

Ken Cameron & Associates
Compliance and Assurance Services

Independent Audit Report
Wyong Hospital Expansion
Audit No. 3

SSD 9536

November 2020

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1 Executive Summary

This report details the process and findings of an audit conducted on Richard Crookes Constructions, who have been appointed as Head Contractor for the delivery of the Wyong Hospital Expansion Project on behalf of health Infrastructure.

On 29 August 2019, the NSW Department of Planning and Environment approved the State Significant Development application (SSD 9536) for construction and operation of the Wyong Hospital Redevelopment. The planning approval is the result of a thorough assessment of the proposal and its environmental impacts. Ken Cameron from Ken Cameron & Associates has been engaged to undertake independent audits of the Wyong Hospital Expansion Project. The audit has been conducted in accordance with the *Independent Audit Post Approval Requirements (DPIE 2018)*. The site audit was conducted on the 26 November 2020.

The prime objective of the audit was to confirm that the project is meeting the requirement of the SSD 9536 Conditions of the planning approval, and that the Environmental Management Plan requirements are being effectively implemented on the project with records that demonstrate compliance with the requirements of the Management Plans.

The audit determined that Richard Crookes Constructions (RCC) have generally maintained appropriate controls for the management of environmental requirements for the projects in accordance with the requirements of SSDA.

Key findings from this review process are as follows:

- SSD 9536 have generally been effectively addressed in the management plans and supporting documents, and could be demonstrated during the site audit
- All necessary submissions to the Certifying Authority have been made in accordance with the SSD requirements.
- Richard Crookes Constructions could demonstrate a clear understanding of the responsibility for the effective implementation of Environmental Management Plan systems on the project.
- Control systems on site are appropriate to achieve the stated environmental objectives

Controls observed on site and from a review of the provided documentation demonstrates an active commitment by RCC to the implementation of best practice in environmental control measures.

Of the 149 Consent Conditions that have been identified for this project, this audit determined that there were 75 compliant items, one non-compliant items and 73 not triggered items.

The non-compliant item concerns the placement of temporary construction spoil stockpile in and around the base of trees to be preserved in the southern area of the site, and this will need to be addressed by HI and RCC to be fully compliant with SSD 9536 Conditions. This issue is a repeat of a finding from the initial site audit in January 2020. RCC must remove the stockpiles, and to remind site personnel of the requirement for preservation of trees

It is also noted that Erosion and Sedimentation control devices are at the end of their storage capacity and require clean out and renewal. As there is no evidence of sedimented laden water travelling from the site to the surrounding water courses this has been raised as an Opportunity for Improvement.

Further Opportunities for Improvement were raised on the need to clarify how SSD requirements are to be met, or to confirm with HI that they will address the criteria as part of their pre-commencement activities

In summary, the key finding from the audit process is that Richard Crookes Constructions are generally complying with the requirements of SSD 9536 and the Construction Environmental Management Plan, with evidence of implementation of process as necessary for meeting the environmental objectives for the project.

Ken Cameron
Auditor

2 Introduction

2.1 Background

The NSW Government's Wyong Hospital Expansion is designed to provide an increase in overall service capacity with the development of a new services building. The new building will include:

- a new and expanded Emergency Department
- a new and expanded Intensive Care Unit
- a new Psychiatric Emergency Care Centre
- a new Paediatric Unit
- a new and expanded Medical Imaging Department
- a new and expanded Medical Assessment Unit
- additional inpatient beds with future expansion space

On 29 August 2019, the NSW Department of Planning and Environment approved the State Significant Development application (SSD 9536) for construction and operation of the Wyong Hospital Expansion. Main works construction of the new hospital building commenced in late 2019, with works are expected to be completed in early 2022.

Health Infrastructure NSW are the proponent of the new development, with the following key parties involved in the project:

Project Manager:	Colliers International
Project Architect:	HDR
Head Contractor:	Richard Crookes Constructions (RCC)
Principal Certifying Authority:	BM+G

As part of the SSD Conditions, the proponent is required to engage an Independent Auditor, with an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Planning Secretary and the Certifying Authority.

This report presents the findings of the initial independent audit of the Wyong Hospital Expansion Project

2.2 Audit Team

The audit was conducted by Ken Cameron, who is the principal of Ken Cameron & Associates Pty Ltd

2.3 Audit Objectives

The following are the Objectives for the conduct of the independent environmental audit:

- 1) Confirm that the project is the meeting the requirement of the SSD 9536 Conditions of the planning approval.
- 2) Confirm that the Environmental Management Plan requirements are being effectively implemented on the project with records that demonstrate compliance with the requirements of the Management Plans
- 3) Confirm the suitability and effective of the Environmental Management Plan, Construction Environmental Management Plan and associated sub-plans to minimise the impact of the development on the environment
- 4) Verify project compliance with the relevant national, local or other laws and regulations applicable to this development

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2.4 Audit scope

The scope of the audit was to:

- 1) Review the implementation of the Construction Environmental Management Plans and associated subplans for current activities on site
- 2) Review the environmental control processes being implemented for current site activities
- 3) Confirm compliance with the SSD 9536 conditions for the audit period

2.5 Audit period

The audit covers the period from the 24 June 2020 to the 26 November 2020.

3 Audit methodology

3.1 Selection and endorsement of the audit team

RCC nominated Ken Cameron to DPIE on the 28 October 2019, with DPIE providing agreement for Ken Cameron to conduct the Independent Environmental Audits on 31 October 2019

Ken Cameron is independent from the project and free from any actual, potential or perceived conflicts of interest. A written declaration of independence is to be found in Appendix C of this report

3.2 Independent audit scope development

The Independent Audit Program was submitted to Health Infrastructure on 26 November 2019, and was subsequently accepted by DPIE.

The Audit program has been posted on the project website.

Planning for this audit was conducted by way of emails between the auditor and RCC. RCC advised the Project Manager and HI of the conduct of the audit. No specific areas for review were identified prior to the conduct of the audit.

The audit was scheduled to be conducted over one day.

3.3 Compliance evaluation

3.3.1 Pre audit preparation

The Audit Table, to be found in Appendix A of this report was developed from the SSD 9536 approval. This used as the primary document for the review of the project.

Preparation for this audit included a review of the previous audit report, as well as an assessment of the Construction Compliance Report issued by RCC and provided prior to the conduct of the audit.

3.3.2 Conduct of the audit

The opening meeting was held at 09:00 on the 26 November 2020 with representatives of RCC in attendance. At this meeting the nature and scope of the audit was confirmed. A brief discussion was held with the RCC Project Director to discuss the status of the construction works.

Joel Coubrough was in attendance for the duration of the audit. The RCC WHS&E Advisor also sat in for the review of the CEMP, and provided assistance during the audit process. The audit identified a number of records which were provided by RCC on the day after the site audit.

A closing meeting was held at 14:00 on the 26 November 2020, with the key audit findings discussed.

One area of non-compliance was identified in the Closing Meeting (regarding tree protection) as well as a number of areas for improvement.

3.4 Site interviews

An Audit plan was issued to RCC prior to the audit, which set out the time frame for the conduct of the audit, as well as the key topic areas to be assessed. A summary of this plan is presented below:

09:00	Opening meeting	Confirmation of audit program Visitor Site Safety Induction
9:15	Site Inspection	Inspection of current work areas on site Review of site controls
10:30	Review of RCC	Status of EMP & CEMP

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	Environmental Management process	Project Organisation Monitoring of EMP implementation Follow up to previous audit findings
11:30	Review of CEMP and associated subplans	a) Construction Environmental Management Plan (CEMP) b) Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) c) Construction Noise and Vibration Management Sub-Plan d) Construction Waste Management Sub-Plan (CWMSP) e) Construction Soil and Water Management Plan (CSWMSP) f) Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) g) Biodiversity Management Sub-Plan (BMSP)
14:00	Review of Compliance table	Confirmation of objective evidence of compliance
		1. Review of Environmental licences and approvals 2. Review of Environmental Impact Assessment – actual vs prescribed: need predicted effects 3. Review of incidents, con-compliances and complaints
16:00	Auditor review	
16:30	Closing Meeting	

RCC were responsible for organising for relevant project personnel to be in attendance as required for the conduct of the audit

3.5 Site inspection

A site inspection was scheduled to be undertaken on the day of the audit. This included an inspection of the perimeter of the site, access gates, parking areas as well as the works areas. The RCC WHS&E Advisor attended the site inspection, together with the RCC Site Manager.

Photographs taken during this site inspection are to be found in Appendix D of this report.

3.6 Consultation

The opening meeting included a discussion on an areas of concern to be included in the audit process. No feedback was obtained from Health Infrastructure or Colliers, although RCC stated that they maintain a regular communication with the Wyong Hospital operational personnel, with no major issues of concern identified to be included in this audit process. No community feedback has been identified.

3.7 Compliance status descriptors

The following Compliance status descriptors have been used in compiling the Audit Table, which is to be found in Attachment A of this report:

Status	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.

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4 Audit Findings

4.1 Approval and document list

The following sets out the key compliance documents reviewed during this audit:

- SSD 9536 Notice of Assessment
- Crown Certificates CRO-20112 (CC3), dated 21 September 2020 - Certifier: Blackett Maguire + Goldsmith - David Blackett (Accreditation No BPB0032) – Note CC# was conditional subject to construction of DDA compliant ramp (not considered part of SSD 9536, covered by separate REF)
- Complaints register dated October 2020
- RCC Environmental Management Plan
- Construction Environmental Management Plan and associated sup-plans

Other documents reviewed in the conduct of this audit:

1. Project website <http://www.gwhr.health.nsw.gov.au/wyong-hospital-redevelopment>
2. Consultation with Fire Rescue NSW (Fire Brief Questionnaire) dated 7 July 2020
3. Statement dated 11 October 2020 confirming change in nominated supplier for sarking (same material specification)
4. Unexpected finds report - Asbestos Identification Report dated 08/10/2020 regarding contamination in material stockpile behind Nursing Home on adjacent land
5. Scope of works for asbestos material removal dated 08/10/2020
6. RCC instruction for deliveries to the project site (issued to all organisations transporting material to or from the construction site)
7. Environmental Audit Report dated 16 July 2020
8. Environmental Inspection Reports – 8 August, 14 August, 29 August, 25 November
9. Traffic Control Plan TCP 657 dated 18 October 2020 for revised access point at Louisiana Road
10. Waste register Summary – October 2020
11. Civil Infrastructure and Stormwater Design Certificate (CC3) dated 19 May 2020
12. Design Certificate for Mechanical Installation from LEHR Consultants International dated 3 August 2020
13. Bushfire Compliance Certification – Fire Trail from Travers bushfire and ecology dated 20 November 2020
14. Long Service Levy payment receipts
15. Record of Management Plan review dated July 2020
16. Environmental site inspection on the 20 November 2020
17. Evidence of daily use of Site Diary to record ongoing environmental compliance
18. Ausgrid design Certification dated 27 April 2020
19. Jemena correspondence 24 March 2020 regarding upgrade to supply
20. Waste Classification Report from ama dated 2 September 2020
21. Weekly Construction Meeting Minutes for November 9, 16 & 23
22. Vibration Management Report for July 2020

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4.2 Compliance performance

The following is the status of the SSD conditions for the project:

Compliant:	75
Non-compliant:	1
Not triggered:	73

The requirements as set out in the SSD have been effectively addressed by the Head contractor in the conduct of construction activities on site. All necessary submissions to the Certifying Authority have been made. A comprehensive set of environmental management planning documents have been developed in accordance with the SSDA.

Controls observed on site and from a review of the provided documentation demonstrates an ongoing commitment by RCC to the implementation of best practice in environmental control measures.

One area of non-compliance were observed during this audit regarding tree protection oi the southern cleared area.

4.3 Summary of agency notices, orders, penalty notices or prosecutions

RCC advised that there have been no agency notices, orders, penalty notices or prosecutions issued on the project since the commencement of construction

4.4 Non-compliances

RCC advised that there have been no incidents or environmental non-compliances identified since the commencement of construction.

4.5 Previous audit recommendations

The previous audit recommended that RCC renew the erosion and sedimentation control on the site. It was noted during this audit that these controls were nearing capacity, and require renewal

Other Suggestions for Improvement were effectively addressed

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4.6 EMP, Sub-plans and post approval documents

The following are the Environmental management system documents reviewed during this audit process

Plan	Revision
RCC Environmental Management Plan for the Wyong Hospital Expansion	Rev 03, dated 15/11/2019
Construction Environmental Management Plan	Rev 1, 22/11/2019
Community Consultation and Engagement Plan	Rev 2, 13/11/2019
Construction Traffic and Pedestrian Management Sub-plan (CTPMSP)	07/01/2020
Noise and Vibration Management Plan (NVMP)	Version 1, 24/10/2019
Construction Waste Management Plan (CWMSP)	10/10/2019
Construction Soil and water Management Plan (CSWMP)	08/11/2019
Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP)	07/10/2019
Biodiversity Management Plan	20/11/2019

Post approval documents reviewed during the audit process are identified in the Audit table to be found in Appendix A.

RCC presented evidence of the internal review of the Management Plans, with no requirement for change identified.

4.7 Environmental Management System

RCC have a corporate integrated management systems that addresses quality, WHS and environmental requirements. The system is certified to ISO 14001, and has been developed to address the management of environmental issues typically found in building works.

There is a strong Corporate influence over the operation of the management system, with monthly reports of key performance indicators and six monthly internal audits to assess the effectiveness of the system.

The Environmental Management Policy sets a target of 80% of waste to be recycled, with current site performance being 93% recycling.

The following is a commentary of the application of this system to the Wyong Hospital Expansion, with full details of compliance against SSD requirements to be found in the Audit Table included in Appendix A:

4.7.1 RCC Environmental Management Plan

The RCC Environmental Management Plan addresses the typical controls necessary for general building works.

Key objectives defined in the plan include:

- Minimise impacts on the community (none have been received)
- Reduce environmental impacts by addressing non effective environmental controls (no impacts observed since the previous audit)
- Zero EPA/Local Council clean up notices (nil received)
- 4 documented site walks per month (confirmed)

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An environmental actions and monitoring table is developed as part of the project start-up process, which identifies environmental impacts and the controls to be implemented to monitor their effectiveness. This remains unchanged at the time of this audit.

Current construction works have not required any additional supplementary environmental control procedures to be initiated. There has not been a requirement to implement the unexpected finds procedure was developed.

It was noted that the SSD Approval excludes the link bridge, which went through a separate REF process I was also noted that an additional DDA access was provided, again covered by a separate REF and this does not come under the SSD Approval.

There has been limited requirement for the Importation of material, with excess material from site works incorporated into the final landscaping plan for the works.

RCC rely on their sub-contractors to implement appropriate environmental controls, and will assess their environmental capabilities as part of the onboarding process to the project. Records of a site inspection on the 20 November 2020 presented as evidence of this process.

RCC have maintained their active process of environmental inspections to ensure the effectiveness of control measures on the site. The site diary is used to record performance against specific targets or actions as required for the project.

Community Consultation is through HI and their Project Manager. RCC have continued to take an active role in engaging with the community to ensure that they can react quickly to any potential concerns with the project. Regular visits are made to the key stakeholders to discuss project works and confirm no issues are present.

RCC advised there have been no environmental non-compliances identified at the time of this audit.

Management system controls defined the Environmental Management Plan reflect the ISO14001 requirements, and this is subject to site inspection and Head office audits of the management system.

4.7.2 Construction Environmental Management Plan

The CEMP has been developed by Travers Bushfire and Ecology in response to the SSD requirements. The CEMP is comprehensive, and outlines the controls required to minimise the impact of the environment.

The requirement for Flora and Fauna monitoring will be a function of completion of the landscaping works.

Control system outlined in the CEMP are described in detail in the various sub plans developed for the project, and address the Statutory requirements applicable to this project.

Environmental Management measures and controls identified in the plan may be considered appropriate.

There have been no discharges of water from the site boundary (due to the nature of the subsoil material).

Overall the CEMP can be considered appropriate for the Wyong Hospital Expansion project.

4.7.3 Community Consultation and Engagement Plan

This plan is a standard RCC deliverable for a project, and sets out the approach for a balanced community engagement process on the project.

Key stakeholders are identified, and the proposed consultation methods defined.

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All consultation is through HI, with RCC providing supporting (such as door knocking and letterbox drops) as required for the project). A log of interaction is not maintained as this is not a requirement of the contract

4.7.4 Construction Traffic and Pedestrian Management Sub-Plan

The CTPMSP has been developed by TTW, and addresses the requirements of the SSDA. The plan identifies the SSD conditions applicable to that aspect, and has been developed to ensure all requirements are effectively implemented on the project.

The Traffic Control Plan has been amended to reflect the revised site access from Louisiana Road. Traffic routes are identified, along with the process to be used to manage construction vehicles. A driver code of conduct has been developed. Detailed delivery instructions have been developed requiring all deliveries to be communicated prior to arrival, and vehicles are required to pull over at Warnervale Airfield and contact the site prior to arrival.

All deliveries have to be pre-booked prior to the vehicle arriving on site. A meeting is held at 15:00 each day with the sub-contractors to discuss traffic movements (and cranes) for the following day.

A representative of the subcontractor is required to meet the vehicle at Gate 1 and escort the vehicle on site. Failure to comply will result in the vehicle being sent away from site without unloading.

Traffic control measures identified in the CTPMSP were demonstrated on site. Gate One is the primary access point, with appropriate controls to ensure all vehicles enter and leave the site in a forward direction. There was no apparent impact on the community due to vehicle movements observed during the site inspection.

Monitoring of compliance is through the full time gateman engaged to control all vehicle movements.

4.7.5 Noise and Vibration Management Plan

The NVMP has been prepared by Greencap, who are the acoustic consultants for the project. The plan identifies the potential impact of the project, and identifies the control measures to be implemented to address these impacts.

Control measures nominated in the plan were observed during the site inspection. Real time noise and vibration monitoring was undertaken on site up until the completion of structural works, with exceedances reported to RCC (there were only minor exceedances (peaks) identified). Performance indicators are identified in the plan, and were reported on in Monthly reports. Noise and vibration monitoring was discontinued in August following the completion of structural works (last report is dated the 1 August 2020).

There have been no complaints since the commencement of site works.

4.7.6 Construction Waste Management Plan

RCC have provided their standard CWMP for this project, which outlines the operational controls to be implemented to achieve a minimum of 80% recycling on the project, as well as the method of recording to demonstrate achievement of this objective. Current performance is 93%.

The site is required to report on their waste minimisation activities on a monthly basis to the RCC Corporate Office.

The site induction includes discussion of the waste minimisation initiatives. The site inspection determined that there were appropriate recycling bins on site.

4.7.7 Construction Soil and Water Management Plan

The CSWMP has been prepared by TTW and identifies the control measures to be implemented on the site. The plan has been submitted to Council as part of the project planning process. An additional sedimentation pond was established at the commencement of site works due to the potential impact of construction scaffolding on the original controls. This scaffolding was eventually not required, with both ponds maintained.

Upstream of the works zone there is an existing carpark, with stormwater pipes being maintained through the construction zone to minimise the potential for ingress of water on to the site.

The CSWMP includes sizing of the sedimentation basin for a 1:5 rainfall event. Due to the nature of soils in the works area, there is a reliance on absorption of any overland flow on site, with bunds established to facilitate this process. Erosion and sedimentation controls have been installed on site, and at the property boundary, and were found to be in good working order during the site inspection, with no evidence of discharge of sediment laden water from the site boundary.

It was noted that there has been a continuation of the extreme rainfall, with 52 days lost to wet weather on the site. An inclement weather procedure has been included in the CSWMP.

Weekly inspection are undertaken on site to inspect the erosion and sedimentation controls, which are also inspected after each rainfall event.

It was noted during the site inspection that the erosion and sedimentation control measures are nearing their capacity, and require renewal. There is no evidence of the discharge of sediment beyond the site boundaries, so it has been raised as an Observation only.

4.7.8 Aboriginal Cultural Heritage Management Sub-Plan

The ACHMSP was prepared by McCardle Cultural Heritage P/L, and may be found on the project web site. The recommendations from Aboriginal Heritage Impact Assessment are reflected in the plan

The plan has been submitted and to the DPIE and Certifying Authority.

RCC stated that a site walk conducted after clearing in the asset prevention zone, with no identified finds.

4.7.9 Biodiversity Management Plan

The Biodiversity Management plan has been prepared by Travers Bushfire and Ecology, and provides a comprehensive summary of the affected habitat features, the process used to minimise removal of trees impacted by the works, and the subsequent management requirements to create and maintain the Asset protection Zone.

At the time of this audit, clearing of the APZ is complete, with a number of habitat trees maintained, and general modification of access tracks on site to minimise impact.

Site restoration activities have to commenced, with the original plans subject to redesign to make better use of the features of the site that were revealed by the removal of weeds as part of the initial site clearing operation. Excess material from site works has been incorporated into the landscape plan.

The audit noted that the stockpile areas to the south of the building site are not compliant with the recommendations of the Tree Assessment Report, and this requires action to preserve the affected trees.

4.8 Environmental performance

This audit determined that the environmental performance of the Wyong Hospital Expansion was in accordance with the planning guidelines and generally complies with the SSD requirements.

Control system observed during the site inspection were found to be compliant, although it was noted that car parking on site requires and ongoing oversight by RCC to minimise the impact of the hospital car park arrangements.

The following was noted:

- Traffic control system would appear to be effective in minimising impact on the surrounding roads
- Car parking initiatives have been implemented with a view to minimising the impact on the hospital carpark – this includes on site security to direct construction vehicles to not park in the staff and public parking areas adjacent to the site office
- There is no evidence of stormwater discharge from the site
- Vegetation removed through the clearing operations has been mulched and is being reused on site
- There have been no noise or vibration exceedances on site
- There have been no reported environmental incidents of non-compliances since the commencement of construction

Overall environmental performance of the development may be considered acceptable

4.9 Consultation outcomes

No areas were identified by key stakeholders prior to the conduct of the Independent Audit

4.10 Complaints

One complaint has been received on the project in the period since the previous Independent Audit (in June 2020), as outlined below:

Ref	Date	Nature of Complaint	How addressed	Status
08	24.01.20	Local resident queried development and whether the propose future entrance/ driveway off Louisiana Road was for the Public to access a six (6) storey carpark.	RCC advised local resident the driveway / Ambulance Road was proposed for the sole use of Ambulances to access the new Ambulance Bay & that there was to be no public access off of Louisiana Road and that the new Building under construction was not a multi-Level carpark but a Clinical Services Building	Resolved

4.11 Incidents

RCC advised that there have been no incidents identified since the commencement of construction on the project

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4.12 Actual versus predicted environmental impacts

The following was noted on the mitigation measures initiated for the construction phase activities in response to the impacts identified in the Environmental Impact Statement

Parameter	Impact	Mitigation measures implemented	Comment on effectiveness
Acoustic	Acoustic impacts during construction	Construction Noise and Vibration monitoring plan prepared Real time monitoring on site of noise and vibration, with RCC advised of exceedances Monitoring has been discontinued with the completion of structural building works	There has been one noise complaint due to high pressure washing of vehicle at Gate One. Process was modified There have been no other noise complaints.
Bushfire	Potential for bush fire at the site	Recommendation of the Bushfire Projection assessment to be implemented – establishing an asset protection zone and selection of cladding materials	Area has been cleared RCC have received acceptance to a proposed change in cladding material to reduce potential bushfire impacts
Air quality	Generation of dust during construction	Water spraying Covering of trucks entering or leaving site Management plans develop for times of high wind	Controls were observed to be appropriate during the site inspection RCC advised no dust complaints received
Soils and geotechnical	Exposure of contaminated material Soil erosion and sedimentation flowing from site	Hazardous finds procedure established Detailed Erosion and Sedimentation plans prepared and implemented on site	No hazardous material identified No evidence of discharge of sediment laden water from the site boundary
Contamination and remediation	Exposure of contamination during construction	Hazardous finds procedure established Existing contained stockpile of hazardous material from earlier works have been fenced and quarantined from the works area	No hazardous material identified Stockpiles on site classified as VENM
Traffic (General)	Increased traffic in the surrounding road network Increase in parking	Construction traffic and Pedestrian Management Plan established Dedicated truck routes communicated for all deliveries Additional Contractors car parking identified	No complaints received on traffic movement in and out of the site RCC have identified alternative parking areas, have security guard on site until 9AM directing contractors to park in identified areas

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Parameter	Impact	Mitigation measures implemented	Comment on effectiveness
Pedestrian movement	Difficulty for visitors to navigate around the site	Suitable wayfinding measures to be developed as part of final design activities	No impact on current pedestrian movement around the existing hospital site Provision made for movement of pedestrian around works zone on Louisiana Road adjacent to future site entry
Heritage	Archaeological impacts	No areas of state or local heritage impact were identified during the design phase Unexpected finds procedure established Conduct inspection of cleared areas	Areas in Asset protection zone underwent detailed inspection after initial clearing, with no heritage items identified
Tree removal	Loss of trees within the development site	Arborist report prepared Ecologist on site during tree removal	All identified trees preserved No fauna identified during tree removal operation Ongoing monitoring will be established as part of operational phase activities
Construction impacts	Traffic, Acoustic, vibration, dust, erosion	CEMP and associated subplans developed to address potential impacts	Control systems observed during this audit would appear appropriate No complaints received for construction phase activities to date
Waste	Unsafe & unsustainable management of waste	RCC have a companywide policy of waste minimisation with a target of 80% of waste to be recycled	151 Tonnes of waste removed in October, with 793 tonnes in total. RCC presented waste reports that show 93% of waste material has been recycled
Aviation	Crane operation may impact on helicopter access and nearby Warnervale Airport	Aviation report prepared and implemented Liaison with hospital on preferred flight route for access to Helicopter landing site Helicopter Management Plan prepared	Hospital will notify RCC when helicopter will be in use Crane use protocols established

4.13 Site Inspection

A site inspection was undertaken on the 26 November 2020. This included an inspection of the perimeter of the site, access gates, parking areas as well as the works areas.

The RCC WHS&E Advisor attended the site inspection, together with the RCC Site Manager.

The following was noted during the site inspection

- Provision has been made for parking on site as described in the CTPMSP, although due to current construction activities it is at capacity
- RCC have identified alternative parking areas, have employed a security guard to direct contractors to offsite parking areas – parking is also a recurring discussion point in weekly meetings with the subcontractors
- Signage is provided at all entrances to site
- Appropriate measures for minimising material falling onto roadway when vehicles exit the site
- Erosion and sedimentation control measures installed at site boundary, although it was noted that they are nearing capacity and require renewal
- Mulch stockpiles on site from clearing operations are being reused in the Hospital precinct
- There is evidence of the preservation of trees in the asset protection zone, however stockpiles were identified around the tree drip zone, with Non-compliance raised
- Road pavement placed on all access roads, will minimise the amount of material potentially tracked off site
- Appropriate provision for clean out of waste from concrete pumps
- Appropriate waste recycling facilities on site
- Permanent drainage installed on access roads, but has yet to be connected to the local stormwater system

Photographs taken during this site inspection are to be found in Appendix D of this report.

4.14 Site interviews

The opening meeting was held at 10:15 on the 26 November with representatives of RCC in attendance. At this initial meeting the nature and scope of the audit was confirmed. A brief discussion was held with the RCC Project Manager to discuss the nature of the audit process. The following personnel were interviewed during the audit process:

Name	Organisation	Role
Simon Karkkainen	RCC	Project Manager
Dane Lalic	RCC	Site Manager
Joel Coubrough	RCC	Project Engineer
Ryan	RCC	WHS&E Advisor

Joel Coubrough was in attendance for the duration of the audit. The RCC WHS&E Advisor also sat in for the initial review of the CEMP, and provided assistance during the audit process.

A closing meeting was held at 14:00 on the same day, with the key audit findings discussed

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4.15 Action taken to address findings and recommendations from previous audit

Identified Non-compliance – nil

Opportunities for Improvement

Ref	Opportunity for Improvement	Action taken	Status
OFI-01	RCC should review and renew sedimentation control measures on the site, including protection of existing stormwater systems as well as perimeter control fencing	Site inspection determined that control measures have not been maintained sufficiently – need cleaning	Open
OFI-02	RCC should conduct a review of their Environmental Actions and Monitoring Table in the CEMP to confirm that identified controls are appropriate for the current stage of the project	Review undertaken in June	Closed
OFI-03	RCC should review the parking arrangements for the site – due to the impact of Covid-19 the majority of site personnel will drive their own vehicle, with minimal use of public transport of carpooling. RCC may need to identify alternative areas for parking so as to not impact on hospital operations	Additional parking developed for exclusive use of Wyong Hospital Staff. RCC have obtained additional 24 spots in adjacent medical centre, will monitor parking arrangement in the morning, have identified overflow zone and will direct Contractors to this as required	Closed
OFI-04	RCCC should ensure that they conduct a review of the EMP/CEMP within three months of the submission of the Compliance Report. SSD Condition A29 refers to review to be undertaken with three months of a submission of a Compliance Report under B29 of the SSDA	Presented evidence of review – letter submitted dated 10 July 2020, notes Compliance report submitted On 13/05/2020	Closed

4.16 Key strengths

The following key strengths were noted during this audit:

- RCC have implemented the key requirements of the project plans developed in response to the SSD
- There is a continuing active involvement in the site team for effective implementation of environmental controls, as is exemplified by the development of site access controls for deliveries
- RCC continue to modify process on site to enhance their environmental performance
- senior management have oversight of the environmental controls being implemented on the project

5 Recommendations

5.1 Non-compliances

One non-compliances were identified during the audit process, as defined below:

Ref	SSD ID	Compliance Requirement	Details of noncompliance <i>Recommended action to address</i>	Date
NC01	A22	<p>Tree Protection</p> <p>For the duration of the construction works:</p> <p>(c) all trees on the site that are not approved for removal must be suitably protected during construction as per recommendations of the Tree Assessment Report prepared by Travers Bushfire & Ecology dated November 2018; and</p> <p>(d) 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>	<p>The stockpile areas to the south of the building site are not compliant with the recommendations of the Tree Assessment Report</p> <p><i>RCC should:</i></p> <ol style="list-style-type: none"> 1) remove spoil for around tree protection zones 2) Undertake remedial works to repair root zones 3) toolbox supervisors and workers on her requirement for protection of trees <p>It is noted that this is a recurrence of an issue was identified in the first Independent Site Audit</p>	26/11/20

5.2 Opportunities for improvement

Following opportunities for improvement were identified during the audit process:

- OFI-01 ERSED controls would appear appropriate for the site, although it was noted that there is a need to renew controls in some areas (while still effective, they are reaching the end of their serviceable limits to prevent sediment laden run off)
- OFI-02 RCC should identify the SSD conditions nominated in Part D and E of SSD 9536 Conditions that will be the responsibility of Health Infrastructure to resolve. Examples include the development of the Green Travel Plan and the Operational Waste Management Plan to be prepared prior to commencement of operations. These items should be identified and discussed during the completions process for the project to ensure that they are addressed prior to the commencement of the operation of the facility
- OFI-03 RCC should confirm whether an Operation and Maintenance Plan (OMP) is required for the stormwater quality measures for the site, as defined by SSD Condition D15. It is noted that the only measures will be swales for and detention ponds for the infiltration of stormwater runoff, with no control devices requiring maintenance having been identified.

6 Conclusion

An audit was conducted on Richard Crookes Constructions, who have been appointed as Head Contractor for the delivery of the Wyong Hospital Expansion Project on behalf of health Infrastructure.

The audit confirmed that the project is meeting the requirement of the SSD 9536 Conditions of the planning approval, and that the Environmental Management Plan requirements are being effectively implemented on the project with records that demonstrate compliance with the requirements of the Management Plans.

Controls observed on site and from a review of the provided documentation demonstrates an active commitment by RCC to the implementation of best practice in environmental control measures.

There was one area of non-compliance identified through the audit process regarding the provision of tree protection in the area of the Asset Protection Zone to the south of the building site, where temporary stockpiles of material have been placed in and around the base of trees. This is a recurring issue which requires RCC to remove this material and restore the protection zone around the affected trees (which are to be preserved). There is also a need to provide information to the RCC supervisors and relevant sub-contractors on the need to preserve clear areas around the trees to be preserved

Key area for improvement is in the renewal of erosion and sedimentation control measures on site.

There is also the need for RCC and HI to agree the SSD 9536 approval conditions as defined by Part D and Part E that will need to be addressed by Health Infrastructure

In summary, the key finding from the audit process is that Richard Crookes Constructions are generally complying with the requirements of SSD 9536 and the Construction Environmental Management Plan, with evidence of implementation of process as necessary for meeting the environmental objectives for the project.

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7 Appendices

Appendix A – Independent Audit Table

Appendix B – Planning Secretary Audit Team Agreement

Appendix C – Independent Audit Declaration Form

Appendix D – Site Inspection Photographs

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Appendix A: Independent Audit Table

Refer separate Excel spreadsheet *SSD 9536 Independent Audit Table*

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Appendix B: Planning Secretary Audit Team Agreement



Health Infrastructure
ATTN: Ms Leone McEntee
Manager, Planning
Level 14, 77 Pacific Highway
NORTH SYDNEY NSW 2060

Contact: Emmanuel Smith-Aspros
Phone: 02 8275 1232
Email: compliance@planning.nsw.gov.au

BY EMAIL ONLY: Leone.McEntee@health.nsw.gov.au

Dear Ms Leone McEntee

Agreement of Independent Auditor Wyong Hospital Expansion (SSD 9536)

Reference is made to the submission, dated 28 October 2019, seeking the agreement of the Secretary of the Department of Planning, Industry & Environment (the Department) of a suitability qualified, experienced and independent auditor to undertake independent audits of the Wyong Hospital Expansion project.

In accordance with Condition C31, Part C and the *Independent Audit Post Approvals Requirements* (Department 2018), the Secretary has agreed to the following auditor: Mr Ken Cameron.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (Department 2018). Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor for future audits.

Notwithstanding, the agreement for the above listed auditor for this Project, each respective project approval requires a request for the agreement to the auditor be submitted to the Department, for the consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor will be considered.

If you have any questions, please contact Emmanuel Smith-Aspros on the details listed above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kate Moore'.

Kate Moore *21/10/2019*
A/Principal Compliance Officer (Social Infrastructure)
As nominee of the Secretary

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Appendix C: Independent Audit Declaration Form

Project Name	Wyong Hospital Expansion
Consent Number	SSD 9536
Description of Project	Construction and operation of the Wyong Hospital Expansion.
Project Address	Wyong Hospital, Henry Moore Dr, Hamlyn Terrace NSW
Proponent	Health Infrastructure
Title of Audit	Independent Audit for Wyong Hospital Expansion – January 2020
Date	30 November 2020

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:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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 audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- 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
- 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 Auditor	Ken Cameron
Signature	
Qualification	BE, MBA, Qualified Lead Auditor
Company	Ken Cameron & Associates Pty Ltd
Company Address	31 The Boulevard Lewisham NSW 2049

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Appendix D: Photos from site inspection



Photo1: View of car parking – at capacity

Photo 2: area adjacent to ambulance station – no signs of runoff



Photo 3: Area requiring controls to be installed

Photo 4: Stockpiles in and around trees

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 5: Showing stockpile area being restored



Photo 6: Lay down area



Photo 7: Area adjacent to access road – ERSER controls need cleaning



Photo 8: Controls around drainage pipes

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 9: Main construction access to site



Photo 10: Controls adjacent to water course – need cleanout



Photo 11: Lay down area adjacent to roadway



Photo 12: Gate 1 – main site construction access

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 13: Controls adjacent to water course – need cleanout



Photo 14: Loussiana Street at Gate 1



Photo 15: Nesting box established in southern area



Photo 16: Waste recycling and telehandler

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 17: View to main building from Ambulance Road



Photo 18: View to gate 1



Photo 19: ERSED controls require renewal



Photo 20: Fire trail in background, drain to sedimentation pond

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 21: Fire access path



Photo 22: Area south of fire access trail



Photo 23: Stockpile of material around tree to be preserved



Photo 24: Material storage – ERSED fence installed

Wyong Hospital Expansion – SSD 9536 Construction Compliance Audit No.2



Photo 25: Cladding installation on link bridge



Photo 26: East face of new building



Photo 27: Material storage



Photo 28: Construction of new access ramp