



3 July 2024

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Fishburn,

**Re: SSD-44034342 – Westmead Integrated Mental Health Complex
Conditions C44 & C45 – Independent Environmental Audit**

Reference is made to the above-mentioned State Significant Development consent. In accordance with the requirements of Conditions C44 and C45 please find attached the project's first Independent Environmental Audit (IEA) #1 and the Proponent Review and Response document.

The Audit has been undertaken having regard to the requirements of the Department of Planning, Housing and Infrastructure's *Independent Audit Post Approval Requirements* [2020] document and relevant conditions of the consent.

As is required by condition C44(c) a copy of the attached documents will be made publicly available on the project's website within 60 days of this submission to the Planning Secretary. Non-compliances identified within the IEA will be notified to the Planning Secretary under separate cover letter.

Should you have any queries regarding the above, please do not hesitate to contact the undersigned on mobile 0400 403 997 or via email at kathryn.saunders@health.nsw.gov.au

Yours sincerely,

Kathryn Saunders
Senior Advisor, Town Planning (Post Approval & Compliance)

List of Attachments

- 1. Independent Environment Audit #1, Revision Final V0, dated 27 June 2024**
- 2. IEA#1 Proponent Review and Response document, dated 2 July 2024.**

HEALTH INFRASTRUCTURE

Independent Environmental Audit (IEA#1) – Proponent review and response

SSD-44034342 – Westmead Integrated Mental Health Complex

2 July 2024

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	
Author:	Dimitra Rousounidou
Position:	Project Manager
Company:	TSA Riley
Date:	2 July 2024

Document Management, Tracking and Revision History

Version	Date	Author	Description
Final	02/07	Dimitra Rousounidou	Independent Audit – Proponent review and response

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Introduction

Project Application Number and Project Name

SSD-44034342, Westmead Integrated Mental Health Complex

Site Address

Westmead Hospital Campus, Hawkesbury Road, Westmead (Lot 1 in DP1194390 and Lot 4 in DP1077852)

Project Contact Details

Proponent	Health Infrastructure
Client Representative	TSA Riley
Contractor	Roberts Co

Independent Auditor

The APP Group, Lead Environmental Auditor, Barbara Pater

Independent Audit Date

22 May 2024. Audit period from Commencement on 4 March to 22 May 2024

Proponent response

The Independent Audit Report prepared by The APP Group dated 27 June 2024 (version Final V0), 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)	Independent Audit Findings and Recommendations	Proposed action/action taken or response to resolve matter	Unique Identification on Noncompliance - \$#
A2	<p>A2: Terms of Consent (a) The development may only be carried out: a. in compliance with the conditions of this consent</p>	<p>Based on the non-compliances identified during the audit, this triggers a non-compliance against Condition A2(a). Close out of the identified non-compliances will automatically address this finding.</p>	<p>The project team will address the non-compliance as detailed within this table.</p>	01-NC-01
A23	<p>A23: Access to Information At least 48 hours before the commencement of construction 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: (i) ... to (x).... and 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>At the time of the audit, not all information/documentation was uploaded as required by Condition A23. This triggers a non-compliance against Condition A23. It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23.</p>	<p>The project team has uploaded a package of documents to the project's website in satisfaction of A23, and subsequently addressed the identified related non-compliances with conditions B12 and B20. The project team has implemented a process as part of the project's monthly meetings, to ensure the project website is maintained as required.</p>	01-NC-02
B12	<p>B12: Construction Environmental Management Plan 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 A23.</p>	<p>The Project EMP had not been uploaded on the project website as required by Condition B12. It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B12.</p>	<p>Please refer to action under 01-NC-02.</p>	01-NC-03
B20	<p>B20: Construction Parking Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be published on the Applicant's website in accordance with condition A34. This condition cannot be staged.</p>	<p>The Construction Management Plan, which includes the Construction Worker Transportation Strategy was not included on the project website which is a requirement of Condition B20. It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B20.</p>	<p>Please refer to action under 01-NC-02.</p>	01-NC-04

Health Infrastructure: Independent Environmental Audit (IEA#1) – Proponent review and response

C38	<p>C38: Site Contamination</p> <p>Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.</p>	<p>The Material Tracking Register presented did not fully address all the requirements as per RAP Section 9.6.</p> <p>It is recommended to further develop the existing material tracking register to fully meet the requirements of the RAP.</p>	<p>The project team is currently updating the Material Tracking Register to address all matters within Section 9.6 of the RAP. This action is still ongoing and anticipated to be completed in the next fortnight.</p>	01-NC-05
Opportunities for Improvement				
Condition of Consent	Requirement (exact wording)	Independent Audit Findings and Recommendations	Proposed action/action taken or response to resolve matter	Unique Identification on Opportunity for Improvement
C10	<p>C10: Implementation of Management Plans</p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub- Plans).</p>	<p>During the site inspection, a truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water.</p> <p>There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / toolbox to be actioned to ensure workers are compliant with this process.</p>	<p>The issue was addressed on site with additional too box talk conducted to ensure workers understand and are compliant with the process.</p>	01-OFI-01
C14	<p>C14: Construction Noise Limits</p> <p>The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (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 V bration Management Plan.</p>	<p>Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorptive surface facing outwards.</p> <p>There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.</p>	<p>Installation of noise blankets will be conducted in line with the suppliers requirements and specifications. The works in the location identified during the Audit site visit have now been completed and handed over</p>	01-OFI-02
C38	<p>C38: Site Contamination</p> <p>Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.</p>	<p>During the site inspection, dedicated signage was not present for stockpiled materials.</p> <p>It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled.</p>	<p>Site team have been instructed to provide appropriate signage to materials being stockpiled across the site.</p>	01-OFI-03
C38	<p>As above.</p>	<p>The height of the installed airborne asbestos monitors did not appear to be within breathing height range.</p> <p>It is recommended their placement be reviewed with the onsite hygienist.</p>	<p>The onsite hygienist confirmed that the type of monitor and placement was effective and not impacting its performance.</p>	01-OFI-04

C38	As above.	<p>During the site inspection it was observed that asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary.</p> <p>It is recommended to reconsider the placement of exclusion zone boundary with the onsite hygienist to ensure adequate distances are maintained.</p>	<p>Confirmation was provided by the contractor and onsite hygienist that the exclusion zone is considered sufficient noting that the machinery highlighted at the time of the Audit site visit was idle and not in operation. Notwithstanding, works on site are undertaken in line with the requirements of the RAP.</p>	01-OFI-05
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Integrated Mental Health Complex (IMHC)

Assessment of Environmental System Compliance in accordance with SSD-44034342 Development Consent

Audit Reference:	IMHC-SSD-01
Audit Organisation:	Roberts Co. Pty Ltd (Contractor) TSA Management (Project Manager) Health Infrastructure (Proponent)
Auditors:	Barbara Pater, APP (Lead Auditor) Dylan Jones, APP (SME)
Date of Audit:	22-23 May 2024
Draft Report Submitted:	19 June 2024
Final Report Submitted:	27 June 2024



Distribution and Authorisation Record

Revision No.	Date	Issued to	Comments
Draft 1	19 June 2024	Dimitra Rousounidou, TSA Management	Initial draft for HI review
Final V0	27 June 2024	Dimitra Rousounidou, TSA Management	Final for issue

This report has been prepared and reviewed in accordance with our quality control system.

This report has been prepared by:

Barbara Pater

Lead Environmental Auditor

Date: 18 June 2024

Reviewed by:

Dylan Jones

Senior Environmental Consultant

Date: 18 June 2024

Finalised and issued by:

Barbara Pater

Lead Environmental Auditor

Date: 27 June 2024

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1. Executive Summary

The new Integrated Mental Health Complex (IMHC) at Westmead will involve the relocation and integration of key mental health services, currently provided on the Cumberland West campus and the Westmead Hospital, to a new Integrated Mental Health Complex (IMHC) on the Westmead Health and Education Precinct.

This Audit Report presents the outcomes of the initial independent environmental audit of the IMHC Early and Enabling Works (Package 4, Milestone 4) with assessment of environmental controls established by Roberts Co. against the requirements of State Significant Development conditions SSD-44034342 for the project, in accordance with the *Independent Audit Post Approval Requirements* (IAPAR 2020), and the project Staging Report (February 2024).

The audit was conducted by The APP Group – HSEQ Systems and Auditing (APP) on 22 & 23 May 2024 with a review of Schedule 2 Parts A, B, C, Advisory Notes and Incident Notification and Reporting Requirements of the SSD-44034342 consent conditions. As per the IAPAR 2020 requirements, the audit was undertaken within 12 weeks of commencement of construction, which was notified as 4 March 2024.

The audit covered the early and enabling works associated with Milestone 4 which involves bulk earthworks, piling, retention structures, HV conduit installation, diesel tank installation, trenching for inground hydraulic services, stormwater works, construction of a bioretention basin, and tree removal.

The outcome of the audit demonstrated that Roberts Co. have in place adequate controls to address environmental impacts. The following key strengths were noted:

- ▶ Disruption Notice process appeared well implemented and efficiently managed by both Roberts Co. and TSA.
- ▶ Use of RConstruct platform for close out of actions, induction records and general records keeping was to a high standard.
- ▶ Good management of friable asbestos removal onsite under a 'bubble' enclosure to contain potentially airborne material and segregate from non-friable areas.
- ▶ Site secured with hoarding in place to reduce visual impact within hospital grounds.
- ▶ Effective internal communication through the Site Notice Board onsite.
- ▶ Adopting launch pits and horizontal drilling methods for services installation resulted in considerably less impact to the upper fill layers which are contaminated with asbestos, thereby significantly reducing risks associated with handling and disturbing contaminated material.

The independent environmental audit assessed a total of 121 conditions, comprising of a review of documents and records, interviews of key personnel and a site inspection.

Site inspection

Five (5) observations were identified during the site inspection. Refer to [Section 6.4](#) for further details with photos included under [Appendix G](#).

Findings

A summary of the findings identified during the audit, including opportunities for improvement, are as follows:

Ref	Condition of Consent	Audit Finding
Non-Compliances		
IMHC-SSD-01-NC-01	<p>A2: Terms of Consent The development may only be carried out:</p> <p>a. in compliance with the conditions of this consent</p>	<p>Based on the non-compliances identified during the audit, this triggers a non-compliance against Condition A2(a).</p> <p>Close out of the identified non-compliances will automatically address this finding.</p>
IMHC-SSD-01-NC-02	<p>A23: Access to Information At least 48 hours before the commencement of construction 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: (i) to (x), and 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>At the time of the audit, not all information/documentation was uploaded as required by Condition A23. This triggers a non-compliance against Condition A23.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23.</p>
IMHC-SSD-01-NC-03	<p>B12: Construction Environmental Management Plan 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 A23.</p>	<p>The Project EMP had not been uploaded on the project website as required by Condition B12.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B12.</p>
IMHC-SSD-01-NC-04	<p>B20: Construction Parking Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be published on the Applicant's website in accordance with condition A34. This condition cannot be staged.</p>	<p>The Construction Management Plan, which includes the Construction Worker Transportation Strategy was not included on the project website which is a requirement of Condition B20.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B20.</p>
IMHC-SSD-01-NC-05	<p>C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.</p>	<p>The Material Tracking Register presented did not fully address all the requirements as per RAP Section 9.6.</p> <p>It is recommended to further develop the existing material tracking register to fully meet the requirements of the RAP.</p>

Ref	Condition of Consent	Audit Finding
Opportunities for Improvement		
IMHC-SSD-01-OFI-01	C10: Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	During the site inspection, a truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water. There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / toolbox to be actioned to ensure workers are compliant with this process.
IMHC-SSD-01-OFI-02	C14: Construction Noise Limits The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (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.	Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorptive surface facing outwards. There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.
IMHC-SSD-01-OFI-03	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	During the site inspection, dedicated signage was not present for stockpiled materials. It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled.
IMHC-SSD-01-OFI-04	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	The height of the installed airborne asbestos monitors did not appear to be within breathing height range. It is recommended their placement be reviewed with the onsite hygienist.
IMHC-SSD-01-OFI-05	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	During the site inspection it was observed that asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary. It is recommended to reconsider the placement of exclusion zone boundary with the onsite hygienist to ensure adequate distances are maintained.

Refer to [Section 6.8](#) and the Audit Checklist under [Appendix E](#) for further detail of these findings.

2. Introduction

2.1 Background

Health Infrastructure, working in partnership with Western Sydney Local Health District, will deliver a new Integrated Mental Health Complex (IMHC) at Westmead, involving the relocation and integration of key mental health services, currently provided on the Cumberland West campus and the Westmead Hospital, to a new Integrated Mental Health Complex (IMHC) on the Westmead Health and Education Precinct.

The IMHC will consist of five stages: Package 1 – additional car parking level at the Children’s Hospital Westmead Multi-Storey Car Park; Package 2 – Enabling Works to relocate existing Brain Injury Rehabilitation Unit (BIRS) facility into new accommodation; Package 3 – Refurbishment of Westmead Hospital’s existing Assets; Package 4 – the Integrated Mental Health Complex – Early Works; and Package 5 – Integrated Mental Health Complex – Main Works.

SSD-44034342 was approved on the 7 December 2023 for the construction and operation of the Integrated Mental Health Complex. The scope of this audit covered Milestone 4 (Package 4 Early Works) which involves:

- Bulk earthworks and Piling
- Retention structures.
- HV conduit installation.
- Diesel tank installation.
- Trenching for inground hydraulic.
- Stormwater works.
- Bioretention basin
- Tree removal.

Main works under SSD-44034342 (Package 5) had not yet commenced at the time of the audit and were not included as part of the scope of this audit.

As the Proponent, Health Infrastructure has engaged TSA Management (TSA) as the Project Manager for the IMHC Early Works project. Roberts Co. has been appointed by the Proponent through TSA to deliver Milestone 4 as part of Package 4.

Schedule 2 of the Development Consent SSD-44034342, states that:

- *Condition C41: Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.*
- *Condition C42: Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.*

TSA on behalf of the Proponent has therefore engaged The APP Group – HSEQ Systems and Auditing (APP) to undertake an independent environmental audit within 12 weeks of commencement of construction, in accordance with Schedule 2, Condition C41 of the Development Consent SSD-44034342 and the *Independent Audit Post Approval Requirements* (IAPAR 2020).

2.2 Project Details

Project Details	
Project Name	Integrated Mental Health Complex (IMHC)
Project Application No.:	SSD-44034342
Project Address:	Redbank Avenue, Westmead
Project Phase:	Early Works – Milestone 4
Project Activity Summary:	<p>The following is a summary of the works that were in progress at the time of audit:</p> <ul style="list-style-type: none"> • Bulk earthworks with bore hole construction underway. • Trenching for inground hydraulic services. • Stormwater works have commenced. • Piling will be upcoming end of May 2024 • Tree removal is now complete.

Table 1- Project Details

2.3 Audit Team

Details of The APP Group independent environmental auditing team as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Name	Company	Position	Certification
Barbara Pater	APP	Lead Environmental Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C424613

Table 2- Audit Team

The auditor approval letter from DPHI for this audit is attached as [Appendix C](#). Independent Audit declaration forms are included as [Appendix D](#).

As part of the audit, Barbara was accompanied by Dylan Jones, Exemplar Global Lead Environmental Auditor – Certificate No C-464532 who is a Senior Environmental Consultant and the team’s asbestos and contamination Subject Matter Expert.

3. Audit Objectives and Scope

3.1 Audit Objectives

The objective of this audit was to undertake the first independent environmental review of the project in compliance with Development Consent Schedule 2, SSD-44034342 Condition C41, in accordance with the requirements for an independent audit methodology and independent audit report as defined within the *Independent Audit Post Approval Requirements (IAPAR 2020)*.

3.2 Audit Scope

The scope of this audit comprised a review of the Project compliance with Schedule 2 SSD-44034342 conditions Parts A, B, C, Advisory Notes, and Incident & Reporting Requirements, including the following:

- ▶ Review of implementation of management plans,
- ▶ Site inspection conducted on the 23 May 2024
- ▶ Review of the environmental performance on the project
- ▶ Review of environmental records
- ▶ Interviews with site personnel
- ▶ Consultation with stakeholders.

3.3 Audit Period

This was the first independent environmental audit of the project carried out by APP, covering the review of environmental documentation and records within 12 weeks of commencement of construction, as notified as 4 March 2024.

It is noted that this report is based on the result of sampling and supplied documentation and records, as well as activities sighted on the dates of the audit, 22 and 23 May 2024, as well as additional documentation received 28 May 2024.

4. Audit Methodology

4.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is included under [Appendix C](#).

4.2 Audit Scope Development

APP developed the audit scope and a checklist based on the Project Requirements set out in the Development Consent SSD-44034342, Schedule 2 – refer to [Appendix E](#) of this report. Consultation with project stakeholders was also undertaken as part of the scope development as per [Section 4.6](#).

4.3 Audit Process

4.3.1 Opening Meeting

An opening meeting was held with personnel from Roberts Co. and TSA as per the Audit Attendance Sheet ([Appendix B](#)) on 22 May 2024 at 9:30am.

Key items were discussed as follows:

- ▶ Confirmation of the purpose and scope of the audit
- ▶ Overview of the Project and status of the works
- ▶ Occurrence of environmental incidents and non-compliances, if applicable
- ▶ Overview of the audit process in accordance with the Schedule 2 Consent Conditions and the *Independent Audit Post Approval Requirements* (IAPAR 2020).

4.3.2 Conduct of Audit

Audit activities included the following:

- ▶ Review of the project documentation (Project EMP and its Sub-Plans) to verify compliance with the SSD-44034342 Schedule 2 conditions,
- ▶ Conduct of a site walk led by Roberts Co. and Cherrie Civil to review implementation of mitigation measures and environmental controls.
- ▶ Conduct of the audit based on the checklist with the Conditions of Consent, interviews with personnel and review of records provided as evidence of compliance, and
- ▶ Discussion of any identified findings and actions noted during the site inspection.

4.3.3 Closing Meeting

The closing meeting was held on 23 May 2024 at 2:40pm with representatives of Roberts Co., TSA, Health Infrastructure, and APP. General feedback and the audit findings were discussed during the closing meeting.

The APP auditors acknowledged the efforts made in preparing for the audit, cooperation, and openness of Roberts Co. and TSA personnel during the conduct of this audit.

4.4 Interviewed Persons

Name and position of persons interviewed:

Name	Organisation	Position
Jennifer Dang	Roberts Co.	Project Engineer
Ollie Harrison	Roberts Co.	Cadet
Dimitra Rousounidou	TSA	Project Manager
Jonathan Tat	Cherrie Civil	Project Manager

Table 3- Personnel Interviewed

4.5 Site Inspection

A site inspection was carried out on 23 May 2024 at 9:45am with representatives of Roberts Co., Cherrie Civil, TSA, and APP. Five (5) observations were identified during the site inspection. Refer to details of the inspection in [Section 6.4](#) of this report and site photos included under [Appendix G](#).

4.6 Consultation

A consultation request was sent via email to the Department of Planning, Housing and Infrastructure (DPHI) in advance of the audit to request feedback on the project as per IAPAR 2020 Section 3.2.

As part of their response, DPHI requested a review of the adequacy of the CEMP and Sub-Plans and implementation, with a particular focus on the effectiveness of implementation of tree protection measures, noise management measures, complaints handling procedures and erosion and sedimentation (ERSED) measures.

Additionally, DPHI requested that the NSW EPA-accredited Site Auditor be consulted in relation the management of contaminated areas on site, with an additional request to apply focus on conditions to the management of contaminated areas, and if deemed necessary, interview the Site Auditor as part of the audit.

DPHI also requested that the City of Parramatta be consulted for their feedback into the scope of the audit.

4.6.1 APP Response

In response to the Department’s consultation request, APP has addressed the following:

Request	How addressed
<p>Review of the adequacy of the CEMP and Sub-Plans and its implementation is undertaken, with a particular focus on the effectiveness of implementation of tree protection measures, noise management measures, complaints handling procedures and ERSED measures.</p>	<p>A detailed review of the Project Environmental Management Plan and Sub-Plans was undertaken during the audit to verify compliance with the conditions and reference documents including the <i>Environmental Management Plan Guidelines 2020</i>. Refer to compliance achieved within the audit checklist Appendix E. Only three complaints have been received on the project which have been addressed and closed out, however these fall under the REF Approval for Milestones 1 to 3. During the site inspection, a focus was placed on tree protection measures, noise management, and erosion and sedimentation controls. Improvement opportunities were raised following observations made on site. Refer to Section 6.4 (site inspection), Section 6.8 (Audit Findings), with photos included under Appendix G of this report.</p>
<p>Consult with the EPA accredited site auditor in relation the management of contaminated areas on site. If necessary, interview the EPA accredited site auditor as part of the audit.</p>	<p>Senversa has been engaged as the EPA Accredited Site Auditor. A phone call and follow up email was actioned on 17 May 2024, prior to the audit, however, no response was received. Refer to a copy of the consultation included under Appendix F.</p>
<p>Focus on conditions relating to management of contaminated areas.</p>	<p>Due to the heavily contaminated site conditions, the approved lead auditor (Barbara Pater) was accompanied by Dylan Jones who has a background in asbestos and contaminated land management (SafeWork NSW Licensed Asbestos Assessor #LAA001425). During the 2nd day of the audit (23 May 2024), there was a focus on the associated contamination conditions (refer to Audit Agenda included as Appendix A). The site inspection was also scheduled this day to verify implementation of the Remedial Action Plan and Asbestos Management Plan. Findings were raised following observations made on site. Refer to Section 6.4 (site inspection), Section 6.8 (Audit Findings), with photos included under Appendix G of this report.</p>
<p>Consult generally in relation to the project with the City of Parramatta</p>	<p>The City of Parramatta Council was consulted on the 15 May 2024. No response was received. Refer to a copy of the consultation included under Appendix F.</p>

4.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Rating	Description
Compliant	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.
Non-Compliant	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.
Not Triggered	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.

Table 4- Audit Criteria

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

5. Document Review

- BCA Crown Design Verification Certificate # 2 for Milestone 4: CDVC#2 issued by Philip Chun Certifier, 21 February 2024.
- Staging Plan by TSA Management, V0.3 dated February 2024
- Environmental Management Plan, Cumberland West Mental Health Services Relocation Project – Early Works (CWMHRSR), Document Reference No. Pco-ENV-PLN-001, Rev 4, 17 November 2023
- IMHC Early Works Construction Traffic Management Plan Prepared by Stantec for: RobertsCo by Stantec, Ref: 301400181, Rev A, 28 August 2023
- Construction Noise and Vibration Management Plan prepared by Acoustic Logic, ref 20230763.1/2408A/R1/RF, Rev 1, 24 August 2023
- Construction Waste Management Plan developed as part of the REF by JBS&G Australia Pty Ltd, 60807/142050, Rev 1, dated 13 October 2022
- Cumberland West Mental Health Services Relocation, Integrated Mental Health Complex Early Works – Construction Soil and Water Management Plan & Construction Flood Emergency Response Sub-Plan prepared by Arup Australia, Reference: CWMH-ARP-CV-RP-PS-9-XX010, Rev B | 15 February 2024
- WHSMP RCo-WHS-PLN-001-WHS MANAGEMENT PLAN, Rev 03, 9 February 2024
- Senversa Interim Audit Advice No. 2 dated 24 February 2024
- Remedial Action Plan (RAP) by JBS&G, Rev 7 - 60807/139612, 25 November 2022
- Design Certificate issued – dated 21 February 2024 by Arup, ref 281916
- AMR138 Airborne Asbestos Fibre Monitoring Report, Westmead IMHC (Rev 0), 9 April 2024, ref JBS&G (65686 –158621)
- AMR142 Airborne Asbestos Fibre Monitoring Report, Westmead IMHC (Rev 0), 15 April 2024, ref BS&G (65686 –158947)
- RConstruct Site Specific Induction
- LHD Disruption Notice meetings every Monday (calendar invite for 20 May 2024)
- Child Care Centre site inspection every Tuesday (calendar invite 21 May 2024)
- CHW Disruption Notice meetings Thursdays (calendar invite 23 May 2024)
- Disruption Notice ref DN-RC052 Watermain Diversion dated 26 April 2024
- Disruption Notice ref LHD – IMHC – DN-RC054 dated 15 May 2024
- Letter dated 29 February 2024 for notification of commencement date as 4 March 2024 from Health Infrastructure (HI) to the Department of Planning, Housing and Infrastructure (DPHI).
- Portal receipt SSD-44035342-PA-2 – notification of commencement, 29 February 2024
- Aconex RobCo-GCOR-000051, 9 August 2023
- Aconex TSA-GCOR-000994, 10 August 2023
- Pre-Construction Dilapidation Report. Existing Condition Land Surveys Indigenous Rev 0, 11 August 2023 Indiya Geospatial
- Aconex from Certifier PCHUN-GCOR-000450, 9 February 2024
- Aconex from Roberts Co RobCo-GCOR-000228, 25 August 2023
- Aconex from TSA to HI, TSA-GCOR-001219, 29 August 2023
- Aconex from HI to TSA, Health-I-GCOR-001494, 13 September 2023
- Aconex RobCo-GCOR-001383 to Certifier, 10 November 2023
- Aconex Roberts Co to TSA – RobCo-GCOR-002513 on 4 March 2024

- Aconex from ARUP requesting Geotech design dated 24 August 2023
- Aconex from JK Geotechnics – sent to OveArup-GCOR-001367 Mail No. JKG-GCOR-000058, 31 October 2023
- Crown Design Verification Certificate, ref 23-220761_IMHC_Early Works_S6.28_CDVC1), 30 August 2023
- 6-7m deep excavation for shoring box – launch pit 7 approval from Coates Hire as per letter dated 14 May 2024, Document No. 2607261-C-LP7
- Pre-start form, on site Plant ID No. 55109E for Supreme Earthmoving Serial No. HCMDA-420E000988853 Plant ZXI35US last service 2023 next service due 650 hrs (90 left). Purpose: for excavation works at BIRS. LSC400 – model No BM400LSC.
- Pre-start form, onsite Plant ID No. 317, Serial No. 503347, Komatsu, Plant Model PC210LC-11 reviewed 28 May 2024, checked by Roberts Co. and signed 3 June 2024.
- Pre-start form, onsite Plant ID No. V-1, Serial No. 70941 for Pezzimenti Tunnelbore Plant Model VAC-1, reviewed 11 April 2024; for pumping out drill waste into container. Signed by Roberts Co. 1 May 2024
- Service Record VAC-1 dated 5 March 2024
- Service Record PP-4, major service undertaken on 27 March 2024
- Plant Register and Maintenance Register by Cherrie Civil
- Acoustic Logic Pathology Building Project ID 20230763.5 dated 22 April 2024 (Rev 0)
- HSE walk RobCo-GCOR-003051, 19 April 2024
- Cherrie Civil email, 20 May 2024
- HI email thread to DPHI, 2 May 2024
- TSA email to Certifier Philip Chun, 22 December 2023
- Email to Redbank House, 8 March 2024
- RConstruct record for Plateau Trees personnel. Certificate sighted: AHC30816 Certificate III in Arboriculture dated 27 April 2018, Certificate No. 000654
- IMHC-ARU-CI-DG-0-0601 Stormwater Management, Rev 02 on 19 February 2024 by Arup Australia
- 004KBT 18 April 2024 – 37.46T for GSW-A – Docket No. EPI100835\1 to Erskine Park.
- BB0063 18 April 2024 – 32.74T for GSW-A – Docket No. EPI100836\1. Approval No. A24047. Bulk Transport Solutions EPL No. 13340.
- Cherrie Civil Material Tracking Register
- DPHI letter dated 21 February 2024, NSW Planning ref: SSD-44034342-PA-1, Westmead Integrated Mental Health Complex- Independent auditor agreement in response to auditing team submission dated 8 February 2024.
- Long Service Levy Receipt No. L0000125606 (For Early Works Only) dated 14 August 2023
- Sydney Water drawings package with stamp 25 January 2024
- SafeWork notification 943R-00386768-01 11 August 2023 for 17 August 2023
- Email from JBS&G, 17 April 2024
- Email from JBS&G, 18 April 2024
- Certificate of Analysis Lab report 1086213-AID, sampled on 10 April 2024, report dated 11 April 2024
- Cumberland West Mental Health Services Relocation, Early Works Milestone 4, Civil Design Certificate, ref IMHC-ARU-CI-DC-00-0002, 15 February 2024
- Hydraulic Design Certificate also presented: IMHC-HPA-HY-DC-0001 dated 23 August 2023 Rev 1, by Harris Page & Associates Pty Limited

6. Audit Findings

6.1 Assessment of Compliance

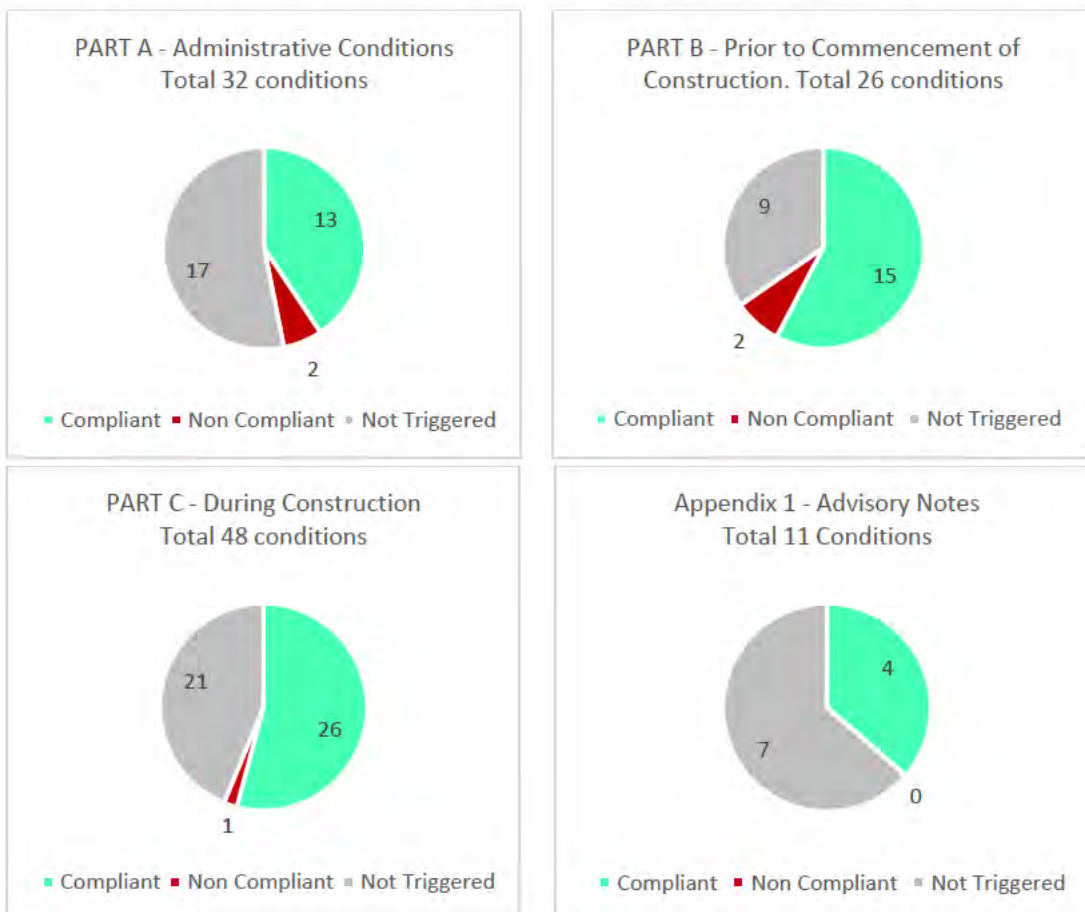
This audit was completed to assess the implementation of the Project Environmental Management Plan and Sub-Plans, as well as environmental controls established by Roberts Co. for the Integrated Mental Health Complex, against Development Consent SSD-44034342, Schedule 2 (121 conditions).

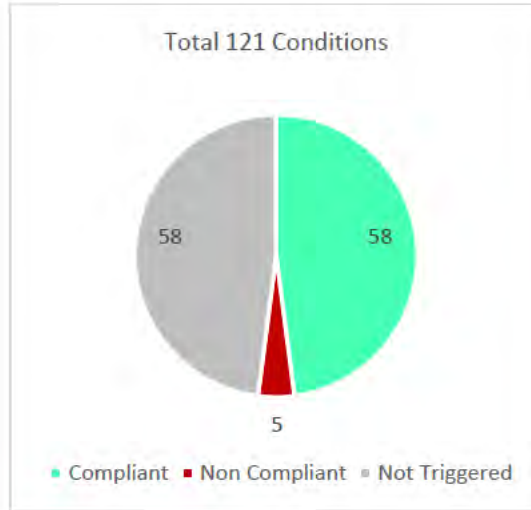
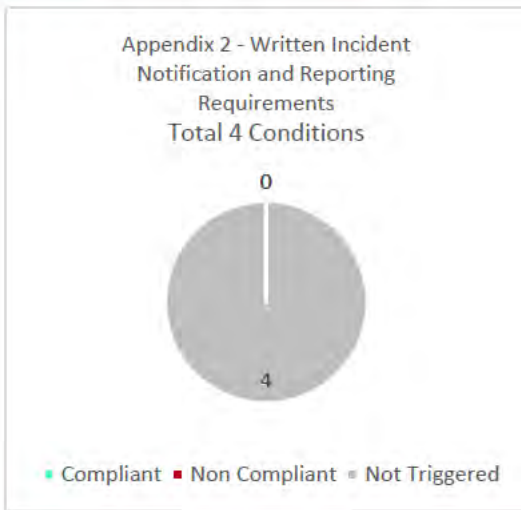
The following table summarises the audit findings by rating category:

Findings Rating	Findings
Compliant	58
Non-Compliant	5
Not Triggered	58
Total	121

Table 5- Summary of Findings

The comparison of audit requirements against the compliance ratings is as follows:





6.2 Notices, Incidents and Complaints

6.2.1 Notices and Incidents

Roberts Co. and TSA confirmed that no agency notices, orders, penalty notices or prosecutions were issued, and no reportable environmental incidents were recorded during the audit period.

6.2.2 Complaints

A Complaints Register is in place where complaints details are recorded, including resolution reached. Three complaints have been received to date, with two applicable under the REF Approval works for Milestones 1 to 3.

One complaint associated with graffiti across from Redbank School occurred under Milestone 4 whereby a worker had painted a profanity then immediately painted over it. A worker toolbox was actioned and the complaint addressed and closed out as evidenced.

At the time of the audit, the complaints register was not made publicly available on the project website as required by Condition A23. Refer to [Section 6.8](#) and Condition A23 under the Audit Checklist ([Appendix E](#)) for details.

6.2.3 Non-Compliances

No non-compliances have been raised on the project since its commencement.

6.3 Previous Audit Findings

This is the first independent environmental audit of the project therefore there are no previous findings to note.

6.4 Audit Site Inspection

A site inspection was conducted of the construction areas with representatives of Roberts Co., Cherrie Civil, TSA, and APP to review the effectiveness of environmental mitigation measures implemented.

Observations of the site walk included:

- ▶ Signage in place with secured shade cloth ATF and hoarding on Redbank Road and Dragonfly Drive. Contains project details and contact numbers.
- ▶ Site has restricted access with traffic controllers present.

- ▶ Tree protection zones appeared undisturbed.
- ▶ Site pre-start board includes location of ACM, air monitors, and VMP.
- ▶ Asbestos areas fenced with black sheeting. Stockpiles covered in geofabric.
- ▶ Exclusion zone clearly demarcated. Workers in area noted to be in full hazmat suits. Decontamination sheds available.
- ▶ Hardstand with rumble grid and hose at site access.
- ▶ Waste bins and spill kits available at point of use.
- ▶ Erosion and sedimentation controls included protection of pit drains and sediment fencing.
- ▶ Sediment basin has been installed and in use, fenced with lifesaver.
- ▶ No evidence of dust or mud tracking onto hospital roads.
- ▶ Borehole construction was underway with workers observed to be in full PPE.
- ▶ Vehicle noted to have non-tonal reversing alarm.

Five observations were raised during the site inspection as follows:

Ref	Observation details
OBS-01	Dedicated signage was not present for stockpiled materials. It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled.
OBS-02	The height of installed airborne asbestos monitors did not appear to be within breathing height range. It is recommended their placement be reviewed with the onsite hygienist.
OBS-03	It was observed that asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary. It is recommended to reconsider the placement of exclusion zone boundaries with the onsite hygienist to ensure adequate distances are maintained.
OBS-04	A truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water. There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / toolbox to be actioned to ensure workers are compliant with this process.
OBS-05	Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorptive surface facing outwards. There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.

Table 4- Site Issues

Further observations included:

- Missing protection of pit drain at Redbank Road – this was rectified immediately.
- Stockpile noted to be quite steep in parts, however this is being progressively reused onsite.
- Air monitoring results displayed onsite were one day old. This was updated during the audit.

Photos of the site inspection are included in [Appendix G](#). Site observations have been added as improvement opportunities to the applicable consent conditions. Refer to [Section 6.8](#) for details.

6.5 Suitability of Plans and the Environmental Management System

Roberts Co. has developed a project specific Environmental Management Plan (EMP) and Sub-Plans for Construction Noise and Vibration Management, Construction Traffic Management, Asbestos Management, Soil and Water, Flooding, and Waste Management.

Updates to the existing Project Environmental Management Plan as developed for the earlier works under Package 4 (Milestones 1 to 3 being delivered as per Review of Environmental Factors approval) were actioned to align with the requirements of the State Significant Development (SSD) Consent Conditions issued for the Milestone 4 works. Retained consolidation of the plan was deemed practical given the Review of Environmental Factors (REF) and SSD milestones fall under the Early Works component of the project and are both being delivered by Roberts Co. A separate Construction Soil and Water Management Plan & Construction Flood Emergency Response Sub-Plan was developed by Arup during the audit period to address SSD requirements and has been implemented for all early works.

Roberts Co.'s Environmental Management System was verified during the review of documentation, records and conduct of a site inspection. Implementation of the Asbestos Management Plan in accordance with the Remedial Action Plan (RAP) was demonstrated through daily monitoring of the site by JBS&G, clearance certificates during the audit period, and the activities occurring onsite as reviewed during the audit, however a non-compliance was raised with regards to the material tracking plan and data requirements as detailed within Section 9.6 of the RAP. The outcome of the audit also identified observations which were in turn raised as improvement opportunities as relevant to the implementation of the RAP – refer to [Section 6.4](#) (Site Inspection), [Section 6.8](#) (Audit Findings), and [Appendix E](#) (Audit Checklist), for further details.

Based on the outcome of the audit, the project's Environmental Management System documentation was found to be generally suitable to the current scope of works with findings to be addressed to demonstrate full compliance with the RAP.

6.6 Actual vs Predicated Impacts

The Environmental Impact Statement (EIS) as prepared by Ethos Urban, 6 May 2023 (2210234) details the mitigation measures under Appendix B. Ethos Urban also prepared the Submissions Report dated 29 August 2023, including Updated Mitigation Measures as per Appendix B. In accordance with the IAPAR 2020 guidelines, the Lead Auditor has assessed the actual environmental impacts against the predicted impacts as per the EIS. Given the scale of technical studies that supported the preparation of the EIS, it is not possible to determine full compliance to such predictions during this audit, rather the Lead Auditor has adopted a qualitative approach to the comparison.

6.6.1 Built Form and Design

The Integrated Mental Health Complex will be located within the central portion of the hospital campus with the aim of achieving urban design within the context of the site. However, built form is not applicable to the early works component of the project and will be triggered under the Main Works stage.

6.6.2 Traffic, Access and Parking

It expected that heavy vehicles will access the site from Dragonfly Drive via Mons Road as per the construction traffic and parking section (6.5.8) of the EIS. The Construction Traffic and Parking Management Plan as developed by Stantec applies to the earlier Milestones (1 to 3) and SSD Milestone 4. The plan was verified during the audit and secured heavy vehicle access was noted during the site inspection. The allocated parking

area was also observed at Mons Road which is communicated through the site induction as presented. No mud tracking was observed at the time of the audit. Traffic controllers were also present with restricted access to the site and directional signage installed.

6.6.3 Noise and Vibration

Section 6.6 of the EIS details construction noise and vibration impacts which would be mitigated by the implementation of measures outlined in Appendix B of the EIS. Acoustic Logic have developed a Construction Noise and Vibration Management Plan. The project is adhering to the standard construction hours with no out of hours works occurring during the audit period. A Disruption Notice process is in place to communicate the works as they progress to the Local Health District and Sydney Children's Hospital Network, with regular consultation occurring with the Child Care Centre, Redbank House, and CareFlight as presented during the audit. No piling or high-vibratory activities had commenced during the audit period. No complaints have been received and it is acknowledged that noise and vibration monitoring is occurring under the REF Approval for the concurrent Milestone 2 works being carried out. One vibration exceedance occurred however this was investigated and confirmed that it was likely due to the equipment being bumped as no activities were being undertaken at the time of the exceedance. There have been no noise exceedances. Non-tonal reversing alarms were observed on plant during the site inspection and hoarding in place, with one improvement opportunity raised applicable to the placement of the noise blankets.

6.6.4 Flooding

ARUP undertook the assessment of the flood impacts as per Section 6.20 of the EIS and Appendix Y, confirming that there will be minimal change to the existing flood conditions as a result of the IMHC development. ARUP was engaged to prepare the Construction Soil and Water & Construction Flood Emergency Response Sub-Plan for the early works phase of the project, detailing the flood mitigation under Section 4.3 which includes 1 in 5-year ARI and 1 in 100-year ARI. Roberts Co. have also developed a WHS Management Plan including a flood evacuation procedure during construction. In addition to this, ARUP prepared the Stormwater Management System as verified during the audit. Remaining requirements (maintenance of stormwater system, implementation of design, operational requirements, etc.) will fall under the Main Works stage.

6.6.5 Contamination/Remediation

A Remedial Action Plan (RAP) has been developed by JSB&G as per EIS Appendix I, Revision 7, November 2022, which is to be implemented during construction as per Section 6.8 of the EIS. At the time of the audit, capping of the contaminated material had not yet occurred. Based on the evidence presented, asbestos material was removed off-site, tracked and classified as General Solid Waste – Asbestos (GSW-A) and disposed at an EPA licenced facility which was deemed a suitable option within the EIS. JBS&G are engaged as the onsite hygienist undertaking daily air quality monitoring with Senversa appointed as the NSW EPA-accredited Site Auditor. During the audit, site observations and findings were raised upon review of the RAP requirements – refer to [Section 6.8](#) and [Appendix E](#) for details. Site inspection photos have also been included under [Appendix G](#).

6.6.6 Tree Management and Biodiversity

As noted within the EIS Section 6.15 and mitigation measures under Appendix B, pre-clearing was actioned by an AQF3 arborist, Plateau Trees, as verified during the audit; retained trees onsite were observed to be protected with fencing and signage in place. No access to tree protection zones has been required to date.

As per Section 6.16 of the EIS, a Biodiversity Development Assessment Report (BDAR) was not required. It is noted, however that an ecologist has been engaged for the project.

6.6.7 Heritage, Aboriginal Heritage and Archaeology

During excavation, Comber Consultants have attended site to monitor for presence of the 1902 tramline. No evidence of the tramline has been uncovered to date with Comber still to provide the report from the May 2024 inspection. No unexpected finds have occurred. Section 6.11 of the EIS stated that the site has been assessed as having low historical archaeological potential. Comber Consultants also determined that the proposed development is not expected to have any impact on Aboriginal objects as per Section 6.12 of the EIS.

Unexpected finds procedures have been included within the Project EMP Appendix 04 to address Sections 6.11 and 6.12 of the EIS and are also part of the project induction as presented during the audit.

6.6.8 Other impacts

Geotechnical and piling recommendations as per JK Geotechnics are implemented on the project as evidenced by Coates Hire approval of launch pits.

Waste is being managed onsite as per implementation of the Project EMP by maintaining the material waste tracking register which records classification of the material as aligned to the RAP, disposal location, and tonnage, however a non-compliance was identified in accordance with Section 9.6 of the RAP, material tracking plan and data requirements.

Erosion and sedimentation controls were observed onsite as per EIS Section 6.19 including sediment fencing, protection of pit drains, sediment basin, and the management of stockpiles. Some observations were raised during the site inspection regarding stockpile height and protection of pit drains (refer to photos included under [Appendix G](#)).

Social Impact as per EIS Section 6.21 and Appendix Z was reviewed during the audit, the main construction impact being the affect on community which appeared adequately addressed via the Disruption Notice process.

As part of the audit, the BCA Crown Design Verification Certificate #2, as applicable to Milestone 4, was reviewed as per EIS Section 6.22.

Environmental Amenity including Light spill, Connection to Country, Crime Prevention through Design, Environmentally Sustainable Development, Aviation, and Disability Access measures are not applicable to early works and will be triggered under Main Works.

6.6.9 Summary

Based on the assessment contained in [Section 6.6](#) above, it is the Lead Auditor's opinion that the project's environmental impacts are generally consistent with the EIS and RtS predictions. It is also noted that at the time of the audit, the project Environmental Management Plan and Sub-Plans appeared to address the environmental mitigation measures of the EIS and consent conditions.

6.7 Key Strengths

The outcome of the audit demonstrated that Roberts Co. have implemented good controls to address environmental impacts. The following key strengths were noted:

- ▶ Disruption Notice process appeared well implemented and efficiently managed by both Roberts Co. and TSA.
- ▶ Use of RConstruct platform for close out of actions, induction records and general records keeping was to a high standard.
- ▶ Good management of friable asbestos removal was observed onsite under a 'bubble' enclosure to contain potentially airborne material and segregate from non-friable areas.
- ▶ Site secured with hoarding in place to reduce visual impact within hospital grounds.
- ▶ Effective internal communication through the Site Notice Board onsite.
- ▶ Adopting launch pits and horizontal drilling methods for services installation resulted in considerably less impact to the upper fill layers which are contaminated with asbestos, thereby significantly reducing risks associated with handling and disturbing contaminated material.

6.8 Audit Findings and Recommendations

Implementation of Roberts Co. Project Environmental Management Plan and Sub-Plans were verified to be generally in compliance with Development Consent SSD-44034342. Refer to the attached [Appendix E](#) for full details of the completed audit checklist. Five (5) non-compliances and five (5) opportunities for improvement were identified during the audit. Findings raised are as summarised overpage.

Ref	Finding	Condition of Consent	Audit Finding
Non-Compliances			
IMHC-SSD-01-NC-01	Non-Compliant	<p>A2: Terms of Consent The development may only be carried out:</p> <ul style="list-style-type: none"> a. in compliance with the conditions of this consent 	<p>Based on the non-compliances identified during the audit, this triggers a non-compliance against Condition A2(a). Close out of the identified non-compliances will automatically address this finding.</p>
IMHC-SSD-01-NC-02	Non-Compliant	<p>A23: Access to Information At least 48 hours before the commencement of construction or such other time as agreed by the Planning Secretary, the Applicant must:</p> <ul style="list-style-type: none"> a. make the following information and documents (as they are obtained or approved) publicly available on its website: (i) to (x), and 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>At the time of the audit, not all information/documentation was uploaded as required by Condition A23. This triggers a non-compliance against Condition A23.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23.</p>
IMHC-SSD-01-NC-03	Non-Compliant	<p>B12: Construction Environmental Management Plan 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 A23.</p>	<p>The Project EMP had not been uploaded on the project website as required by Condition B12.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B12.</p>
IMHC-SSD-01-NC-04	Non-Compliant	<p>B20: Construction Parking Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be published on the Applicant's website in accordance with condition A34. This condition cannot be staged.</p>	<p>The Construction Management Plan, which includes the Construction Worker Transportation Strategy was not included on the project website which is a requirement of Condition B20.</p> <p>It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B20.</p>
IMHC-SSD-01-NC-05	Non-Compliant	<p>C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.</p>	<p>The Material Tracking Register presented did not fully address all the requirements as per RAP Section 9.6.</p> <p>It is recommended to further develop the existing material register to fully meet the requirements of the RAP.</p>

Ref	Finding	Condition of Consent	Audit Finding
Opportunities for Improvement			
IMHC-SSD-01-OFI-01	Opportunities for Improvement	C10: Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	During the site inspection, a truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water. There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / too box to be actioned to ensure workers are compliant with this process.
IMHC-SSD-01-OFI-02	Opportunities for Improvement	C14: Construction Noise Limits The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (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.	Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorbative surface facing outwards. There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.
IMHC-SSD-01-OFI-03	Opportunities for Improvement	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	During the site inspection, dedicated signage was not present for stockpiled materials. It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled.
IMHC-SSD-01-OFI-04	Opportunities for Improvement	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	The height of installed airborne asbestos monitors did not appear to be within breathing height range. It is recommended their placement be reviewed with the onsite hygienist.
IMHC-SSD-01-OFI-05	Opportunities for Improvement	C38: Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	During the site inspection it was observed that asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary. It is recommended to reconsider the placement of exclusion zone boundaries with the onsite hygienist to ensure adequate distances are maintained.

Table 6- Findings

Appendix A- Audit Agenda



IMHC-SSD-01

Audit Agenda – Westmead Integrated Mental Health Complex – IMHC

Project	Independent Environmental Audit – Westmead Integrated Mental Health Complex – IMHC	
Proponent	Health Infrastructure	
Project Manager	TSA Management	
Contractor	Roberts Co.	
Location	Roberts Co. Site Office	
Date and Time	Day One: Wednesday, 22 May 2024	9:30 AM – 10:30 AM
	Day Two: Thursday, 23 May 2024	9:30 AM – 3:30 PM
Auditing Team	Barbara Pater, Lead Auditor (Day one & two) Dylan Jones, Subject Matter Expert (Day two only)	
Site contact	Dimitra Rousounidou, Project Manager, TSA Management 0426 282 201	
Audit criteria	SSD-44034342 (Milestone 4), and in accordance with the <i>Independent Audit Post Approval Requirements (IAPAR 2020)</i>	
Audit scope	Within 12 week of commencement of construction audit	

Agenda – Day One

Day one (22 May 2024)	Time
Opening Meeting <ul style="list-style-type: none"> ▶ Confirm scope of the audit, outline the audit process, methodology, timing, access, and resources required. 	9:30 AM – 9:45 AM
Review of: SSD-44034342 Schedule 2*	
<ul style="list-style-type: none"> ▶ PART A: Administrative Conditions 	10:00 AM – 11:00 AM
<ul style="list-style-type: none"> ▶ PART B: Prior to Commencement of Construction 	11:00 AM – 1:00 PM

Day one (22 May 2024)	Time
Lunch break	1:00 PM – 1:45 PM
▶ PART C: During Construction	1:45 PM – 2:45 PM
▶ Advisory Notes	2:45 PM – 3:00 PM
Auditor consolidation (auditor only) / Afternoon tea break	3:00 PM – 3:15 PM
Debrief of Day One	
▶ Status of audit findings.	
▶ <i>*Note: Day one will exclude the site inspection and a review of records including site contamination, asbestos, remediation, waste, and associated impacts. These will be reviewed as part of Day two.</i>	3:15 PM – 3:30 PM

Agenda – Day Two

Day two (23 May 2024)	Time
Site Walk	
▶ Undertake site induction. Sight current site activities and provide focus for the review of environmental aspects, impacts, controls, and relevant records.	9:30 AM – 10:45 AM
Site Inspection Debrief	10:45 AM – 11:00 AM
▶ Waste Storage & Processing (C34) ▶ Site Contamination (C35, C36, C37) ▶ Handling of Asbestos (Advisory Note) AN10	11:00 AM – 1:00 PM
Lunch break	1:00 PM – 1:45 PM
▶ Site Contamination (C38, C40) ▶ Imported Fill (C23) ▶ Site Contamination (C39)	1:45 PM – 3:00 PM
Auditor consolidation (auditor only) / Afternoon tea break	3:00 PM – 3:15 PM

Day two (23 May 2024)	Time
Closing meeting <ul style="list-style-type: none"> ▶ Outcome of audit and presentation of findings. Deliverables as noted below. 	3:15 PM – 3:30 PM

Deliverables

Audit Deliverables	Responsibility
Draft Report Submission <ul style="list-style-type: none"> ▶ 21 days following conduct of independent audit 	APP
Response to draft report <ul style="list-style-type: none"> ▶ 14 days following receipt of draft audit report from APP 	HI / TSA Management
Final report submission <ul style="list-style-type: none"> ▶ Finalised within 7 days following receipt of comments from HI/TSA ▶ Submitted to HI/TSA 	APP
Response to findings and submission of final audit report <ul style="list-style-type: none"> ▶ Final audit report submitted to the Department of Planning, Housing and Infrastructure (DPHI) as per Consent Conditions C44 & C45. 	HI / TSA Management
Non-Compliances (if applicable) <ul style="list-style-type: none"> ▶ HI / TSA is to follow the process to notify DPHI regarding any non-compliances raised during the audit. Refer to Consent Conditions A27 & A28 for details. 	HI / TSA Management

Limitations

- A. The audit will cover the construction requirements only and will therefore be limited to auditing the applicable conditions in accordance with Consent Conditions SSD-44034342, Schedule 2 Parts A, B, C and Appendices.
- B. The audit will cover a sampling of records relevant to the scope. APP auditors will apply their professional judgment based on the information made available during the audit.
- C. APP will conduct the audit in accordance with the *Independent Auditing Post Approval Requirements* (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise Opportunities for Improvement.

Appendix B- Audit Attendance Sheet

Audit Attendance Sheet

Project	IMHC - EARLY WORKS	Audit No.	# 1A075-02
Auditee	Roberts Co./TSA/HI	Lead Auditor	Barbara Pater
Location	Roberts Co. Site Office, Westmead.		
Opening Meeting Date	22 May 2024, 9:30 AM		
Closing Meeting Date	23 May 2024, 2:20 PM		

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
[REDACTED]	APP	L. Auditor	[REDACTED]	[REDACTED]
[REDACTED]	TSA	P.M	[REDACTED]	[REDACTED]
[REDACTED]	RCO	Cadet	[REDACTED]	[REDACTED]
[REDACTED]	RCG	P.E	[REDACTED]	[REDACTED]
[REDACTED]	RCO	P.M	[REDACTED]	[REDACTED]
[REDACTED]	HI	P.D	[REDACTED]	[REDACTED]

Appendix C – Approval of Auditors

NSW Planning ref: SSD-44034342-PA-1

Kathryn Saunders
Senior Advisor, Town Planning (Post Approval and Compliance)
Health Infrastructure
1 Reserve Road
St Leonards NSW 2065

21 February 2024

Sent via the Major Projects Portal only

Subject: Westmead Integrated Mental Health Complex- Independent auditor agreement

Dear Ms Saunders

Reference is made to your post approval request, SSD-44034342-PA-1, for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct an Independent Audit of the Westmead Integrated Mental Health Complex, submitted as required by Condition C42 of SSD 44034342 (the "Consent") to the NSW Department of Planning, Housing and Infrastructure ("NSW Planning") on 8 February 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided and in this instance is satisfied that Ms Barbara Pater is suitably qualified, experienced, and independent.

In accordance with Condition C42 of the Consent and the *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I agree to the following independent lead auditor:

- Ms Barbara Pater (of the APP Group).

It is noted that Ms Pater's Exemplar Global certification as a Lead Environmental Management Systems Auditor is about to expire on 21 June 2024. Please note that agreement is conditional upon Ms Pater maintaining her current Exemplar Global certification.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the endorsement of the above independent auditor for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Alfarid Hussain via email at compliance@planning.nsw.gov.au.

Yours sincerely,



Rob Sherry
Team Leader Compliance- Government Projects
As nominee of the Planning Secretary

Appendix D – Independent Audit Declarations

Declaration of Independence Form

Independent Audit Declaration Form	
Project Name:	Integrated Mental Health Complex (IMHC)
Consent Number:	SSD-24452965
Description of Project:	Package 4 – IMHC Early Works, which involves the demolition of existing buildings (Casuarina Lodge, BIRS, existing Westmead Redevelopment Project Office, and other ancillary Buildings), new P14 Car Park Access, service diversions, and bulk excavation and piling.
Project Address:	Redbank Road, Westmead NSW
Proponent:	Health Infrastructure
Title of Audit:	Independent Environmental Audit
Date:	6 June 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my 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 an approved project must not fail to include information in (or provide information for inclusion 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 materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; 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 the Auditor:	Barbara Pater
Signature:	
Qualification:	Lead Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

Declaration of Independence Form

Independent Audit Declaration Form	
Project Name:	Integrated Mental Health Complex (IMHC)
Consent Number:	SSD-24452965
Description of Project:	Package 4 – IMHC Early Works, which involves the demolition of existing buildings (Casuarina Lodge, BIRS, existing Westmead Redevelopment Project Office, and other ancillary Buildings), new P14 Car Park Access, service diversions, and bulk excavation and piling.
Project Address:	Redbank Road, Westmead NSW
Proponent:	Health Infrastructure
Title of Audit:	Independent Environmental Audit
Date:	6 June 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my 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 an approved project must not fail to include information in (or provide information for inclusion 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 materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; 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 the Auditor:	Dylan Jones
Signature:	
Qualification:	Senior Environmental Consultant & Technical Reviewer
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

Appendix E – Audit Checklist

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating																																																																																																
1.	A	PART A – ADMINISTRATIVE CONDITIONS																																																																																																			
1.1.	A1	<p>Obligation to Minimise Harm to the environment</p> <p>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.</p>	Reasonable and feasible measures were implemented to prevent environmental impacts during the execution of the early works including tree removal, asbestos management, and erosion and sediment controls.	Note: Observations were identified on site during the verification of the Remedial Action Plan implementation. Refer to Condition C38 for details.	Compliant																																																																																																
1.2.	A2	<p>Terms of Consent</p> <p>The development may only be carried out:</p> <ol style="list-style-type: none"> in compliance with the conditions of this consent; in accordance with all written directions of the Planning Secretary; generally in accordance with the EIS and Response to Submissions; and in accordance with the approved plans in the table below: <table border="1" data-bbox="280 678 952 1252"> <thead> <tr> <th colspan="4">Architectural Plans prepared by Jacobs</th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>IMHC-AR-DG-0161</td><td>5</td><td>PRE-DEVELOPMENT SITE PLAN - SSSA</td><td>06/04/23</td></tr> <tr><td>IMHC-AR-DG-0120</td><td>13</td><td>SITE PLAN - PROPOSED</td><td>06/04/23</td></tr> <tr><td>IMHC-AR-DG-1600</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 0</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1601</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 1</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1602</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 2</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1603</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 3</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1604</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 4</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1605</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 5</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1606</td><td>5</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 6</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1607</td><td>5</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 7</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1608</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 8</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1609</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 9</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1610</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - LEVEL 10</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-1611</td><td>4</td><td>PROPOSED FLOOR PLAN - SSSA - ROOF</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4001</td><td>11</td><td>ELEVATION - NORTH & SOUTH</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4002</td><td>11</td><td>ELEVATION - EAST & WEST</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4010</td><td>10</td><td>ELEVATION - B1-B5</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4100</td><td>10</td><td>SECTION - NORTH SOUTH</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4101</td><td>10</td><td>SECTION - CASB LINK</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4102</td><td>8</td><td>SECTION - NORTHERN COURTYARDS</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-4103</td><td>11</td><td>SECTION - ENTRY & CORRIDOR</td><td>23/11/22</td></tr> <tr><td>IMHC-AR-DG-7910</td><td>4</td><td>MATERIAL BOARD - FACADE</td><td>23/11/22</td></tr> </tbody> </table>	Architectural Plans prepared by Jacobs				Dwg No.	Rev	Name of Plan	Date	IMHC-AR-DG-0161	5	PRE-DEVELOPMENT SITE PLAN - SSSA	06/04/23	IMHC-AR-DG-0120	13	SITE PLAN - PROPOSED	06/04/23	IMHC-AR-DG-1600	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 0	23/11/22	IMHC-AR-DG-1601	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 1	23/11/22	IMHC-AR-DG-1602	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 2	23/11/22	IMHC-AR-DG-1603	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 3	23/11/22	IMHC-AR-DG-1604	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 4	23/11/22	IMHC-AR-DG-1605	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 5	23/11/22	IMHC-AR-DG-1606	5	PROPOSED FLOOR PLAN - SSSA - LEVEL 6	23/11/22	IMHC-AR-DG-1607	5	PROPOSED FLOOR PLAN - SSSA - LEVEL 7	23/11/22	IMHC-AR-DG-1608	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 8	23/11/22	IMHC-AR-DG-1609	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 9	23/11/22	IMHC-AR-DG-1610	4	PROPOSED FLOOR PLAN - SSSA - LEVEL 10	23/11/22	IMHC-AR-DG-1611	4	PROPOSED FLOOR PLAN - SSSA - ROOF	23/11/22	IMHC-AR-DG-4001	11	ELEVATION - NORTH & SOUTH	23/11/22	IMHC-AR-DG-4002	11	ELEVATION - EAST & WEST	23/11/22	IMHC-AR-DG-4010	10	ELEVATION - B1-B5	23/11/22	IMHC-AR-DG-4100	10	SECTION - NORTH SOUTH	23/11/22	IMHC-AR-DG-4101	10	SECTION - CASB LINK	23/11/22	IMHC-AR-DG-4102	8	SECTION - NORTHERN COURTYARDS	23/11/22	IMHC-AR-DG-4103	11	SECTION - ENTRY & CORRIDOR	23/11/22	IMHC-AR-DG-7910	4	MATERIAL BOARD - FACADE	23/11/22	<ol style="list-style-type: none"> Non-Compliances have been identified against various consent conditions triggering a non-compliance against A2(a). DPHI visited site and advised clean-up of sediment build up which was addressed and closed. Refer to Condition A3 for details. Based on the evidence presented, the development is being carried out generally in accordance with the EIS as prepared by Ethos Urban 18 April 2023 + RtS and IMHC Submissions Report prepared by Ethos Urbis dated 29 August 2023. Refer to Section 6.6 of the audit report. Approved plans are stored on Aconex where applicable (it is noted that a majority of drawings listed in the SSD are relevant to Main Works). <p>Status of Milestone 4:</p> <ul style="list-style-type: none"> Bulk earthworks have commenced. Piling – upcoming end of May 2024 Retention structures – upcoming, towards the end of works. HV conduit installation – upcoming Diesel tank installation – upcoming Trenching for inground hydraulic services – has commenced. Stormwater works – commenced. Bioretention basin – one basin to be constructed, upcoming. Tree removal – all complete, actioned during the audit period. 	<p>Non-Compliant</p> <p>IMHC-SSD-01_NC-01:</p> <p>Non-Compliances have been identified against various consent conditions triggering a non-compliance against A2(a).</p> <p>Close out of the identified non-compliances will automatically address this finding.</p>	Non-Compliant
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1.3.	A3	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:</p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> No written directions regarding plans or programs. No reports required during the audit period. DPHI Compliance team visited site following rain event. Sediment build-up was observed in some areas; DPHI advised clean up to occur, close out photos provided as per email evidence – HI email to DPHI on 2 May 2024 with photos attached showing controls around live drainage, DPHI responded the same day noting the prompt action 		Compliant																																																																								
1.4.	A4	<p>The conditions of this consent and written directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and any 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.</p>	No inconsistencies.		Not Triggered																																																																								
1.5.	A5	<p>Limits of Consent This consent lapses five years after the date of consent unless work is physically commenced.</p>	Approval has not yet lapsed; works have physically commenced.		Not Triggered																																																																								

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1.6.	A6	Prescribed Conditions The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation.	Prescribed conditions as per BCA Crown Design Verification Certificate # 2 for Milestone 4: CDVC#2 issued by Philip Chun Certifier on 21 February 2024.		Not Triggered
1.7.	A7	Planning Secretary as Moderator 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.	No disputes with Council or any other public authority.		Not Triggered
1.8.	A8	Evidence of Consultation Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	No consultation requirements have been triggered for Milestone 4. This will be triggered under Main Works.		Not Triggered
1.9.	A9	Staging 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 Certifier for approval. The Staging Report must be submitted to the Certifier no later than 14 days before the commencement of construction of the first of the proposed stages of construction.	Staging Plan developed by TSA Management, V0.3 dated February 2024. Submission to Certifier Philip Chun occurred 22 December 2023 – sent via email (original version) followed by Aconex as presented; from Certifier PCHUN-GCOR-000450 on 9 February 2024 confirming Staging Report received. Commencement of Milestone 4 notified as the 4 March 2024. Issued to Certifier well within the 14-day timeframe.		Compliant
1.10.	A10	A Staging Report prepared in accordance with condition A9 must: <ul style="list-style-type: none"> 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; c. set out mechanisms for managing any cumulative impacts arising from the proposed staging. 	Staging Plan as developed by TSA Management, V0.3 dated February 2024 includes the following: <ul style="list-style-type: none"> a. Section 3.1 Construction Staging b. Appendix A – Staging Matrix c. Section 4 Managing Compliance & Potential Impacts, specifically Section 4.5 Cumulative Impact 		Compliant

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1.11.	A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Certifier.	<p>Currently early works as per Milestone 4:</p> <ul style="list-style-type: none"> • Bulk earthworks have commenced. • Piling – upcoming end of May 2024 • Retention structures – upcoming, towards the end of works. • HV conduit installation – upcoming • Diesel tank installation – upcoming • Trenching for inground hydraulic services – has commenced. • Stormwater works – commenced. • Bioretention basin – one basin to be constructed, upcoming. • Tree removal – all complete, actioned during the audit period. 		Compliant
1.12.	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.	Milestone 4 is progressing as per Staging Report.		Compliant
1.13.	A13	<p>Staging, Combining and Updating Strategies, Plans or Programs The Applicant may:</p> <ol style="list-style-type: none"> 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); 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 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 	<p>Only the staging report applies to the preparation and submission of a staged document as evidenced under Conditions A9-A12.</p> <p>For (b) & (c): The Project EMP and associated Sub-Plans have been combined with those works associated under the REF Approval 10/2023 for Milestones 1 to 3, to encompass Milestone 4 works and address the SSD requirements.</p>		Compliant

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		and incorporate additional measures or amendments to improve the environmental performance of the development).			
1.14.	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.	No strategies, plans or programs requiring submission to DPHI.		Not Triggered
1.15.	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.	No requests received from DPHI.		Not Triggered
1.16.	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.	Current Project EMP and Sub-Plans are being implemented as verified during the audit. Refer to Condition C10 including recommendation. Aconex stores current plans including drawings, etc. Hard copies also kept onsite.		Compliant
1.17.	A17	<p>Structural Adequacy 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.</p> <p><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></p>	<p>Structural certificate received for Milestone 4.</p> <p>Design Certificate issued – dated 21 February 2024 by Arup, ref 281916. Notes compliance with Condition A17 and B21(b).</p> <p>Part of CDVC#2, 21 February 2024, Item 6: Structural Design Certificate, with note from Certifier: "this is also to satisfy SSD Conditions A17, B3 and B26".</p>		Compliant
1.18.	A18	<p>External Walls and Cladding The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.</p>	External walls and cladding are applicable to Main Works.		Not Triggered
1.19.	A19	<p>External Materials 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:</p> <ol style="list-style-type: none"> the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials; the quality and durability of any alternative material is the same standard as the approved external building materials; and 	External walls and cladding are not applicable for Milestone 4 works, Main Works only.		Not Triggered

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		c. a copy of the documentation given to the Certifier is provided to the Planning Secretary within seven days after the Certifier accepts it, if requested.			
1.20.	A20	Applicability of Guidelines 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.	Applicability of guidelines are listed within the Project EMP Appendix 03 – Legal and Other Requirements e.g., Environmental Planning and Assessment Act 1979, Contaminated Land Management Act 1997, Dangerous Goods Safety Management Regulation 2001, etc.		Compliant
1.21.	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.	No requests received from DPHI for monitoring or management obligations.		Not Triggered
1.22.	A22	Monitoring and Environmental Audits 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&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&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>	This is the first independent environmental audit carried out under Milestone 4 in accordance with the SSD consent conditions and IAPAR 2020. Air monitoring undertaken as per reports for April 2024, e.g., 9 April 2024, ref JBS&G (65686 –158621) AMR138 Airborne Asbestos F bre Monitoring Report, Westmead IMHC (Rev 0), and 15 April 2024, ref BS&G (65686 –158947) AMR142 Airborne Asbestos Fibre Monitoring Report, Westmead IMHC (Rev 0). Weekly updates to LHD & location of air monitors. One exceedance which was investigated – higher dust levels due to materials being placed into bin adjacent to monitor during demolition works.		Compliant
1.23.	A23	Access to Information At least 48 hours before the commencement of construction 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: i. the documents referred to in condition A2 of this consent; ii. all current statutory approvals for the development; iii. all 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	Integrated Mental Health Complex Westmead website has been developed and includes the following as required by A23(a): i. Link to Government website (planning portal) with EIS & Rts + Assessment Report ii. Link to Government website (planning portal) with the determination i.e., SSD-44034342 Instrument of Consent iii. Staging Report available. No other plans (CEMP, Sub-Plans, etc) were included. iv. Not fully addressed. Environmental management plans, etc were not available. Air monitoring results were included.	Non-Compliant IMHC-SSD-01_NC-02: At the time of the audit, not all information/documentation was uploaded as required by Condition A23. This raises a non-compliance. It is recommended to implement a process to ensure documentation is continually uploaded and remains	Non-Compliant

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		<ul style="list-style-type: none"> v. arrangements in any plans or programs approved under the conditions of this consent; 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; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly; 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; x. any other matter required by the Planning Secretary; and 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. 	<ul style="list-style-type: none"> v. Air monitoring results for April 2024 by JBS&G. vi. Link to community information page. vii. Contact details (email, phone numbers) viii. No complaints register available. ix. This is the first independent audit of the project under the SSD. x. Not required. b. At the time of the audit, not all information was uploaded as required by Condition A23. 	<p>current on the project website as required by Condition A23.</p>	
1.24.	A24	<p>Compliance</p> <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>RConstruct induction completed online prior to coming on site.</p> <p>RConstruct Site Specific Induction presented and includes the following:</p> <p>WHS Policy, Environmental Policy, Legal Obligations, Project Specifics – working hours, SSDA details, project team, site access plan – Mons Road holding area for heavy vehicle until radio in, legal register and IMS documents, traffic management – includes route from Mons Road, PPE including work specific PPE for asbestos, emergency evacuation + nurse calls with map – assembly point + first aid, flood specific flowchart, plant, permits (hot works, excavation, etc), deliveries (book within 24hrs in advance), nearest medical + hospital, visitors onsite. Environmental Controls are under Section 04: hazards and controls, dangerous goods (SDS generated by Chemwatch), Hazard Notification, hazard materials – includes asbestos and silica, observations can be made on RConstruct, worker conduct, Consultation, daily pre-starts, toolboxes, daily site update via RConstruct, LHD requirements, helicopters, infection control, Aboriginal Arch sites and Heritage, includes <i>National Parks and Wildlife Act 1975, Heritage Act 1977</i>.</p> <p>Sighted RConstruct worker profile from Cherrie Civil, white card, and licence (drivers) included, induction training 22 April 2024 completed</p>		Compliant

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			date. Cherrie Civil worker High Risk work licence HRW871396 expires 2 September 2025. Average around 25 workers onsite.		
1.25.	A25	Incident Notification, Reporting and Response 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.	No material harm or reportable incidents since Milestone 4 commenced.		Not Triggered
1.26.	A26	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2 .	No material harm or reportable incidents since Milestone 4 commenced.		Not Triggered
1.27.	A27	Non-Compliance Notification 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.	No non-compliances issued for Milestone 4 works.		Not Triggered
1.28.	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 by the Applicant to address the non-compliance.	No non-compliances issued for Milestone 4 works.		Not Triggered
1.29.	A29	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	No non-compliances or incidents issued for Milestone 4 works.		Not Triggered
1.30.	A30	Revision of Strategies, Plans and Programs Within three months of: <ul style="list-style-type: none"> a. the submission of an incident report under condition A26; b. the submission of an Independent Audit under condition C41 or C43; 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.	No reviews of plans since commencement of Milestone 4. This is not yet triggered.		Not Triggered
1.31.	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 (where previously approved by the Certifier). Where revisions	This was not triggered during the audit period.		Not Triggered

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		are required, the revised document must be submitted to the Planning Secretary or Certifier (where relevant) 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>			
1.32.	A32	Social Impact Mitigation The recommended mitigation measures outlined in Sections 8 and 9 of the Social Impact Assessment prepared by Ethos Urban dated 17 August 2023 are to be implemented for the life of the project.	The Social Impact Assessment was presented during the audit and describes impacts during construction to the community. Disruption Notice process is implemented to manage impact to community including the Local Health District (LHD), Sydney Children's Hospital Network (SCHN), nearby Child Care Centre, Redbank House and CareFlight. Weekly meetings occur as follows: <ul style="list-style-type: none"> LHD Disruption Notice meetings every Monday (sighted calendar invite for 20 May 2024) Child Care Centre site inspection every Tuesday (sighted calendar invite 21 May 2024) CHW Disruption Notice meetings Thursdays (sighted calendar invite 23 May 2024). Disruption Notices presented: <ul style="list-style-type: none"> ref DN-RC052 Watermain Diversion dated 26 April 2024 for works to commence 11 May 2024 to 30 June 2024 (P14 car park works under the REF approval for Milestone 2) ref LHD – IMHC – DN-RC054 dated 15 May 2024 for piling rigs for Milestone 4. 		Compliant
2.	B	PART B – PRIOR TO COMMENCEMENT OF CONSTRUCTION			
2.1.	B1	Notification of Commencement The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	Letter dated 29 February 2024 for notification of commencement date as 4 March 2024 from Health Infrastructure (HI) to the Department of Planning, Housing and Infrastructure (DPHI). Portal receipt SSD-44035342-PA-2 – notification of commencement, 29 February 2024		Compliant
2.2.	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.	Letter dated 29 February 2024 for notification of commencement date as 4 March 2024 from HI to DPHI. 29 February 2024 SSD-44035342-PA-2 – notification of commencement. Mentions Stage – Early Works (Milestone 4)		Compliant

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2.3.	B3	<p>Certified Drawings</p> <p>Prior to the commencement of the relevant construction stage, the Applicant must submit to the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.</p>	As per CDVC#2, Structural Drawings listed by Arup Australia Pty Ltd, 31 January 2024 e.g., IMHC-ARU-ST-DG-01-0001/05, IMHC-ARU-ST-DG-10-0001/04, IMHC-ARU-ST-DG-10-0010/05. 20 drawings listed in total. Structural Design Certificate also issued by Arup, 21 February 2024 (included as CDVC#2 Item 6).		Compliant
2.4.	B4	<p>External Walls and Cladding</p> <p>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.</p>	External walls and cladding are not applicable to Milestone 4. This will be triggered under Main Works.		Not Triggered
2.5.	B5	<p>Pre-Construction Dilapidation Report – Protection of Public Infrastructure</p> <p>Prior to the commencement of any construction, the Applicant must:</p> <ol style="list-style-type: none"> 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; prepare a Pre-Construction Dilapidation Report identifying the condition of all public (nonresidential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary with 48 hours when requested. 	<ol style="list-style-type: none"> Email to TSA RobCo-GCOR-000051 on 9 August 2023 issuing the dilapidation reports to HI and TSA. TSA responded that to confirming that LHD and Childcare has been notified, ref TSA-GCOR-000994 on 10 August 2023 – request to action prior to 9am while children are indoors Pre-Construction Dilapidation Report. Existing Condition Land Surveys Indigenous Rev 0, 11 August 2023 Indiya Geospatial. LS-007-644 (Pathology, 11 August 2023) and LS-007-637 (Care Flight Access Road, 11 August 2023). Reports covered roads and building facades for Child Care, Care Flight, Redbank Road, Care Flight Road, P14 Carpark, Vivirium and HealthShare, Dragonfly Drive, Redbank House Issued 25 August 2023 from Roberts Co as per RobCo-GCOR-000228 with 10 attached reports. TSA-GCOR-001219 dated 29 August 2023 from TSA to HI. HI responded to confirm they will provide to LHD and Childcare on 13 September 2023 Health-I-GCOR-001494. No requirement to issue to Council as not on Council land. Issued to the Certifier as part of the REF stage – Crown Design Verification Certificate, ref 23-220761_IMHC_Early Works_S6.28_CDVC1), 30 August 2023 No requests from DPHI. 		Compliant
2.6.	B6	<p>Ecologically Sustainable Development</p> <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</p>	Ecologically Sustainable Development will be triggered under Main Works.		Not Triggered

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		prepared by Steensen Varming and dated 24 November 2022, have been incorporated into the design of the development.			
2.7.	B7	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 60 points in accordance with the ESD Evaluation Tool.	Ecologically Sustainable Development will be triggered under Main Works.		Not Triggered
2.8.	B8	Outdoor Lighting Prior to commencement of lighting installation, evidence must be submitted to 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 lighting.	Outdoor lighting is associated with Main Works only.		Not Triggered
2.9.	B9	Demolition Prior to the commencement of construction, if demolition is proposed, demolition work plans required by AS 2601-2001 <i>The demolition of structures</i> (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.	No demolition work associated with Milestone 4. All demolition occurred under Milestone 3 under the REF approval.		Not Triggered
2.10.	B10	Existing Helipad / Helicopter Operations During Construction Prior to the commencement of above ground (main works) construction, the Applicant must make arrangements for the helipad / helicopter operations at the campus to be reviewed by a suitably qualified and experienced aviation professional in consultation with relevant stakeholders. The review must consider the proposed construction methodology including plant and equipment to be used (including lighting and cranes) and recommend changes to the construction methodology and / or flight paths where required to ensure safe ongoing helicopter operations at the campus. A report summarising the outcome of the review, any recommendations, and any proposed actions must be submitted to the Certifier.	This condition is applicable to Main Works only.		Not Triggered

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2.11.	B11	<p>Environmental Management Plan Requirements Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020).</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> The <i>Environmental Management Plan Guideline</i> is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans. 	<p>A Project EMP and Sub-Plans have been developed for Early Works. The Project EMP was reviewed and verified in accordance with the following EMP Guidelines:</p> <ul style="list-style-type: none"> General requirements – Section 1 Document Control Introduction – Section 3 Purpose and Application Project description – Section 3.5 Community and Stakeholder engagement – Section 9.2, 9.6 EMS relationship – Section 3.1, 3.2 & 3.3 Structure and responsibilities – Section 6 Legal and compliance requirements – Section 4, Appendix 03 Training and awareness – Section 10 Environmental Risk Assessment – Section 7.1 Hold Points – Section 7.2 Environmental Management Measures – Section 7, Appendix 04 Monitoring program – Section 8 Inspections – Section 8 Control maps / plans – Section 7.3, Appendix 05 Environmental management documents – Appendix 01 Environmental Policy Compliance monitoring and reporting – Appendix 07 Environmental auditing – Section 11 Other environmental reporting – Section 8.2 Environmental incident and emergency planning, preparedness and response – Section 7.9, 9, Appendix 06 Corrective and preventative actions – Section 8.1 EMP review and revision process – Section 11.2 Management Review. 		Compliant
2.12.	B12	<p>Construction Environmental Management Plan 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 A23. The CEMP must include, but not be limited to, the following: (refer to B12 a-g)</p>	<p>Environmental Management Plan, Cumberland West Mental Health Services Relocation Project – Early Works (CWMHSR), Document Reference No. Pco-ENV-PLN-001, Rev 4, 17 November 2023. Prepared prior to commencement of works (notified as 4 March 2024)</p>	<p>Non-Compliance IMHC-SSD-01-NC-03: The Project EMP was not uploaded on the project website as required by Condition B12. It is recommended to implement a process to ensure documentation is continually uploaded and remains</p>	Non-Compliant

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				current on the project website as required by Condition A23 & B12.	
2.12.1.	B12(a)	<p>a. Details of:</p> <ol style="list-style-type: none"> i. hours of work; ii. 24-hour contact details of site manager; iii. management of dust and odour to protect the amenity of the neighbourhood; iv. stormwater control and discharge; v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; vi. groundwater management plan including measures to prevent groundwater contamination; and vii. external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting. 	<p>The Project EMP includes the following to address B12(a):</p> <ol style="list-style-type: none"> i. Hours of work are included under Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Noise and Vibration as 7am-6pm Monday – Friday, and 8am-1pm Saturdays. ii. Contact details for site manager as per Section 6.4 iii. Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Dust and Air Quality iv. Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Water Quality, Site Drainage and Erosion and Sediment Control v. Appendix 04 – Operational Control Procedures – Environmental Risk Action Plans vi. Groundwater management plan –Section 8.2 as part of Monthly Reporting. vii. Outdoor lighting – applies to main works and not relevant to the Milestone 4 CEMP. 		Compliant
2.12.2.	B12(b)	b. an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Archaeology / Heritage		Compliant
2.12.3.	B12(c)	c. Construction Traffic and Pedestrian Management Sub-Plan (see condition B13);	Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Traffic Management		Compliant
2.12.4.	B12(d)	d. Construction Noise and Vibration Management Sub-Plan (see condition B14);	Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Noise and Vibration		Compliant
2.12.5.	B12(e)	e. Construction Waste Management Sub-Plan (see condition B14(h))	<p>Appendix 04 – Operational Control Procedures – Environmental Risk Action Plans:</p> <ul style="list-style-type: none"> • Waste • Hazardous / Contaminated Material • Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements 		Compliant
2.12.6.	B12(f)	f. Construction Soil and Water Management Sub-Plan (see condition B16); and	<p>Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan:</p> <ul style="list-style-type: none"> • Water Quality, Site Drainage and Erosion and Sediment Control • Concrete Washout 		Compliant
2.12.7.	B12(g)	g. Construction Flood Emergency Management Sub-Plan (see condition B17)	Appendix 06 – Emergency Preparedness and Response – Flooding + Soil and Flood Management Plan by Arup.		Compliant

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2.13.	B13	<p>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)</p> <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> <ol style="list-style-type: none"> a. be prepared by a suitably qualified and experienced person(s); b. be prepared in consultation with Council and TfNSW; c. detail: <ol style="list-style-type: none"> 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; ii. measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs; iii. heavy vehicle routes, access and parking arrangements; 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 accordance with the latest version of AS 2890.2; and 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). 	<p>IMHC Early Works Construction Traffic Management Plan Prepared for: RobertsCo by Stantec, Ref: 301400181, Rev A, 28 August 2023</p> <ol style="list-style-type: none"> a. Prepared by Stantec. b. Council and TfNSW are not affected, all within hospital grounds. Mons Road is an existing contractor car parking area. Included as part of the original SSDA (Section 4.1.4) c. Details: <ol style="list-style-type: none"> i. Section 3.5.2 Cycling, Section 5.4 Pedestrian Management, Section 5.5 Car Parking Impacts, Section 5.6 Public Transport (no impact expected) – Section 3.4.2 Existing Services, Table 3.3: Existing public transport services. ii. Section 5.4 Pedestrian Management iii. Section 4.9 Construction Vehicle Routes + Figure 4.4 iv. Appendix B Swept Path Assessment v. Section 4.8 Construction Vehicle Staging Area. 		Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
2.14.	B14	<p>Construction Noise and Vibration Management Sub-Plan</p> <p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a. be prepared by a suitably qualified and experienced noise expert; b. describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); c. describe procedures for limiting structural damage caused by vibration in accordance with the latest version of DIN 4150-3 (1992-02) Structural vibration – Effects of vibration on structures (German Institute for Standardisation, 1999); d. describe the measures to be implemented to manage high noise and vibration generating works such as piling, in close proximity to sensitive receivers; e. include strategies that have been developed with the community for managing high noise generating works; f. describe the community and other stakeholder consultation undertaken to develop the strategies in condition B14; g. include a complaints management system that would be implemented for the duration of the construction; and h. 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 B11. 	<p>Construction Noise and Vibration Management Plan, ref 20230763.1/2408A/R1/RF, Rev 1, 24 August 2023.</p> <ul style="list-style-type: none"> a. Developed by Acoustic Logic b. Section 6 Noise Management Levels, Section 9.7 Control of Construction noise and vibration – procedural steps. c. Section 6.2 Vibration Objectives. d. Section 9 Specific Noise Controls e. Section 9 Specific Noise Controls f. Section 10 Community Interaction and Complaints Handling g. Section 10 Community Interaction and Complaints Handling h. Section 8 Ground Vibration Impacts: Vibration monitoring recommended in event of complaints or concern for structural damage to nearby buildings / vibration sensitive equipment. Section 8.2 Vibration monitoring (mainly recommended for sensitive hospital equipment or following complaints). Section 9.6.8 Noise Monitoring & Section 9.6.9 Vibration Monitoring. 		Compliant
2.15.	B15	<p>Construction Waste Management Sub-Plan</p> <p>The Construction Waste Management Sub-Plan (CWMSMP) must address, but not be limited to, the procedures for the management of waste including the following:</p> <ul style="list-style-type: none"> 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; 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. 	<p>Construction Waste Management Plan developed as part of the REF by JBS&G Australia Pty Ltd, 60807/142050, Rev 1, dated 13 October 2022</p> <ul style="list-style-type: none"> a. Section 4.2 Waste Streams and Classification – Table 4.2 Potential Waste Types and Classifications. Section 5 Construction Waste Quantities. Section 6 Waste Management. b. Section 6.1.2 and 6.1.3. Liaise with local council to dispose at appropriate locations. c. confirmation of the contamination status of the development areas of the site based on the validation results – Section 2.3 Existing Environmental – refer to the RAP. 		Compliant
2.16.	B16	<p>Construction Soil and Water Management Sub-Plan</p> <p>The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:</p>	<p>Cumberland West Mental Health Services Relocation, Integrated Mental Health Complex Early Works – Construction Soil and Water Management Plan & Construction Flood Emergency Response Sub-</p>		Compliant

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		<ul style="list-style-type: none"> a. be prepared by a suitably qualified expert, in consultation with Council; b. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; c. describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'; d. direct all sediment laden water in overland flow away from the leachate management system and prevent cross-contamination of clean and sediment or leachate laden water. e. provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); f. detail all off-site flows from the site; and g. describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI and 1 in 100-year ARI. 	<p>Plan, Reference: CWMH-ARP-CV-RP-PS-9-XX010, Rev B 15 February 2024</p> <ul style="list-style-type: none"> a. Prepared by Arup Australia Pty Ltd, ABN 76 625 912 665. Section 1.5 Qualification states: This CSWMP and the FERSP were prepared and reviewed by suitably qualified and experienced engineers from the Arup Civil team, who hold good working knowledge of the relevant standards, specifications and conditions applicable to this project. b. Section 4.2 Erosion and Sediment Controls Descriptions – Temporary Construction Access c. Section 4.3, Soil and Water Implementation, 4.3.1 Surface Water Management & Appendix A d. Section 4.2 Erosion and Sediment Controls Descriptions – Straw Bales, Sediment Fence, Diversion Bank and Channel; Section 4.3 & Appendix A e. Section 4.3.4 Wet Weather Management f. Section 4.3 & Appendix A g. Section 4.3.1 – 4.3.1.1 to 4.3.1.3. 		
2.17.	B17	<p>Construction Flood Emergency Management Sub-Plan</p> <p>The Construction Flood Emergency Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a. be prepared by a suitably qualified and experienced person(s); b. address the provisions of the Floodplain Risk Management Guidelines (EHG); and c. include details of: <ul style="list-style-type: none"> i. the flood emergency responses for both construction phases of the development; ii. predicted flood levels; iii. flood warning time and flood notification procedures for construction workers on site; iv. assembly points and evacuation routes; v. evacuation and refuge protocols; and vi. awareness training for employees and contractors, and users/visitors. 	<p>Cumberland West Mental Health Services Relocation, Integrated Mental Health Complex Early Works – Construction Soil and Water Management Plan & Construction Flood Emergency Response Sub-Plan, Reference: CWMH-ARP-CV-RP-PS-9-XX010, Rev B 15 February 2024.</p> <ul style="list-style-type: none"> a. Prepared by Arup Australia Pty Ltd b. Addressed under Section 5 c. Includes details of: <ul style="list-style-type: none"> i. Section 5.2 Roberts Co – Cumberland West Mental Health Services Relocation Emergency Response Plan including Emergency Coordination Procedure & Inundated with Water (Flooding) procedure. ii. Section 5.1 Predicted Flood Levels. iii. Section 5.3 Flood Monitoring iv. Section 5.4 Flood Response. Section 5.4.1 On-Site Evacuation Procedure – nominated emergency assembly point in the event of a flood is on the southern side of Dragonfly Drive, adjacent to the site entrance. Evacuation route marked as per Figure 24 Flooding Evacuation Route and Emergency Assembly Point. v. Section 5.4.1 On-Site Evacuation Procedure – alternative emergency exit from the south-eastern corner of the Milestone 4 site area to Redbank Road. 		Compliant

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			vi. Section 5.6 Training		
2.18.	B18	<p>Driver Code of Conduct</p> <p>A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:</p> <ul style="list-style-type: none"> 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. 	As per WHSMP RCo-WHS-PLN-001-WHS MANAGEMENT PLAN, Rev 03, 9 February 2024. Page 86 Appendix 9 – Heavy Vehicle Driver – Code of Conduct. Included as part of CDVC#2, Item 21: Work, Health and Safety (WHS) Management Plan to satisfy SSD Condition B18.		Compliant
2.19.	B19	<p>Construction Parking</p> <p>Prior to the commencement of any construction, the Applicant must provide sufficient construction vehicle parking facilities on-site, including for heavy vehicles, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.</p>	CTMP Section 4.4 Construction Worker Parking. Includes map of parking location. Also sighted as part of induction. Mons Road used for heavy vehicles waiting area. Following phone call confirmation, vehicles can enter site as permitted.		Compliant
2.20.	B20	<p>Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be published on the Applicant's website in accordance with condition A34. This condition cannot be staged.</p>	<p>As part of the CTMP Section 4.4 Construction Worker Parking. Includes map of parking location and states that given the site's proximity to high frequency public transport services, all workers will be encouraged to use public transport to access the work site. Submitted to the Certifier, Aconex reference: RobCo-GCOR-001383, 10 November 2023, prior to commencement of Milestone 4.</p> <p>Sighted as part of induction – Mons Road. Only 20-25 workers for early works.</p>	<p>Non-Compliance</p> <p>IMHC-SSD-01-NC-04:</p> <p>The Construction Management Plan, which includes the Construction Worker Transportation Strategy, is not included on the project website which is a requirement of Condition B20. It is recommended to implement a process to ensure documentation is continually uploaded and remains current on the project website as required by Condition A23 & B20.</p>	Non-Compliant
2.21.	B21	<p>Flood Management and Mitigation</p> <p>Prior to the commencement of the relevant construction stage, the Applicant must provide evidence from a suitably qualified civil or structural engineer to the Certifier confirming that:</p> <ul style="list-style-type: none"> a. all habitable floor levels are no lower than the 1% Annual Exceedance Probability flood plus 500mm of freeboard and that the clinical facilities and essential plant are above the PMF level, and that the development achieves the required flood planning levels outlined in Integrated Mental Health Complex Flood Impact Assessment SSD-44034342, prepared by Arup, dated 10 October 2023. b. any structures below the PMF level will be constructed from flood compatible building components having regard to the 	<p>As per Arup statement linked to condition A17: Design Certificate issued – dated 21 February 2024 by Arup, ref 281916. Notes compliance with Condition A17 and B21(b). Part of CDVC#2, 21 February 2024, Item 6: Structural Design Certificate, with note from Certifier: "this is also to satisfy SSD Conditions A17, B3 and B26</p> <p>Applicable to B21(b) only.</p> <p>Remaining sub-conditions (a), (c), (d), and (e) are relevant to Main Works.</p>		Compliant

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		<p>hydrodynamic forces from moving flow and the hydrostatic forces applied by still-water during any period of flood inundation and/or submerging events.</p> <p>c. the structural integrity of the building has been designed to ensure safe and secure shelter-in-place of vulnerable persons as outlined in the Site Flood Emergency Response Plan prepared by ARUP dated 10 October 2023, both during the PMF flood event and after the PMF flood event until flood waters have receded and it is safe to leave the building.</p> <p>d. the building has been designed so that the part of the building that will be used for egress by those sheltering in place during a PMF event (or other submerging events) will be safe to be used for this purpose after the flood waters recede from the PMF event (or other submerging events) described in the <i>Integrated Mental Health Complex Flood Impact Assessment SSD-44034342</i>, prepared by Arup, dated 10 October 2023.</p> <p>e. the building would comply with relevant BCA requirements and Australian Standards and the supplementary 'Construction of buildings in flood hazard areas' guidance with regard to structural adequacy during a PMF event described in the <i>Integrated Mental Health Complex Flood Impact Assessment SSD-44034342</i>, prepared by Arup, dated 10 October 2023, and that these BCA requirements and Australian Standards are listed.</p>			
2.22.	B22	The evidence required under condition B21 is to be made available to the Planning Secretary with seven days upon request.	No requests from DPHI.		Not Triggered
2.23.	B23	<p>Operational Noise – Design of Mechanical Plant and Equipment</p> <p>Prior to installation of mechanical plant and equipment:</p> <p>a. a detailed assessment of mechanical plant and equipment with compliance with the relevant project noise trigger levels as recommended in the <i>'Noise and Vibration Impact Assessment'</i> prepared by Acoustic Logic dated 25 August 2023 must be undertaken by a suitably qualified person; and</p> <p>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 specific noise levels identified in the <i>'Noise and Vibration Impact Assessment'</i> prepared by Acoustic Logic and dated 25 August 2023.</p>	Mechanical plant and equipment applicable to Main Works only.		Not Triggered
2.24.	B24	Operational Access, Car Parking and Service Vehicle Arrangements	Operational parking and access facilities, and access arrangements are applicable to Main Works only.		Not Triggered

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
		<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> <ul style="list-style-type: none"> a. a minimum of 27 additional on-site visitor 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 (2009); and 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. 			
2.25.	B25	<p>Site Contamination</p> <p>Prior to the commencement of construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.</p>	<p>Senversa are engaged as the NSW EPA-accredited Site Auditor. Interim Audit Advice No. 2 dated 24 February 2024 presented as per Remedial Action Plan (RAP) Rev 7 - 60807/139612, 25 November 2022. Site Auditor confirmed that the site is suitable for the proposed uses subject to the successful implementation of the RAP Revision 7, applicable to the works under Milestone 4.</p>		Compliant
2.26.	B26	<p>Geotechnics and Piling</p> <p>The construction drawings must incorporate the recommendations set out in the Geotechnical Investigation prepared by JKGeotechnics dated 25 July 2022 (where applicable) in relation to excavation support, ground anchors, footings, piles and excavation or piling below the groundwater table (if relevant).</p>	<p>Geotechnics and piling recommendations as per Coates Hire approval of launch pits.</p> <p>e.g., 6-7m deep excavation for shoring box – launch pit 7 approval from Coates Hire as per letter dated 14 May 2024, Document No. 2607261-C-LP7.</p>		Compliant
3.	C	DURING CONSTRUCTION			
3.1.	C1	<p>Site Notice</p> <p>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:</p> <ul style="list-style-type: none"> 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 	<p>Site signage with contact numbers was evident during the audit site inspection.</p> <ul style="list-style-type: none"> a. Appeared to be minimum dimensions in size. b. Durable and waterproof. Available at various locations. c. Contact details included. d. Mounted at eye level. 		Compliant

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		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.			
3.2.	C2	<p>Operation of Construction Plant and Equipment</p> <p>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.</p>	<p>Pre-start form, on site Plant ID No. 55109E for Supreme Earthmoving Serial No. HCMDA-420E000988853 Plant ZXI35US last service 2023 next service due 650 hrs (90 left). Purpose: for excavation works at BIRS. LSC400 – model No BM400LSC.</p> <p>Pre-start form, onsite Plant ID No. 317, Serial No. 503347, Komatsu, Plant Model PC210LC-11 reviewed 28 May 2024, checked by Roberts Co. and signed 3 June 2024.</p> <p>Pre-start form, onsite Plant ID No. V-1, Serial No. 70941 for Pezzimenti Tunnelbore Plant Model VAC-1, reviewed 11 April 2024; for pumping out drill waste into container. Signed by Roberts Co. 1 May 2024. Service Record presented for VAC-1 dated 5 March 2024, Asset No. 232.</p> <p>Service Record also presented for PP-4, major service undertaken on 27 March 2024.</p> <p>Plant Register and Maintenance Register by Cherrie Civil – all plant comes through to Cherrie onsite and off-site from April 2024 – No. 19 Bortec boring rig, BM400SLC 23/09/2023 to 23/09/2024.</p>		Compliant
3.3.	C3	<p>Demolition</p> <p>Demolition work must comply with the demolition work plans required by <i>Australian Standard AS 2601-2001 The demolition of structures</i> (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B9.</p>	No demolition work associated with Milestone 4. This was actioned under the REF Approval (Milestone 3).		Not Triggered
3.4.	C4	<p>Construction Hours</p> <p>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <ol style="list-style-type: none"> between 7am and 6pm, Mondays to Fridays inclusive; and between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays 	Hours are as communicated during inducted and as per site notice.		Compliant
3.5.	C5	<p>Construction Hours</p> <p>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:</p> <ol style="list-style-type: none"> between 6am and 7am, and 6pm and 7pm, Mondays to Fridays inclusive; and 	No out of hours work currently required. Monitoring being undertaken under the REF approval by Acoustic Logic: Pathology Building Project ID 20230763.5 dated 22 April 2024 (Rev 0). Conclusion states that covered noise monitoring period between 22 February to 26 March 2024 + vibration monitoring period 23 February to 29 March 2024. Noise levels were below criteria.		Not Triggered

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		b. between 1pm and 4pm, Saturdays.			
3.6.	C6	<p>Construction Hours</p> <p>Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:</p> <ul style="list-style-type: none"> 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; e. or where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works. 	No out of hours work currently required. No emergencies or deliveries as per Condition C6.		Not Triggered
3.7.	C7	<p>Construction Hours</p> <p>Notification of such construction activities as referenced in condition C6 must be given to affected stakeholders (including hospital campus occupants) before undertaking the activities or as soon as is practical afterwards.</p>	No out of hours work currently required. The project applies the Disruption Notice process for any notifications which are communicated to the LHD and Children's Hospital.		Not Triggered
3.8.	C8	<p>Construction Hours</p> <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. 	Piling yet to commence under Milestone 4, however it is set to occur during standard construction hours only.		Not Triggered
3.9.	C9	<p>Construction Hours</p> <p>Construction activities relating to internal fit-out works may be undertaken outside of the hours in condition C4 and C5 if required, provided that:</p> <ul style="list-style-type: none"> a. management and mitigation measures are implemented in accordance with the practices outlined in Noise and Vibration Impact Assessment prepared by Acoustic Logic and dated 25 August 2023. b. the façade near where the works are being conducted is entirely closed during extended construction hours. 	Internal fit out works under Main Works only.		Not Triggered

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
		c. deliveries for the internal fit-out works are undertaken during the approved construction hours in condition C4.			
3.10.	C10	<p>Implementation of Management Plans</p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).</p>	<p>All plans are available on Aconex. Weekly inspection 'walks' undertaken to implement management plans.</p> <p>RConstruct actions presented, only one action showing as open which was raised only a week ago and in the process of being closed out.</p> <p>HSE walk RobCo-GCOR-003051 on 19 April 2024 – workers signatures required on Excavation permit. Actions included: Geofab near LP2 along Redbank Road requiring reinstatement. Cherrie Civil responded 20 May 2024. Reinstated with photo close out. Aconex is used to summarise the overall items for action and close out. Entered in RConstruct dated 8 May 2024 with completed status.</p>	<p>Opportunity for Improvement IMHC-SSD-01 OFI-01:</p> <p>During the site inspection, a truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water. There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / toolbox to be actioned.</p> <p>Further observations included:</p> <ul style="list-style-type: none"> Missing protection of pit drain – this was rectified immediately. Stockpile noted to be quite steep in parts, however this is being progressively reused onsite. <p>Refer to photos included as part of this report.</p>	Compliant
3.11.	C11	<p>Construction Traffic</p> <p>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.</p>	<p>Vehicles observed to be wholly within the site during inspection. No work zones required.</p>		Compliant
3.12.	C12	<p>Hoarding Requirements</p> <p>The following hoarding requirements must be complied with:</p> <ol style="list-style-type: none"> no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and 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. 	<p>Secured fencing observed surrounding site. No evidence of third-party advertising or vandalism. Included in weekly inspections.</p> <p>One complaint associated with graffiti across from Redbank School. Worker had painted a profanity then immediately painted over it. Worker toolbox actioned. Email to Redbank 8 March 2024; Redbank responded same day and satisfied with close out.</p> <p>Roberts Co to TSA – RobCo-GCOR-002513 on 4 March 2024 confirming action and close out.</p>		Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
3.13.	C13	No Obstruction of Public Way 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.	Public way noted to be unobstructed during site inspection.		Compliant
3.14.	C14	Construction Noise Limits The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (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.	Hoarding in place to reduce impact. Spare noise blankets available onsite for use. Disruption Notice process ensures cumulative impacts are managed with the concurrent works at the Children's Hospital.	Opportunity for Improvement IMHC-SSD-01-OFI-02: Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorptive surface facing outwards. There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.	Compliant
3.15.	C15	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.	No trucks arriving outside standard construction hours. Heavy vehicles are instructed to wait at Mons Road parking area until permitted onsite.		Compliant
3.16.	C16	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.	Vehicle noted to have non-tonal reverse alarm instead of beeper.		Compliant
3.17.	C17	Vibration Criteria Vibration caused by construction at any education facility, childcare centre or residence must be limited to: a. for structural damage, the latest version of <i>DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures</i> (German Institute for Standardisation, 1999); and b. for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: a technical guideline</i> (DEC, 2006) (as may be updated or replaced from time to time).	Currently no vibratory works occurring onsite under Milestone 4. Child Care Centre site inspection every Tuesday (sighted calendar invite 21 May 2024) Disruption Notice process for consultation. Will be implemented for any works causing vibration.		Not Triggered
3.18.	C18	Vibratory compactors must not be used closer than 30m from education facility, childcare centre or residence buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C17.	Currently no vibratory works occurring onsite under Milestone 4. Vibration monitoring in place under REF approval at Pathology building. No exceedances recorded.		Not Triggered
3.19.	C19	The limits in conditions C17 and C18 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B14 of this consent.	Currently no vibratory works occurring onsite under Milestone 4.		Not Triggered

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3.20.	C20	<p>Tree Protection</p> <p>For the duration of the construction works:</p> <ol style="list-style-type: none"> all trees on the site that are not approved for removal must be suitably protected during construction; and 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. 	<p>During the audit site inspection:</p> <ol style="list-style-type: none"> Tree protection in place as observed. Refer to photos. No access required to protected tree areas. Works still in progress. <p>Plateau Trees actioned the tree removal. Internal platform RConstruct demonstrated for Plateau Trees personnel. Certificate sighted: AHC30816 Certificate III in Arboriculture dated 27 April 2018, Certificate No. 000654.</p>		Compliant
3.21.	C21	<p>Air Quality</p> <p>The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.</p>	As per implementation of the Project EMP Appendix 04: Dust and Air Quality. No dust evident during site inspection. Rumble grid in place at site entry.		Compliant
3.22.	C22	<p>Air Quality</p> <p>During construction, the Applicant must ensure that:</p> <ol style="list-style-type: none"> activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; all trucks entering or leaving the site with loads have their loads covered; trucks associated with the development do not track dirt onto the public road network; public roads used by these trucks are kept clean; and land stabilisation works are carried out progressively on site to minimise exposed surfaces. 	<p>During the audit site inspection:</p> <ol style="list-style-type: none"> No dust observed. No material was being removed off-site. Loads covered is noted to be a standard practice. No tracking noted on Redbank Road or Dragonfly Drive. Internal hospital roads kept clean and clear. Project does not impact public roads. Hardstand areas at site entry. 		Compliant
3.23.	C23	<p>Imported Fill</p> <p>The Applicant must:</p> <ol style="list-style-type: none"> 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; keep accurate records of the volume and type of fill to be used; and make these records available to the Certifier and/or the Planning Secretary within seven days upon request. 	Imported fill is not engineered fill. Only bedding or aggregate applicable to Milestone 4. Cherrie Civil Material Tracking Register in place.		Not Triggered

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3.24.	C24	<p>Disposal of Seepage and Stormwater</p> <p>Adequate provisions must be made to collect and discharge stormwater drainage during construction. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.</p>	No water discharge occurring.		Not Triggered
3.25.	C25	<p>Emergency Management</p> <p>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.</p>	<p>Emergency training as communicated during induction. Nurse calls and emergency evacuation diagrams posted onsite. Roberts Co. have a WHS Management Plan which includes emergency evacuation (Section 14), RCo-WHS-PLN-001-WHS MANAGEMENT PLAN, Rev 3, 9 February 2024.</p> <p>Site Notice board within the site boundary includes all relevant information including emergency evacuation map.</p>		Compliant
3.26.	C26	<p>Stormwater Management System</p> <p>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 Certifier for approval. The system must:</p> <ol style="list-style-type: none"> be designed by a suitably qualified and experienced person(s); be generally in accordance with the conceptual design in Appendix HH to the EIS ('Civil Design Report and Integrated Water Management Plan', prepared by Arup and dated 14 December 2022) were appropriate; be in accordance with applicable Australian Standards; and ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff (Engineers Australia, 2016)</i> and <i>Managing Urban Stormwater: Council Handbook (EPA, 1997)</i> guidelines. 	<p>IMHC-ARU-CI-DG-0-0601 Stormwater Management, Rev 02 on 19 February 2024 by Arup Australia Pty Ltd. Included as part of CDCV#2 under Civil drawings. Actioned prior to commencement of construction.</p> <p>Cumberland West Mental Health Services Relocation, Early Works Milestone 4, Civil Design Certificate, ref IMHC-ARU-CI-DC-00-0002, 15 February 2024, includes certification of:</p> <ul style="list-style-type: none"> Stormwater Design in accordance with Australian Rainfall and Runoff 2019 Stormwater Design in accordance with AS/NZS 3500.3:2018 Plumbing and drainage Part 3: Stormwater Drainage <p>Hydraulic Design Certificate also presented: IMHC-HPA-HY-DC-0001 dated 23 August 2023 Rev 1, by Harris Page & Associates Pty Limited. Included under CSVC#2, Item 17.</p>		Compliant
3.27.	C27	<p>Aboriginal Cultural Heritage</p> <p>Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by Comber Consultants and dated 5 October 2022.</p>	Unexpected finds procedure as per recommendations Project EMP Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Archaeology / Heritage Communicated as per Project induction.		Compliant
3.28.	C28	<p>Unexpected Finds Protocol – Aboriginal Heritage</p> <p>In the event that surface disturbance identifies a new Aboriginal object:</p> <ol style="list-style-type: none"> all works must halt in the immediate area to prevent any further impacts to the object(s); a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is 	No unexpected finds to date. Unexpected finds procedure in place.		Not Triggered

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		<p>managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;</p> <p>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</p> <p>e. works may only recommence with the written approval of the Planning Secretary.</p>			
3.29.	C29	<p>Unexpected Finds Protocol – Historic Heritage</p> <p>If any unexpected archaeological relics are uncovered during the work, then:</p> <p>a. all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;</p> <p>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</p> <p>c. works may only recommence with the written approval of the Planning Secretary.</p>	No unexpected finds to date. Unexpected finds procedure in place. Inspection actioned by Comber on 20 May 2024 during pot holing works, no tramline present. Report still to be issued.		Not Triggered
3.30.	C30	<p>Waste Storage and Processing</p> <p>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.</p>	Waste bins available onsite as observed during the site inspection.		Compliant
3.31.	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).	The following waste dockets were presented during the audit: 004KBT 18 April 2024 – 37.46T for GSW-A – Docket No. EPI100835\1 to Erskine Park. BB0063 18 April 2024 – 32.74T for GSW-A – Docket No. EPI100836\1. Approval No. A24047. Bulk Transport Solutions EPL No. 13340.		Compliant
3.32.	C32	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	No concrete waste or rinse water disposed onsite.		Compliant
3.33.	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.	Waste managed by Cherrie Civil. GSW disposal register in place. Exported Materials Tracking sighted from August 2023 to April 2024 e.g., STG202 BIRS mound GSW-A to Erskine Park. Docket No. STM5338W\1 on 19 December 2023 for GSW/A to Cleanaway – LTS Sydney Solids St Marys.		Compliant

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3.34.	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.	<p>JBS&G engaged onsite for daily monitoring. Friable asbestos contained onsite within designated area as sighted during inspection.</p> <p>004KBT 18 April 2024 – 37.46T for GSW-A – Docket No. EPI100835\1 to Erskine Park.</p> <p>BB0063 18 April 2024 – 32.74T for GSW-A – Docket No. EPI100836\1. Approval No. A24047. Bulk Transport Solutions EPL No. 13340.</p> <p>Email from JBS&G dated 17 April 2024 – “please take this email as interim asbestos clearance for the excavation works and application of marker layer at the walls of the excavation of Launch Pit 7 and the ground surface around Launch Pit 7... At the time of inspection, no residual visible asbestos was observed to the ground surface in the asbestos removal area, or vicinity of the area. Airborne asbestos fibre monitoring completed during the asbestos works showed that the airborne asbestos fibre levels were less than 0.01 fibres/mL during all asbestos removal activities. The designated area known as Launch Pit 7 is suitable to be re-occupied under non-asbestos controlled conditions.”</p> <p>Additional email provided by JBS&G on 18 April 2024 “Confirming Launch pit 7 NEPM Asbestos base validation results were satisfactory. Therefore, it is suitable to continue excavation works under non-asbestos conditions.”</p> <p>Certificate of Analysis Lab report 1086213-AID, sampled on 10 April 2024, report dated 11 April 2024 showing no traces of asbestos.</p>		Compliant
3.35.	C35	<p>Outdoor Lighting</p> <p>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.</p>	Outdoor lighting will be applicable to Main Works only.		Not Triggered
3.36.	C36	<p>Site Contamination</p> <p>Prior to the commencement of any work that would result in the disturbance of potential or contaminated soils, materials, groundwater or sediments, the Applicant must conduct site investigations to confirm the full nature and extent of the contamination at the project area and comply with the following requirements:</p> <ol style="list-style-type: none"> the site investigations must be undertaken, and the subsequent report(s), must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the <i>Contaminated Land Management Act 1997</i>; the reports must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand’s Certified Environmental 	<p>Detailed site investigations undertaken as per previous Milestones under the REF:</p> <ol style="list-style-type: none"> As per the Remedial Action Plan, Rev 7 by JBS&G, Section 3.5, JBS&G conducted a Detailed Site Investigation which involved a detailed site inspection and 42 soil sample locations, with 3 locations converted into monitoring wells. CEnvP(SC) engaged from JBS&G, Specialist Certification Number, SC41060 JBS&G monitor air quality and activities onsite daily. <p>No additional DSI was required following the original included as part of the RAP.</p>		Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
		Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme; and c. the recommendations of the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7).			
3.37.	C37	Site Contamination The unexpected finds procedure within the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) must be updated following results of further site investigations undertaken in accordance with condition C36 and implemented throughout duration of project work.	Everything treated as contaminated; no unexpected finds. Unexpected Finds Protocol – addressed in the Project EMP Appendix 04 – Operational Control Procedures – Environmental Risk Action Plan: Hazardous / Contaminated Material; 8.2 Contingency Scenarios, as per Asbestos Management Plan.		Compliant
3.38.	C38	Site Contamination Remediation of the site must be carried out in accordance with the Remedial Action Plan prepared by JBS&G and dated 25 November 2022 (60807/139612 Rev 7) and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	Remedial Action Plan Rev 7 presented during the audit. Section 9.6 describes a Material Tracking Plan with Material Tracking Data requirements listed in Section 9.6.1. Cherrie Civil have developed a Material Tracking Register. A comparison to the RAP requirements to the register is as follows. <ul style="list-style-type: none"> • Date (yyyy/mm/dd) – Date column starting at 31/08/2023 (during earlier milestones) to 29/05/2024 • Unique MTF identification (starting at 001) – Unique MTF column, starting at '1' to '876'. • Site figure showing source (cut) and placement (fill) – not included • Estimated volume (cubic metres) - Volume (Estimate) column – last entry recorded as 13.73, however it does not specify this is in cubic metres, only that it differs to the tonnage volume recorded. • Type of material – last entry recorded Sandstone for bedding material. Section 9.6.2 also referenced within a separate table. • Depth of source (RL) – RL Taken column e.g., 16.95 on 18/04/2024 from BIRS (MTF ref 688) • Depth of placement (RL) – RL Placed column e.g., MTS 749 from Launch Pit 8 to Contractors Yard, 16.00 • Source (from) information in terms of MGA56 coordinates as established by site GPS and/or survey – not included. • Placement (to) information in terms of MGA56 coordinates as established by site GPS and/or survey – not included. • Source (from) information in terms of site feature – Source/Lot column e.g., BIRS on 09/04/2024, MTS 659. 	Non-Compliance IMHC-SSD-01-NC-05: The Material Tracking Register presented did not fully address all the requirements as per RAP Section 9.6. It is recommended to further develop the existing material tracking register to fully meet the requirements of the RAP.. Additional Opportunities for Improvement were identified during the audit as follows: IMHC-SSD-01_OFI-03: During the site inspection, signage was not present for stockpiled materials. It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled. IMHC-SSD-01_OFI-04: Placement of air monitors did not appear to be within breathing height. It is	Non-Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
			<ul style="list-style-type: none"> Placement (to) information in terms of site feature – Destination column e.g., MTF 795 to Stockpile design BIRS on 16/05/2024 Source (from) information in terms of Separable Portion; - not included. Placement (to) information in terms of Separable Portion; - not included Source (from) information from off-site source site (e.g. Quarry A); - Supplier column + Rego column e.g., SMZ Layer for Piling Pad from CCE, rego XO61PX on 29/05/2024, MTF 853. Placement (to) information for off-site disposal (e.g., tip, EPA tracking number, docket reference); - not included Reference document (where necessary, i.e. VENM / ENM classification); - Material classification column e.g., GSW-A on 22/05/2024, MTF 826. Purpose of placement (i.e. containment, surplus to site requirements etc); - Purpose column e.g., Backfill Hot Water Pipe Removal on 22/05/2024, MTF 821. Comments (when required). – not included, however may not be required. 	<p>recommended their placement be reviewed with the onsite hygienist.</p> <p>IMHC-SSD-01 OFI-05: During the site inspection it was observed asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary. It is recommended to reconsider placement of exclusion zone boundary with the onsite hygienist.</p> <p>Note: Airborne asbestos monitoring results displayed onsite were one day old. This was updated during the audit.</p>	
3.39.	C39	Where remediation is carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	Remediation under Milestone 4 works is not staged. A single Site Audit Statement will be issued at the end of the works. Senversa are engaged as the site auditor.		Not Triggered
3.40.	C40	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	Everything treated as contaminated. No changes in risk.		Not Triggered
3.41.	C41	Independent Environmental Audit Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	This is the first independent audit of the project under the SSD conditions and has been conducted within 12 weeks of commencement of construction (4 March 2024) as per IAPAR 2020 requirements.		Compliant
3.42.	C42	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	APP is engaged as the independent auditor, approved by DPHI as per letter dated 21 February 2024, NSW Planning ref: SSD-44034342-PA-1, Westmead Integrated Mental Health Complex-Independent auditor agreement in response to auditing team submission dated 8 February 2024.		Compliant
3.43.	C43	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.	No requests to undertake audits outside the required timeframes.		Not Triggered

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3.44.	C44	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: <ul style="list-style-type: none"> a. review and respond to each Independent Audit Report prepared under condition C41 of this consent, or condition C43 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 agreed by the Planning Secretary. 	This is the first independent audit of the project with the audit report requirements not yet triggered.		Not Triggered
3.45.	C45	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.	This is the first independent audit of the project with the audit report requirements not yet triggered.		Not Triggered
3.46.	C46	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.	Operational audits to be triggered following completion of works. This is not yet triggered.		Not Triggered
3.47.	C47	Water Take and Licensing In the event groundwater is intercepted during construction, any take is to be appropriately licenced where required (unless eligible for an exemption under the Water Management Regulation 2018).	Not applicable. No licence required.		Not Triggered
3.48.	C48	Geotechnical Investigation The recommendations outlined within the Geotechnical Investigation prepared by JKGeotechnics dated 25 July 2022 must be adhered to throughout the construction process.	Geotechnical recommendation that ground bearing capacity at 100kpa as designed by ARUP e.g., Aconex dated 24 August 2023 from ARUP requesting Geotech design; 31 October 2023 from JK Geotechnics – sent to OveArup-GCOR-001367 Mail No. JKG-GCOR-000058.		Compliant
4.	APPX 1	ADVISORY NOTES			
4.1.	AN1	General All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	No licences or permits required at this stage of works.		Not Triggered
4.2.	AN2	Long Service Levy For work costing \$250,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Corporation on 131 441.	Evidence of payment presented: Long Service Levy Receipt No. L0000125606 (For Early Works Only) dated 14 August 2023. Included on Crown Design Verification Certificate # 1, item 3.		Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
4.3.	AN3	Legal Notices Any advice or notice to the consent authority must be served on the Planning Secretary.	No legal notices.		Not Triggered
4.4.	AN4	Access for People with Disabilities The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	Disability access is not relevant to Milestone 4 works. This will fall under the Main Works phase.		Not Triggered
4.5.	AN5	Utilities and Services Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Sydney Water Section 73 for Tap in – certificate will be released on completion of works. Approved drawings package with stamp 25 January 2024 sighted. For wastewater and water. This will lead into Milestone 4 piling.		Compliant
4.6.	AN6	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	No above ground works associated with Milestone 4. This will be triggered under Main Works.		Not Triggered
4.7.	AN7	Road Occupancy Licence A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	No Road Occupancy Licences required.		Not Triggered
4.8.	AN8	SafeWork Requirements To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements	Site observed during audit inspection as locked and secured with hoarding and fencing in place for restricted access. Workers observed in full PPE + hazmat suits for asbestos areas.		Compliant
4.9.	AN9	Hoarding Requirements The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	No approval required as works are not on Council land.		Not Triggered
4.10.	AN10	Handling of Asbestos The Applicant must consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – ‘Transportation and management of asbestos waste’ must also be	As per SafeWork notification 943R-00386768-01 11 August 2023 for 17 August 2023. One notification actioned for the whole of the site.		Compliant

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
		complied with.			
4.11.	AN11	<p>Fire Safety Certificate</p> <p>The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.</p>	The fire safety certificate will apply to Main Works and shall be triggered at operation.		Not Triggered
5.	APPX 2	APPENDIX 2: WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS			
5.1.	1.	<p>Written Incident Notification Requirements</p> <p>A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A25 or, having given such notification, subsequently forms the view that an incident has not occurred.</p>	No material harm or notifiable incidents have occurred.		Not Triggered
5.2.	2.	<p>Written notification of an incident must:</p> <ol style="list-style-type: none"> identify the development and application number; provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); identify how the incident was detected; identify when the applicant became aware of the incident; identify any actual or potential non-compliance with conditions of consent; describe what immediate steps were taken in relation to the incident; identify further action(s) that will be taken in relation to the incident; and identify a project contact for further communication regarding the incident. 	No material harm or notifiable incidents have occurred.		Not Triggered
5.3.	3.	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	No material harm or notifiable incidents have occurred.		Not Triggered
5.4.	4.	<p>The Incident Report must include:</p> <ol style="list-style-type: none"> a summary of the incident; outcomes of an incident investigation, including identification of the cause of the incident; 	No material harm or notifiable incidents have occurred.		Not Triggered

Integrated Mental Health Complex

Independent Environmental Audit

ID No	SSD No.	Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance rating
		<ul style="list-style-type: none">c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; andd. details of any communication with other stakeholders regarding the incident.			

Appendix F – Consultation

Consultation with the Department of Planning, Housing and Infrastructure:

Barbara Pater

From: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>
Sent: Friday, 10 May 2024 11:04 AM
To: Barbara Pater
Cc: Thomas Minchin; Elizabeth Williamson
Subject: RE: Independent Environmental Audit - Westmead Hospital Campus – Integrated Mental Health Complex (SSD-44034342)

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL

Hi Barbara,

Thanks for your time on the phone this morning. As discussed, in relation to NSW Planning's request to consult with the EPA accredited site auditor in relation the management of contaminated areas on site, please focus on conditions relating to management of contaminated areas and, if you feel it necessary, interview the EPA accredited site auditor as part of the audit.

Please do not hesitate to contact me if you have any further questions.

Kind regards,

Alfarid Hussain

Compliance Officer
Development Assessment and Infrastructure
Department of Planning, Housing and Infrastructure

T 02 9274 6456 | M 0436 681 733 | E Alfarid.Hussain@planning.nsw.gov.au

dphi.nsw.gov.au

Locked Bag 5022|Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all Aboriginal and Torres Strait Islander staff working with the NSW Government.

Please consider the environment before printing this email.



From: Barbara Pater <Barbara.Pater@app.com.au>
Sent: Thursday, 9 May 2024 2:54 PM
To: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>
Cc: Thomas Minchin <Thomas.Minchin@planning.nsw.gov.au>; Elizabeth Williamson <Elizabeth.Williamson@planning.nsw.gov.au>
Subject: RE: Independent Environmental Audit - Westmead Hospital Campus – Integrated Mental Health Complex (SSD-44034342)

Received with thanks Alfarid, and acknowledging your requests. We will also ensure to reach out to the site auditor and council prior to the audit.

Please note there was an error with the date communicated – the audit will be undertaken over 22-23 May 2024.

Regards,

Barbara Pater
Exemplar Global Lead Environmental Auditor | Consultant – HSEQ Systems and Auditing



0415 764 785 | app.com.au
Gadigal Country | Level 14, 10 Spring Street, Sydney, NSW 2000



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From: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>
Sent: Thursday, May 9, 2024 11:41 AM
To: Barbara Pater <Barbara.Pater@app.com.au>
Cc: Thomas Minchin <Thomas.Minchin@planning.nsw.gov.au>; Elizabeth Williamson <Elizabeth.Williamson@planning.nsw.gov.au>
Subject: RE: Independent Environmental Audit - Westmead Hospital Campus – Integrated Mental Health Complex (SSD-44034342)

EXTERNAL

Hi Barbara,

Thanks for your email in relation to the initial independent environmental audit for the Westmead Hospital- Integrated Mental Health Complex approved under SSD-44034342 (**Consent**).

In addition to the requirements under conditions C41 and C44 of the Consent and the *Independent Audit Post-Approval Requirements* (2020), NSW Planning requests that a review of the adequacy of the CEMP and sub-plans and its implementation is undertaken, with a particular focus on the effectiveness of implementation of tree protection measures, noise management measures, complaints handling procedures and ERSED measures.

Additionally, please consult with the EPA accredited site auditor in relation the management of contaminated areas on site. Please also consult generally in relation to the project with the City of Parramatta.

If you have any further questions, please do not hesitate to contact me.

Kind regards,

Alfarid Hussain

Compliance Officer
Development Assessment and Infrastructure
Department of Planning, Housing and Infrastructure

T 02 9274 6456 | M 0436 681 733 | E Alfarid.Hussain@planning.nsw.gov.au

dphi.nsw.gov.au

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Please consider the environment before printing this email.

From: Barbara Pater <Barbara.Pater@app.com.au>
Sent: Wednesday, 8 May 2024 7:47 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Dylan Jones <Dylan.Jones@app.com.au>; Dimitra Rousounidou <dimitra.rousounidou@tsamgt.com>; Tim McNair <tim.mcnair@tsamgt.com>
Subject: Independent Environmental Audit - Westmead Hospital Campus – Integrated Mental Health Complex (SSD-44034342)

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the initial Independent Environmental Audit of the Integrated Mental Health Complex project located at Westmead, as a requirement of Consent Conditions SSD-44034342.

The audit will be conducted on the 20 May 2024 and will review compliance in accordance with SSD-44034342 Schedule 2: Parts A, B, C, Advisory Notes, and, if applicable, Incident Notification and Reporting.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements* (IAPAR 2020), Section 3.2, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of this audit.

Regards,

Barbara Pater

Exemplar Global Lead Environmental Auditor | Consultant – HSEQ Systems and Auditing



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APP Corporation Pty Limited, ABN 29 003 764 770.

Consultation with the NSW EPA-accredited Site Auditor:

Barbara Pater

From: Barbara Pater
Sent: Friday, 17 May 2024 4:06 PM
To: Melissa.Porter@senversa.com.au
Cc: Dylan Jones
Subject: Independent Environmental Audit - IMHC

Hi Melissa,

Further to my voicemail, just getting in touch as we'll be auditing the Integrated Mental Health Complex on the 22-23 May 2024.

I was hoping to include you as part of the audit on the 23rd where we have scheduled a focused review on site contamination, asbestos and remediation.

If you are free (and happy to) participate in the audit, we are planning to commence at 9.30am (for the site inspection), followed by an interview (around 11am) at the Westmead Hospital Campus (Roberts Co. site office).

There is also the option for a teams chat or phone discussion if you would prefer that instead. This can be undertaken separately to the audit days if required.

Please let me know so I can coordinate and make the necessary arrangements.

Regards,

Barbara Pater

Exemplar Global Lead Environmental Auditor | Consultant – HSEQ Systems and Auditing



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Consultation with the City of Parramatta:

Barbara Pater

From: Barbara Pater
Sent: Wednesday, 15 May 2024 5:46 PM
To: council@cityofparramatta.nsw.gov.au
Cc: Dimitra Rousounidou; Dylan Jones
Subject: Independent Environmental Audit - Westmead Hospital Campus – Integrated Mental Health Complex (SSD-44034342)

Categories: 2. Important/Note

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the initial Independent Environmental Audit of the Integrated Mental Health Complex project located at Westmead, as a requirement of Consent Conditions SSD-44034342.

The audit will be conducted on the 22-23 May 2024 and will review compliance in accordance with SSD-44034342 Schedule 2: Parts A, B, C, Advisory Notes, and, if applicable, Incident Notification and Reporting.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements (IAPAR 2020)*, Section 3.2, and at the request of the Department of Planning, Housing and Infrastructure, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Regards,

Barbara Pater

Exemplar Global Lead Environmental Auditor | Consultant – HSEQ Systems and Auditing



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Gadigal Country | Level 14, 10 Spring Street, Sydney, NSW 2000



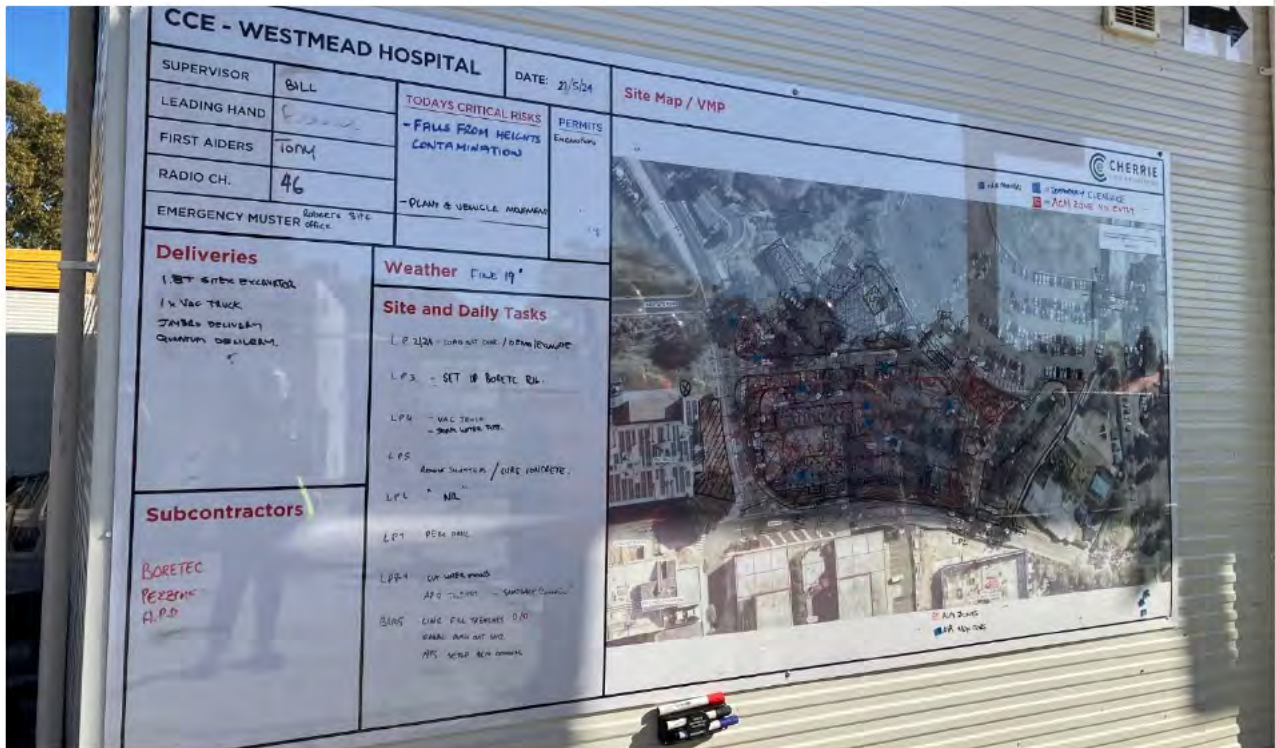
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APP Corporation Pty Limited. ABN 29 003 764 770.

Appendix G – Audit Photos

Audit Photos – 23 May 2024 IMHC

Audit Photos – 23 May 2024



Pre-start board shows marked up map with location of ACM zones in red and placement of air monitors in blue.



Waste bins onsite within capacity.

Audit Photos – 23 May 2024



Spill kits available throughout the site.



Plant parked in designated area. Decontamination shed in background.

Audit Photos – 23 May 2024



Asbestos areas are fenced with signage.



Protection of pit drain at main access road through site. Some sediment build up requiring clean up behind jersey barriers.

Audit Photos – 23 May 2024



Main access road into site. Hardstand in place to reduce mud tracking and dust.



Gate secured when not in use.

Audit Photos – 23 May 2024



Exclusion zone for contaminated areas.



Exclusion zone for contaminated areas.

Audit Photos – 23 May 2024



Workers observed in hazmat suits within asbestos exclusion zone.



Horizontal drilling in uncontaminated material for services installation.

Audit Photos – 23 May 2024

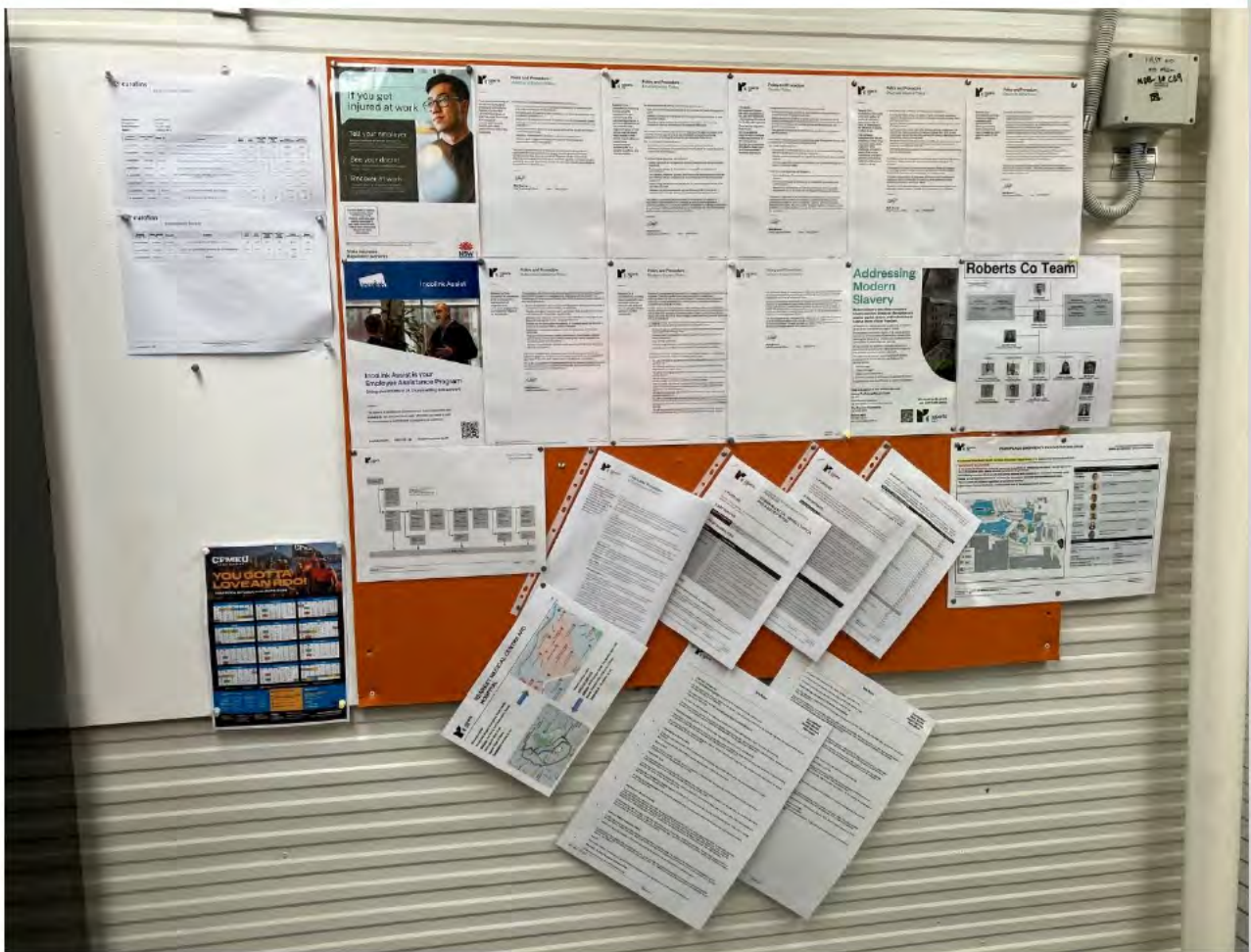


Orange geofabric being placed as a marker layer to identify residual contaminated material following backfill and capping.



Spare noise blankets available.

Audit Photos – 23 May 2024



Site Notice Board includes environmental policy and other key documentation.

Audit Photos – 23 May 2024



No controls in place at live drain, Redbank Road. Actioned during site inspection, refer below.



Protection of pit drain installed at Redbank Road during site inspection.

Audit Photos – 23 May 2024



Stockpile noted to be quite steep in parts, however this is being progressively reused onsite

Site Observations – 23 May 2024 IMHC

Site Observations – 23 May 2024



IMHC-SSD-01-OBS-01: Dedicated signage was not present for stockpiled materials. It is acknowledged that a stockpile tracker is in place, however there is an opportunity to install appropriate signage onsite to clearly indicate the material being stockpiled.



IMHC-SSD-01-OBS-02: The height of installed airborne asbestos monitors did not appear to be within breathing height range. It is recommended their placement be reviewed with the onsite hygienist.

Site Observations – 23 May 2024



IMHC-SSD-01-OBS-03: It was observed that asbestos removal / disturbance works were occurring only 1-2m from the exclusion zone boundary. It is recommended to reconsider the placement of exclusion zone boundaries with the onsite hygienist to ensure adequate distances are maintained.

Site Observations – 23 May 2024



IMHC-SSD-01-OBS-04: Truck was in the process of disposing dirty water which partially missed the sediment basin resulting in an overflow of sediment laden water. There is an opportunity for the procedure to be reviewed for disposal into the sediment basin, and a training / toolbox to be actioned to ensure workers are compliant with this process.



IMHC-SSD-01-OBS-05: Noise blankets were observed to be facing the wrong way on Redbank Road, with the absorbative surface facing outwards. There is an improvement opportunity to place the noise blankets the correct way to be fully effective for noise mitigation.



The APP Group

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