



Health
Infrastructure

Proponent Response to Independent Audit Findings Coffs Harbour Hospital Expansion

State Significant Development (SSD) 8981

PWC

[VERSION 1.0]

6 June 2022

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Introduction

Project Name and Project Application Number

Coffs Harbour Hospital Expansion – SSD 8981

Site Address

Lot 205 DP 1206854 and Lot 14 DP 261222

345 Pacific Highway Coffs Harbour NSW 2450

Title and Revision Number

Proponent Response to Independent Audit Findings Version 1

Date

6 June 2022

Contact Details

Proponent	Health Infrastructure
Client Representative	PwC
Managing Contractor	Hansen Yuncken

Independent Audit Date

23 May 2022 (Operational)

24 May 2022 (Refurbishment)

Independent Auditor

AQUAS

Proponent Response

The table below details the Conditions of Consent that were classified as “Non-compliant” with a recommendation by the Independent Auditor during the Independent Audit conducted on 23 & 24 May 2022. As required the proponent has provided a detailed action plan to be undertaken in response to each non-compliance, refer table 1 on the next page.

Condition No.	Requirement	Audit Findings	Independent Auditor Comments / recommended Actions	Proponent Response / Timing
A2	<u>A2 Terms of Consent</u> The development may only be carried out: A2 (a) in compliance with the conditions of this consent.	Non-Compliant	Non-Compliance NC-01: Based on the number of non-compliant conditions identified during this audit condition A2 is non-compliant. Recommendation: By addressing the non-compliances on conditions B2 and B4 this condition will also be addressed.	DPIE to be notified of the non-conformance. Non-compliances addressed as per the below.
D1	<u>D1: Notification of Occupation</u> The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Written notification of Hospital Occupation was not submitted to DPE at least one month before occupation of the Clinical Services Building.	The proponent needs to improve on the administrative requirements specifically notification timeframes as required by DPE.	DPIE to be notified of the non-conformance. To meet the requirements of this condition for future stages, notification has been made to DPIE in advance of the operation commencement of future stages. The Staging Report, previously submitted to DPE, indicated the following completion dates: <ul style="list-style-type: none"> - CSB (Operational): Q4 2021 - CSSD: Q2 2021 - EMU & ED: Q2 2022 - Periop: Q2 2022 - Ambulatory Care, Admin Stage 2, On-Call, Pathology & external works: Q4 2022
E3	<u>E3: Operational Noise Limits</u> A noise verification report must be submitted to the EPA and the Department within three months of the occupation of the development. The report must be prepared by a suitably qualified and experienced acoustic consultant.	Noise verification report was not carried out of the Mechanical Plant of the Clinical Services Building nor submitted to EPA and the DPE within three months of the Hospital occupation.	Noise verification report to be carried out of the Mechanical Plant of the Clinical Services Building by a suitable qualified and experienced acoustic consultant. Report to be submitted to EPA and DPE.	DPIE to be notified of the non-conformance. CPB agree that this has been missed and have committed undertaking this monitoring by the end of July 2022.
E4	<u>E4: Operational Noise Limits</u> The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the report titled Coffs	Noise monitoring was not carried out of the Mechanical Plant of the Clinical Services Building and results to	Noise monitoring was to be carried out of the Mechanical Plant of the Clinical Services Building and results to be analysed to ensure they do not exceed the noise limits.	CPB agree that this has been missed and have committed undertaking this monitoring by the end of July 2022.

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	Harbour Hospital Expansion Construction and Operational Noise and Vibration Assessment Report, prepared by Arup, dated 4 June 2018.	be analysed to ensure they do not exceed the noise limits.		
E5	<p><u>E5: Operational Noise Limits</u> The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry (EPA, 2017). The monitoring program must be carried out by an appropriately qualified person a monitoring report must be submitted to the Planning Secretary within two months of commencement of operation to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Acoustic Report. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.</p>	<p>The short-term operational noise monitoring and the program were not carried out in accordance with the requirement of condition E5 by an appropriately qualified person of the relevant Mechanical Plant of the Clinical Services Building. Monitoring report not submitted to DPE.</p>	<p>The short-term operational noise monitoring and the program are to be carried out in accordance with the requirement of condition E5 by an appropriately qualified person of the relevant Mechanical Plant of the Clinical Services Building. Monitoring report to be submitted to DPE.</p> <p>Actions for any exceedances found must be undertaken in accordance with this condition.</p>	<p>CPB agree that this has been missed and have committed undertaking this monitoring by the end of July 2022.</p>
E6	<p><u>E6: Operational Noise Limits</u> The Applicant must ensure that noise emissions during operation of the helipad complies with the Air Navigation (Aircraft Noise) Regulations 2018.</p>	<p>Operational noise monitoring was not carried out during the Helipad operations to verify noise emissions comply with the Air Navigation Regulations 2018.</p>	<p>Operational noise monitoring to be carried out during the Helipad operations to verify noise emissions comply with the Air Navigation Regulations 2018.</p>	<p>The following comment is provided by our consultant “The NSW Government addresses helicopter noise under the Protection of the Environment Operations Act 1997. On the EPA website at Regulating noise (nsw.gov.au) the EPA states that: “Aircraft noise is regulated by the Australian Government, except for aircraft maintenance at privately operated or council-operated airports.” Further, Schedule 1 of the Act describes licenced premises and under Clause 20 of the Schedule, it does not apply to development</p>

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				<p>for “emergency aeromedical evacuation, retrieval or rescue”. It also doesn’t apply to activities with an intended use of less than 30 flights per week.”</p> <p>Further detail is provided in the attached. It is recommended this condition be treated as not applicable or a modification is sought to delete the condition.</p>
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REFURBISHMENT:

Condition No.	Requirement	Audit Findings	Independent Auditor Comments / recommended Actions	Proponent Response / Timing
A2	<p><u>A2 Terms of Consent</u> The development may only be carried out: A2 (a) in compliance with the conditions of this consent.</p>	Non-Compliant	<p>Non-Compliance NC-01: Based on the number of non-compliant conditions identified during this audit condition A2 is non-compliant.</p> <p>Recommendation: By addressing the non-compliances on conditions B2 and B4 this condition will also be addressed.</p>	<p>DPIE to be notified of the non-conformance. Non-compliances addressed as per the below.</p>
C44	<p>C44: Independent Environmental Audit In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: b) submit the response to the Department and the Certifying Authority</p>	Response to the Independent Audit Report was not submitted to the Certifying Authority as per condition C44 (b).	Response to the Independent Audit Report to be submitted to the Certifying Authority.	Response has now been issued to the Certifying Authority.

