

HEALTH INFRASTRUCTURE

Independent Audit – Proponent review and response

SSD-56989722 Eurobodalla Regional Hospital

10 February 2025

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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Document Management, Tracking and Revision History

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Draft	06/02/2025	Dan Humphries	Independent Audit – Proponent review and response - Draft	Sam Jeffrey	Sam Jeffrey
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Introduction

Project Application Number and Project Name

SSD-56989722, Eurobodalla Regional Hospital

Site Address

2901 Princes Highway, Moruya, 2537

Project Contact Details

Proponent	Health Infrastructure
Client Representative	Matthew Malone, Senior Project Director
Contractor	Multiplex

Independent Auditor

Richard Peterson - AtkinsRéalis

Independent Audit Date

29 November 2024

Proponent response

The Independent Audit Report prepared by AtkinsRéalis dated 23 January 2025 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.

Condition of Consent	Requirement (exact wording)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance - \$#
Condition B15	<p>Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and publish a copy of the CEMP on the Applicant's website in accordance with condition A25. The CEMP must include, but not be limited to, the following:</p> <p>(a) Details of:</p> <p>(i) hours of work;</p> <p>(ii) 24-hour contact details of site manager;</p> <p>(iii) management of dust and odour to protect the amenity of the neighbourhood;</p> <p>(iv) stormwater control and discharge;</p> <p>(v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</p> <p>(vi) fencing to be installed to restrict access within 10m of any on-site riparian watercourse; and</p> <p>(vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p>	<p>The CEMP was provided to the Certifier on the 11/9/24 and is available on the project website.</p> <ul style="list-style-type: none"> Section 12.1.2 of the CEMP provides details of hours of work The CEMP doesn't include the 24-hour contact details of the site manager Section 13.2 of the CEMP includes details of the Dust and Air Quality Objectives; dust is the main focus however there is limited information on odour control (such as odour emanating from site/septic facilities) Items (iv- v) are addressed by Sections 13.3 and 13.4 Item vii has not been addressed. 	<p>Update the CEMP to include:</p> <ul style="list-style-type: none"> the 24-hour contact details of the site manager management measures to minimise any potential odour impacts from the site amenities Details of any external lighting to ensure compliance with AS 4282-2019 Reference to the DPIE Environmental Management Plan Guideline as recommended in Condition B15 above. Noisy work approved hours as required by C16 <p><i>Subsequent to the Audit, the CEMP has been updated to address this non-compliance.</i></p> <ul style="list-style-type: none"> 24-hour contact details of the site manager is included on p9 and Appendix 7 p123. Management measures for potential odour impacts is included in Section 13.2, p39 Certificate ensuring external lighting is in compliance with AS 4282-2019 is included in Appendix 17 p477. DPIE Environmental Management Plan Guideline included in section 1.8.1 p4. C16 refers to vibration. No works will cause vibration concerns until road construction for connection into Caswell Street, which has yet to commence. Vibration monitoring has been set up 	Non-compliant	NC1

			<i>close to potential noise receivers and no consistent vibrations impacting residents has ben picked up.</i>		
Condition B14	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).	Section 1.8 of the CEMP identifies the relevant acts that apply to the project, however, does not include reference to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects	Update Section 1.8 of the CEMP to include reference to the DPIE Environmental Management Plan Guideline. <i>Subsequent to the Audit, the CEMP has been updated to address this observation:</i> <ul style="list-style-type: none"> DPIE Environmental Management Plan Guideline included in section 1.8.1 p4. 	Observation	OFI1
Condition B18	The Construction Waste Management Sub-Plan (CWSMP) must address, but not be limited to, the procedures for the management of waste including the following: <ol style="list-style-type: none"> 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; information regarding the recycling and disposal locations; and confirmation of the contamination status of the development areas of the site based on the validation results. 	The CWSMP contents address the requirements of this condition as follows: <ul style="list-style-type: none"> Recording of quantities (section 3.3) Waste classifications (section 2.5) Recycling (sections 3 and 5) Validation and confirmation of contamination status (section 4.2) Section 5 of the waste management plan documents the onsite disposal locations; however the waste management plan does not document the offsite waste disposal locations	Update the waste management plan so the offsite waste disposal locations are documented when they are confirmed. <i>Next steps to address this observation:</i> <i>The waste management plan will be updated when the locations are confirmed. This will take place within 6 months, prior to the next audit.</i>	Observation	OFI2
Condition B20	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: <ol style="list-style-type: none"> minimise the impacts of earthworks and construction on the local and regional road network; minimise conflicts with other road users; minimise road traffic noise; and ensure truck drivers use specified routes. 	The driver code of conduct is included as part of the CTMP and contains relevant information. During the audit period one complaint was received in relation to the turning of a vehicle in Mollee Road as opposed to Noads Road	The actions taken in response to the complaint are deemed to be appropriate, a further recommendation is made to update the driver code of conduct to document the correct turning location in Noads Road. <i>Subsequent to the Audit, the CEMP has been updated to address this observation:</i> <ul style="list-style-type: none"> CEMP updated including Driver Code of Conduct (Section 5.3 p178) 	Observation	OFI3
Condition B22	Prior to the commencement of construction, the Applicant must:	As observed during the site inspection, erosion and sediment controls that are consistent with the "Blue	Install advisory signage at the sediment basin discharge points to ensure all	Observation	OFI4

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| <p>a. install erosion and sediment controls on the site to manage wet weather events; and</p> <p>b. divert existing clean surface water around operational areas of the site.</p> | <p>Book” requirements were installed and effectively maintained.</p> | <p>personnel are aware of the mandatory requirement to obtain a permit prior to discharging water off site.</p> |
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Next steps to address this observation:
Advisory signage to be installed by
Multiplex at the sediment basin discharge
points by end-February.

Condition C8	<p>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:</p> <ul style="list-style-type: none"> a. 9am to 12pm, Monday to Friday; b. 2pm to 5pm Monday to Friday; and c. 9am to 12pm, Saturday. 	<p>During the audit period, a granite boulder required removal with the use of rock breakers. Affected residents were notified via works notification dated 20/8/24 advising that the work would commence on the 23/8/24 and be completed by the 31/10/24. The notification noted that the work would be undertaken only between 9am and 12pm and 2pm to 5pm Monday to Friday.</p> <p>The approved hours for these high noise activities are not documented in the CEMP (section 13.1.2) or the site induction</p>	<p>Update the CEMP and the site induction to include these restricted hours for noisy works.</p> <p><i>Subsequent to the Audit, the CEMP has been updated to address this observation:</i></p> <ul style="list-style-type: none"> • <i>CEMP updated (section 1.8.3, p11) demonstrating its inclusion in site induction. Also included in 13.1.2, p 36.</i> 	Observation	OF15
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