDA 10339 - CC1 -Construction Compliance Report Rev 1.pdf</i>  Sent to HI by email dated 11<sup>th</sup> December 2020  [EXT]:RCR - SSD10339 - Construction Compliance Report #1 &amp; IEA#2  Post Approval document from DPIE received 11<sup>th</sup> December by ACONEX PWCAU_GCOR-009306 Post Approval PA 17.  <b>Non-Compliance Status : Closed</b></p>

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). DPIE were notified of the UF 15/5 and issued with the waste classification report. However, subsequent UF's were not notified to DPIE.	Notify DPIE of the disposal location and the test results for all unexpected contaminated finds	<p>Further unexpected finds to be sent to DPIE prior to removal from site. No action proposed for the unexpected finds to date.</p> <table border="1" data-bbox="1529 288 2114 831"> <thead> <tr> <th>#</th> <th>Date</th> <th>Notification</th> </tr> </thead> <tbody> <tr> <td>UF#37</td> <td>29/07/2020</td> <td>Safework Notification # 943R-00287045-02</td> </tr> <tr> <td>UF#38</td> <td>1/09/2020</td> <td>Safework Notification # 940R-00287831-01</td> </tr> <tr> <td>UF#39</td> <td>30/09/2020</td> <td>N/A, removal was concurrent with UF#37 so additional Safework Notification not required for such a small amount of ACM.</td> </tr> <tr> <td>UF#40</td> <td>18/11/2020</td> <td>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.</td> </tr> </tbody> </table> <p><b>Non-Compliance Status : Closed</b></p>	#	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.
#	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 3 – Non-Compliances Identified in Independent Audit IEA#2 (23-24 June 2020)

Condition of Approval	Requirement	Details of Non-compliance	Auditor Recommended Action	Action / Timing / Evidence
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<p>B3</p>	<p>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.</p>	<p>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.</p> <p>Structural drawings for the remainder of the building have not yet been completed, and therefore have not been certified nor submitted to the Certifier.</p>	<p>Notify DPIE of non-compliance. No further action required.</p>	<p>DPIE 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. <b>Non-Compliance Status : Closed</b></p>
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