



**Table 1 Response to Randwick City Council draft conditions**

Matter	Draft Condition	Project Response
<b>REQUIREMENTS BEFORE A CONSTRUCTION CERTIFICATE CAN BE ISSUED</b>		
Integrated Transport Working Group	1. An Integrated Transport Working Group should be established between Health Infrastructure, UNSW and Council to ensure the adequate transport planning for the overall masterplan of the Randwick Hospital Campus, including integration of east-west and north-south bicycle and pedestrian routes, parking and green travel plan requirements. Evidence of the formulation of this working group should be provided prior to the issue of a construction certificate.	<p>Health Infrastructure (HI) is opposed to the creation of a formal Integrated Transport Working Group as part of SSD-10831778. The formation of an Integrated Transport Working Group related to precinct wide matters is beyond the scope of the SCH1/CCCC and the adjacent UNSW HTH project.</p> <p>Whilst HI supports close collaboration with Randwick City Council (RCC), the matters which RCC has identified for resolution by an Integrated Transport Working Group have been considered as part of the development and outlined within the SCH1/CCCC Response to Submissions (RTS). HI has a close working relationship with RCC and meets with RCC regularly to discuss issues relating to the Randwick Campus Redevelopment. Discussions concerning transport and access matters can form part of these conversations as required, without the need to create a formal Integrated Transport Working Group as part of the SCH1/CCCC project.</p> <p>Additionally, we note that there was no requirement to establish an Integrated Transport Working Group under the Prince of Wales Hospital Expansion Stage 1 (SSD-</p>

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		9113) - it should not be imposed on the SCH1/CCCC or the adjacent UNSW HTH development.
Contamination	<p>2. The land must be remediated to meet the relevant criteria in the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999 (as amended 2013) and the following requirements must be complied with:</p> <p>a) The remediation works shall be carried out in accordance with the requirements of the Contaminated Land Management Act 1997, environmental planning instruments applying to the site, guidelines made by the NSW Environment Protection Authority (EPA) and NSW Planning &amp; Environment and the Protection of the Environment Operations Act 1997.</p>	It is suggested that DPIE adopt their standard conditions concerning contamination and unexpected finds, such as those imposed on the approval for the Prince of Wales Hospital Expansion Stage 1 (SSD 9113).
	b) A NSW Environment Protection Authority (EPA) Accredited Site Auditor, accredited under the Contaminated Land Management Act 1997, must be appointed to assess the suitability of the site for its intended development and use.	
	c) A Site Audit Statement and Summary Site Audit Report is to be submitted to Council which verifies that the land has been remediated and the site is suitable for the intended development and satisfies the relevant criteria in the NEPM 1999 (as amended 2013).	

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	Any requirements contained within an Environmental Management Plan (EMP) which forms part of the Site Audit Statement and Site Audit Report, form part of this consent and must be implemented accordingly. Council is required to be consulted with prior to the development of the EMP and any comments made by Council are required to be taken into consideration prior to finalising the EMP.	
	d) The site remediation must be carried out to the satisfaction of the Accredited Site Auditor and a Site Audit Statement and Summary Site Audit Report must be submitted to Council prior to the commencement of any above ground building work.	
	<p>e) Prior to commencing any above-ground building work a written report or statement shall be obtained from the Site Auditor, which confirms that:</p> <ul style="list-style-type: none"> <li>• the remediation work has been completed or is progressing in accordance with the Remediation Action Plan; and</li> <li>• the proposed building work is able to be progressed; and</li> <li>• a Site Audit Statement will be provided upon completion in accordance with this consent.</li> </ul>	
	f) Written concurrence must be obtained from Council if the	

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	<p>remediation strategy proposes 'capping' or 'containment' of any contaminated land, details are to be included in the Site Audit Statement (SAS) and Environmental Management Plan (EMP) to the satisfaction of the Site Auditor.</p> <p>Details of the SAS and EMP (including capping and containment of contaminated land) are also required to be included on the Certificate of Title for the subject land under the provisions of section 88 of the <i>Conveyancing Act 1919</i></p>	
	<p>g) A Site Remediation Management Plan must be prepared prior to the commencement of remediation works by a suitably qualified environmental consultant and be implemented throughout remediation works. The Site Remediation Management Plan shall include measures to address the following matters:</p> <ul style="list-style-type: none"> <li>• general site management, site security, barriers, traffic management and signage</li> <li>• hazard identification and control</li> <li>• worker health &amp; safety, work zones and decontamination procedures</li> <li>• prevention of cross contamination</li> <li>• site drainage and dewatering</li> </ul>	

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	<ul style="list-style-type: none"> <li>• air and water quality monitoring</li> <li>• generation and control of dust from the site</li> <li>• disposal of hazardous wastes</li> <li>• contingency plans and incident reporting</li> <li>• details of provisions for monitoring implementation of remediation works and persons/consultants responsible.</li> </ul> <p>A copy of the Site Remediation Management Plan is to be forwarded to Council prior to commencing remediation works.</p>	
	<p>h) Fill material that is imported to the site must satisfy the requirements of the NSW <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the NSW Environment Protection Authority (EPA) Waste Classification Guidelines (2014). Fill material must meet the relevant requirements for Virgin Excavated Natural Material (VENM) or be the subject of a (general or specific) Resource Recovery Exemption from the EPA.</p> <p>Details of the importation of fill and compliance with these requirements must be provided to the satisfaction of the Environmental Consultant and Site Auditor.</p>	
	i) Any new information which is identified during	

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	remediation, demolition or construction works that has the potential to alter previous conclusions about site contamination or the remediation strategy shall be notified to the Site Auditor and Council immediately in writing.	
	j) The written concurrence of Council must be obtained prior to implementing any changes to the remediation action plan, strategies or conditions of development consent.	
	k) Remediation and site validation shall be carried out in accordance with (name of remediation plan) prepared by Douglas Partners Pty Ltd, ref: Project 72505.19, dated April 2021. Any variations to the proposed remediation works or remediation action plan shall be approved by the Site Auditor and a written statement is to be provided to the Council by the Site Auditor prior to the commencement of such works, which confirms the Site Auditors approval of the amended remediation action plan/works.	
	l) The remediation work must not cause any environmental pollution, public nuisance or, result in an offence under the <i>Protection of the Environment Operations Act 1997</i> or <i>Work Health &amp; Safety Act 2011</i> and associated Regulations.	
Compliance with Contamination Reports	2. The requirements contained within any applicable Site Contamination Report, Remediation Action Plan, Site Management Plan or other strategy associated with the site	



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	contamination report and/or remediation strategy approved by Council, form part of this consent and must be complied with.	
Hazardous Materials Compliance	<p>3. Any hazardous and/or intractable wastes arising from any demolition, excavation, building and any remediation works are to be managed and disposed of in accordance with the requirements of SafeWork NSW and the Environment Protection Authority (EPA), including the provisions of:</p> <ul style="list-style-type: none"> <li>• Work Health and Safety Act 2011</li> <li>• Protection of the Environment Operations Act 1997 (NSW)</li> <li>• Protection of the Environment Operations (Waste) Regulation 2014</li> <li>• NSW EPA Waste Classification Guidelines 2014</li> <li>• Randwick City Council's Asbestos Policy</li> </ul>	
EMP Compliance	4. Any requirements contained within an Environmental Management Plan (EMP) which forms part of the Site Audit Statement and Site Audit Report, form part of this consent and must be implemented accordingly.	

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<b>REQUIREMENTS TO BE INCLUDED IN CONSTRUCTION CERTIFICATE</b>		
Cooling towers Compliance	<p>5. Warm water systems and/or Cooling Towers must be designed, installed and maintained in accordance with the requirement of the <i>Public Health Act 2010</i> (Part 4 Microbial Control) and Regulations. The air handling system cooling tower must be designed, installed and operated in accordance with the relevant requirements of AS/NZS 3666.1 (2002), AS/NZS 3666.2 (2002) and AS/NZS 3666.3 (2000).</p> <p>Details of compliance must be provided with the construction certificate application. Waste water from cooling tower warm water systems are to be discharged to the sewer under a Trade Waste Agreement from Sydney Water.</p>	<p>It is proposed that this condition be altered and moved to be a pre-occupation requirement.</p> <p>The stated requirement for compliance for the condenser water system is AS/NZS3666.1-2002, AS/NZS3666.2-2002 and AS/NZS3666.3-2000 will not be met as these standards have been superseded by the standard below.</p> <p>The project proposes the following alternative condition:</p> <p><i>The installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and the following standards:</i></p> <ul style="list-style-type: none"> <li>- AS/NZS 3666.1:2011 Air-handling and water systems of buildings - Microbial control - Design, installation and commissioning</li> <li>- AS/NZS 3666.2:2011 Air-handling and water systems of buildings - Microbial control - Operation and maintenance</li> <li>- AS/NZS 3666.3:2011 Air-handling and water systems of buildings - Microbial control - Performance-based</li> </ul>

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		<i>maintenance of cooling water systems</i>
Noise and Vibration	6. The recommendations and mitigations measures in the acoustic report prepared by Pulse Acoustic Consultancy Pty Ltd Reference 20087 SCH1-CCCC – SSDA Acoustic Assessment – R4 dated 20 April 2021 shall be implemented.	Condition considered acceptable.
<b>REQUIREMENTS PRIOR TO THE ISSUE OF AN OCCUPATION CERTIFICATE</b>		
Noise and Vibration	7. A report, prepared by a suitably qualified and experienced consultant in acoustics, shall be submitted to the Principal Certifier and Council, which demonstrates and certifies that noise and vibration from the development satisfies the relevant provisions of the <i>Protection of the Environment Operations Act 1997</i> , NSW EPA Noise Control Manual & Industrial Noise Policy, Council's conditions of consent (including any relevant approved acoustic report and recommendations), to the satisfaction of Council. The assessment and report must include all relevant fixed and operational noise sources.	Intent of condition is acceptable, but suggest that the reference to Council is removed and the report be prepared to the satisfaction of the Principal Certifier instead.
Cooling towers Compliance	8. Legionella Control – cooling towers, warm water systems and water cooling systems must be installed and operated in accordance with the provisions of the <i>Public Health Act 2010</i> , <i>Public Health Regulation 2012</i> and Australian Standard, AS 3666 at all times.	Condition considered acceptable.

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	<p>Upon installation and prior to issuing an occupation certificate for the development, certification and details of compliance with the abovementioned requirements, prepared by a suitably qualified and experienced person, must be provided to Council's Health Building &amp; Regulatory Services Department.</p> <p>The premises must be registered with Council together with payment of the approved fee, prior to the use or operation of the system.</p>	
<b>OPERATIONAL CONDITIONS</b>		
Protection of the Environment Operations Act 1997	9. The use and operation of the site must not cause any environmental pollution, public nuisance or, result in an offence under the <i>Protection of the Environment Operations Act 1997</i> , associated Regulations, Guidelines and Policies.	Condition is acceptable, however the Project team request that the standard DPIE post occupation conditions are applied.
Noise and Vibration	<p>10. The proposed use of the premises and the operation of all plant and equipment shall not give rise to an 'offensive noise' as defined in the <i>Protection of the Environment Operations Act 1997</i> and Regulations.</p> <p>In this regard, the operation of the premises and plant and equipment shall not give rise to a sound pressure level at any affected premises that exceeds the background (LA90), 15 min noise level, measured in the absence of the noise source/s under consideration by more than 5dB(A). The</p>	<p>This condition is acceptable, however, the condition refers to the NSW EPA Industrial Noise Policy (INP) 2000, this has been superseded by the NSW EPA Noise Policy for Industry (NPI) 2017.</p> <p>The acoustic report prepared by Pulse Acoustic Consultancy Pty Ltd Reference 20087 SCH1-CCCC – SSDA Acoustic Assessment – R4 dated 20 April 2021 report refers to the NPI 2017 not the INP 2000.</p>



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	source noise level shall be assessed as an LAeq, 15 min and adjusted in accordance with the NSW Environmental Protection Authority's Industrial Noise Policy 2000 and Environmental Noise Control Manual (sleep disturbance).	For consistency, the project team requests Council to adopt the revised NPI 2017 as this policy is referenced in the SEAR's and SSDA.