



**Health**  
Infrastructure

# **Proponent Response to Independent Audit Findings Coffs Harbour Hospital Expansion**

**State Significant Development (SSD) 8981**

**PWC**

[VERSION 1.0]  
30 January 2020

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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

20/01/2020

### Contact Details

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

### Independent Audit Date

13 September 2019

### 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 13 September 2019. 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.

A modification was required to recognise that conditions can be satisfied progressively during construction. Consultation as to the format of the staging report with the Department of Planning, Industry and Environment is ongoing

Condition No.	Requirement	Audit Findings	Independent Auditor Comments / recommended Actions	Proponent Response / Timing
A2	A2 Terms of Consent 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: CPB to address all the non-compliants noted during this audit to fully comply with this condition.	Non-compliances addressed as per the below.  Review of the CEMP by project team to update where appropriate.
A17	Design and Construction for Bush Fire Prior to the commencement of construction, the Applicant must design the development in accordance with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 Construction of buildings in bushfire-prone areas or NASH Standard (1 July 2014 updated) National Standard steel Framed Construction in Bushfire Areas - 2014 as appropriate and section A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006 to the satisfaction of the Certifying Authority.	Non-Compliant	Non-compliance NC-02: The design for bush fire was part of the Crown Certificate 3 and was not completed prior to commencement of construction.  Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timelines.	Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.
A22	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (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 approved strategies, plans and programs required under the conditions of this consent;  (iv) regular reporting on the environmental performance of the development in accordance with	Non-Compliant	Non-compliance NC-03: Not all information or documents required by this condition have been uploaded in a public website i.e.: - CEMP and subplans - Performance report - Monitoring results - Complaints register  Recommendation: It is recommended that the Contractor post all the required information on the project website.	The project has provided access to documents at: <a href="https://mnclhd.health.nsw.gov.au/hospitals/mnclhd-major-capital-works/coffs-harbour-health-campus-expansion/ssd-approval-coffs-harbour-health-campus-expansion/">https://mnclhd.health.nsw.gov.au/hospitals/mnclhd-major-capital-works/coffs-harbour-health-campus-expansion/ssd-approval-coffs-harbour-health-campus-expansion/</a>  Complainsts Register has been uploaded.  Monitring Results and Performance Report will be uploaded by 13 Feb 2020

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	<p>the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> <p>(vi) a summary of the current stage and progress of the development;</p> <p>(vii) contact details to enquire about the development or to make a complaint;</p> <p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>{x) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>			
<b>B1</b>	<p><b>Notification of Commencement</b></p> <p>The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates.</p>	Non-Compliant	<p>Non-compliant NC-04: Notification of construction work to DPIE was not provided within 48 hours of commencement of work. Construction works commenced 19 June 2019. Email from HI to DPIE on the 16/7/19 indicating that construction works commenced on the 19/6/19. Recommendation: CPB and HI must notify DPIE at least 48 hours before commencement of operation.</p>	<p>HI and the contractor have reviewed the requirements of SSD 8981 to ensure that everyone understands the definition of each requirement to ensure compliance, specifically if this involves timing.</p>
<b>B3</b>	<p><b>Certified Drawings</b></p> <p>Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifying Authority structural drawings prepared and signed by a suitably qualified</p>	Non-Compliant	<p>Non-compliant NC-05: Not all the structural drawings have been submitted to CA prior to commencement of construction (19 June 2019). It was noted that the piling</p>	<p>Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.</p>

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	practising Structural Engineer that demonstrates compliance with:		works were submitted to CA on 27 June 2019.  Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timeline.	
<b>B06</b>	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	Non-Compliant	Non-compliant NC-06: CEMP Rev.3 was approved by Certifier (Blackett Maguire + Goldsmith) on the 26/6/19 Transmittal No. BM+G-GCOR-000239. CEMP was sent on the 26/6/19 to PwC, Transmittal No. CPB Con-TRANSMIT-000464. CEMP Revision 4 was submitted to CA and HI on 17 September 2019. However, there was no evidence sighted that CEMP was submitted to DPIE within 7 days after Certifying Body accepted it.  Recommendation: CPB and HI to ensure that CEMP will be submitted to DPIE within 7 days upon Certifying Authority approval.	Noted. CEMP provide to DPIE by HI via email on 24 September 2019  HI and the contractor have reviewed the requirements of SSD 8981 to ensure that everyone understands the definition of each requirement to ensure compliance, specifically if this involves timing.
<b>B19</b>	External Walls and Cladding  Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	Non-Compliant	Non-compliant NC-07: The external walls and cladding design will be part of the Crown Certificate 2 and this was not provided to Certifying Authority prior to commencement of construction.  Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on	Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.

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			the Crown Certificates timeline.	
<b>B26</b>	<p>B26: Stormwater Management System</p> <p>Prior to the commencement of construction, the Applicant must design and install a stormwater management system for the development. The system must:</p>	Non-Compliant	<p>Non-compliant NC-08: The design for stormwater management system was not submitted to CA prior commencement of construction (19/6/19). It was provided on 25 July 2019 and comments from CA was yet to be addressed. CPB was waiting for the ecologist report with respect to the compliant with B26.</p> <p>It was also noted that the designed by Taylor Thomson Whitting (NSW) Pty Ltd (TTW) was submitted for consultation. Coffs Harbour Council was contacted by TTW via email on 2/7/2019 sending all the design for review. Council responded with comments on 10/07/2019, TTW was yet to address Council comments.</p> <p>Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timeline.</p>	<p>Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.</p>
<b>B27</b>	<p>Rainwater Harvesting</p> <p>Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.</p>	Non-Compliant	<p>Non-compliant NC-09: The rainwater harvesting plan was not yet developed prior to commencement of construction. It will be part of the CC2.</p> <p>Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying</p>	<p>Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.</p>

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			Authority approvals based on the Crown Certificates timeline.	
<b>B28</b>	<p><b>B28:</b> Operational Noise - Design of Mechanical Plant and Equipment Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the report titled Coffs Harbour Hospital Expansion SSD 8981 Construction and Operational Noise and Vibration Assessment Report, prepared by Arup, dated 4 June 2018, into the detailed design drawings.</p> <p>The Certifying Authority must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the report titled Coffs Harbour Hospital Expansion SSD 8981 Construction and Operational Noise and Vibration Assessment Report, prepared by Arup, dated 4 June 2018.</p>	Non-Compliant	<p>Non-compliant NC-10: Not completed prior commencement of construction as this will be part of the CC2.</p> <p>Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timeline.</p>	Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.
<b>B30</b>	<p><b>B30</b> 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 Certifying Authority 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.</p>	Non-Compliant	<p>Non-compliant NC-11: The access for people with disabilities design was not provided to Certifying Authority prior to commencement of construction.</p> <p>However, it was noted that Disable Access &amp; Egress- OC Access Installation Certificate - Early Works was developed dated 10 July 2019 as part of building to be certified - Early works- car parking and associated pathways by iaccess Consultants Certifier: Richard Seidman (M PropDev, Diploma in Access ARB Reg No 4829, Accredited Access Consultant No 330,</p>	Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.



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			<p>Livable Housing Register Assessor 10041). Documentation was provided to BCA on 25/7/2019. Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timeline.</p>	
<b>B31</b>	<p>Car Parking and Service Vehicle Layout Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction: B31 (a) all vehicles must enter and leave the site in a forward direction; B31 (b) minimum of 1,133 on-site car parking spaces for use during operation of the development and designed in accordance with the latest version of AS2890.1;</p>	Non-Compliant	<p>Non-compliant NC-12: The car parking and service vehicle layout was not provided to Certifying Authority prior to commencement of construction and it was noted that the design only allows for 1128 car parking spaces which is less than 1,133 on-site car parking spaces. Recommendation: Revision of the design to comply with the minimum car parking spaces and to submit the updated design for CA approval.</p>	<p>Final design will have required amount of car spaces. Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is progressively achieved.</p>
<b>B32</b>	<p>Bicycle Parking and End-of-Trip Facilities Compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p>	Non-Compliant	<p>Non-compliant NC-13: This was not completed prior to commencement of construction and is part of CC2 submission. Recommendation: A Staging Report is recommended to be developed and submitted to DPIE for approval to align the condition with Certifying Authority approvals based on the Crown Certificates timeline.</p>	<p>Staging report has been submitted to DPIE following approval to modify consent. The commencement of construction relevant to the Stage of this Condition is therefore not triggered.</p>
<b>B34</b>	<p>Protection of Public Infrastructure Before the commencement of construction, the Applicant must:</p>	Non-Compliant	<p>Non-compliant NC-14: The dilapidation reports were not submitted to DPIE and Council prior to</p>	<p>HI and the contractor have reviewed the requirements of SSD 8981 to ensure that everyone understands the definition of each requirement to</p>

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	<p>B34 (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to diversion, protection and support of the affected infrastructure;</p> <p>B34 (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>B34 (c) submit a copy of the dilapidation report to the Planning Secretary, Certifying Authority and Council.</p>		<p>commencement of construction. They were provided to CA on 12/7/2019. Submitted to Council 30/07/2019 and sent to HI on 9/07/2019.</p> <p>Recommendation:</p> <p>The documents required by this consent must be provided to the relevant stakeholders and DPIE within the timeframe.</p>	<p>ensure compliance, specifically if this involves timing.</p>
<b>C38</b>	<p>Incident Notification, Reporting and Response and Appendix 1 (1)</p> <p>The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> 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.</p> <p>Subsequent notification must be given, and reports submitted in accordance with the requirements set out In Appendix 1.</p>	<p>Non-Compliant</p>	<p>Non-compliant NC-15:</p> <p>Evidence of notification to DPIE on incidents reported were not provided.</p> <p>It was noted that there were two (2) notifiable incident recorded on site to date. Which were the following:</p> <ol style="list-style-type: none"> <li>1. Incident report was presented dated 13/7/19. Incident was that a gas main service was struck.</li> <li>2. Incident Report 191004 – that the bio-retention basin for the new western carpark was encroached into previously cleared mapped coastal wetland area to the south west of the western car park.</li> </ol> <p>Recommendation: Notification and complete incident report to be submitted to DPIE. Records for reporting to DPIE must be kept.</p>	<p>HI and the contractor have reviewed the requirements of SSD 8981 to ensure that everyone understands the definition of each requirement to ensure compliance, specifically if this involves timing.</p> <p>The bioretention pond was initially reported on the 6 September 2019 and the incident reported on the 4 October within project timeframes.</p> <p>The gas main strike has been reported to DPIE on 24 Jan 2020.</p>
<b>C38</b>	<p>Appendix 1 (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</p>	<p>Non-Compliant</p>	<p>Non-compliant NC-16:</p> <p>There was no evidence available to indicate that incident reports were provided to DPIE within 30 days of the date which incidents occurred for the gas main strike.</p>	<p>HI and the contractor have reviewed the requirements of SSD 8981 to ensure that everyone understands the definition of each requirement to ensure compliance, specifically if this involves timing.</p>

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	addressing all requirements below, and such further reports as may be requested.		Detailed reports for the 2 incidents were provided by CPB to PwC. Recommendation: Submit the incident reports within 30 days from the date which the incident occurred.	
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