

Independent Environmental Audit (IEA #1) – Proponent Review & Response

Project: HammondCare Greenwich

SSD-136 19 238 – Greenwich Hospital Redevelopment Stage 1 (Early Works)

June 25

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Document Control

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Introduction

Project Application Number & Project Name

SSD-136 19 238 – Greenwich Hospital Redevelopment Stage 1 (Early Works).

Site Address

Greenwich Hospital – 95-115 River Road, Greenwich.

Project Contact Details

Contract Details	
Proponent	HammondCare
Client Representative	TSA Riley
Contractor	Hindmarsh Construction Australia

Independent Auditor

Ramboll Australia were engaged as the Independent Environmental Auditor for the project. The Audit Team comprised of Vanessa Perkins (Lead Auditor), Jenny Auld (Assistant Auditor), James Walker (Project Manager), and Victoria Sedwick (Principal) of Ramboll. The Audit Report was prepared by Jenny Auld and Vanessa Perkins, reviewed by James Walker, and approved by Vanessa Perkins and Victoria Sedwick.

Independent Audit Dates

This was the initial IEA for the project. The Audit Period is from the issue of Development Consent SSD 13619238 on 28 March 2024 to the date of the Audit site visit on 30 April 2025.

IEA 1 Audit Review & Response

Non-Conformances

NC #	Condition of Consent / Requirement (exact wording)	Independent Audit Finding (Summary)	Independent Audit Recommendation & Projects Proposed Action / Action Taken to resolve the matter
NC1	A29: 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 the reporting arrangements in any plans or programs approved under the conditions of this consent; (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; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly;	The Auditors observed documentation in accordance with the consent conditions available on the website with the exception of the following gaps: (iii) all approved strategies, plans and programs required under the conditions of this consent; (viii) complaints register, updated monthly.	To ensure timely upload of all approved strategies, plans and programs under the consent including the monthly complaints register HammondCare will update the project website to include all required documentation in accordance with the consent condition. HammondCare will implement a procedure to ensure documentation produced throughout the project is uploaded and updated as required on the website via the coordination of a recurring monthly meeting with relevant stakeholders to aid the upload of documentation. This has been established (from June 2025) and will continue to be held to review and ensure the timely upload of the project's complaints register on the HammondCare project website.

	(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; (x) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the commencement of operations of each of the respective stages (where relevant).		
NC2	B9: Prior to the issue of a construction certificate for each stage, evidence must be submitted to, and approval obtained from, the Certifier that the operational access and parking arrangements comply with the following requirements: a) all vehicles can enter and leave the Site in a forward direction; b) for the relevant stage: (i) a minimum of 174 on-site car parking spaces are provided for the operation upon completion of Stage 2 of the development; (ii) a minimum of 326 on-site car parking spaces are provided for the operation upon completion of Stage 3 of the development; (iii) a minimum of 329 on-site car parking spaces are provided for the operation upon completion of Stage 4 of the development; (c) adequate access is provided to service vehicle parking / loading / unloading areas upon completion of each stage; (d) the spaces are designed in accordance with AS 2890.1 and AS 2890.6; (e) the swept path of the longest vehicle entering and exiting the Site, as well as manoeuvrability through the Site, is in accordance with AS 2890.2; (f) provision of an EV charging point for a minimum 5% of all car parking spaces; and (g) any requirements of Fire and Rescue NSW.	Documentation has not been provided to confirm approval from the Certifier.	HammondCare has issued documentation to the Certifier and since obtained Certifier approval in accordance with the consent condition. Evidence will be available for future audits.

NC3	B13: Prior to the commencement of construction, the updated landscape plans required by condition B11 must be submitted to the Planning Secretary for approval and incorporate the outcomes of the consultation required by condition B12.	Documentation has been provided to confirm submission of the updated landscape plans to DPHI has been undertaken, however evidence of approval from DPHI has not been provided for Auditor review.	Obtain DPHI approval of the updated landscape plans required by condition B11. The project team is in the process of obtaining DPHI approval for the updated landscape plans required under condition B11. Evidence will be available for future audits.
NC4	B16: Prior to the issue of the relevant construction certificate for external roadworks and access (if any), the Applicant must obtain approval from the relevant roads authority. Notes: - Approval must be obtained for roadworks under section 138 of the Roads Act 1993. - All costs associated with the proposed road upgrade works must be borne by the Applicant. - In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent.	Documentation has been provided regarding consultation with LCC relating to external roadwork and access prior to the issue of CC1.	Evidence has now been obtained, noting that approval for the external roadworks was obtained after the audit took place. Evidence will be available for future audits.
NC5	C1/C2: The Applicant must notify the Planning Secretary and Council in writing of the dates of the intended commencement of construction at least 48 hours before those dates.	Commencement of construction on site was reported to have started on 12 March 2025. A letter from HammondCare to DPHI dated 27 March 2025 reported that notification to DPHI and LCC was notified via the NSW Planning Portal that the “building work commencement date” was 12 March 2025 and that this notification was lodged 48 hours prior to works commencing onsite. The original notification to DPHI and LCC of the	Implement a procedure to ensure that DPHI and LCC are notified of the commencement date of each stage of works is undertaken at least 48 hours before those dates. While notification has been provided, it occurred after the commencement date of construction. The project team is now implementing procedures to ensure that DPHI and LCC are notified at least 48 hours prior to the commencement of Stage 2 and Stage 3.

		commencement of construction has not been reviewed by the Auditors to confirm compliance.	
NC6	C28: Prior to the commencement of construction (excluding demolition) a suitably qualified archaeologist must be appointed as the Excavation Director and must oversee all archaeological works for the entire duration of the construction works.	TSA Riley have advised that an archaeologist has yet to be engaged for the project. The Staging Report reported this condition would be triggered prior to commencement of Stage 4 works. The Auditors consider that this condition is non-compliant as the appointment was required prior to the commencement of construction (excluding demolition).	Engage a suitably qualified archaeologist as the Excavation Director for the project. The project team will engage a suitably qualified archaeologist as the Excavation Director to satisfy Condition 28. Evidence will be available for future audits.
NC7	C34: Evidence of the retirement of credits in satisfaction of condition C32 or payment to the Biodiversity Conversation Fund in satisfaction of condition C33 must be provided to the Planning Secretary prior to commencement of construction.	No documentation has been provided to confirm submission of the required evidence to DPHI prior to the commencement of construction.	The evidence of the retirement credits is available and will be provided for future audits.
NC8	C25: All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP required by condition C18.	As tree removal works were undertaken prior to the site visit and no sediment and erosion control measures were in place, the Auditor's consider this Condition to be non-compliant.	Adequate sediment controls are in place as per the CSWMSP, ensuring compliance with Condition C25. Evidence is available for future audits.

Opportunities for Improvement

Compliance Requirements	Independent Audit Observation / Opportunity for Improvement (Summary)	Independent Audit Recommendation & Proposed Action / Action Taken to resolve the matter
A31: The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.	TSA Riley has provided a Construction Complaints Register which also records non-compliances including incidents. TSA Riley and Hindmarsh advised that no incidents have occurred during this Audit Period.	Prepare a separate Incident Register to the non-compliance register which includes the requirements in accordance with Condition A31. Incidents will be reported as per conditions of consent. The incident and complaints register has now been separated from the non-compliance register, as recommended. Evidence will be available for future audits.
B4: Prior to the issue of the relevant construction certificate, the Applicant must design an operational stormwater management system for each stage of the development and submit it to the Certifier for approval. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed	Documentation has been provided regarding drainage system plans for the construction works. No documentation has been reviewed by the Auditors for the design of the operational stormwater management system. However, the Auditors note that the Certifier has approved an operational stormwater management system as part of issuing CC1	Provide the design of operational stormwater management system to the Auditors for review. A full set of the Civil and Stormwater has been obtained. Evidence will be available for future audits.

in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.		
C8: No later than two weeks before the commencement of construction, a Community Communication Strategy must be submitted to the Certifier and published on the Applicant's website in accordance with condition A29. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners, and others directly impacted by the development), during the detailed design and construction of the development and for a minimum of 12 months following the completion of construction.	Documentation was provided to confirm Version 1.0 was provided to the Certifier and published to the Applicant's website. No documentation was provided to confirm Version 2.0 was submitted to the Certifier and published to the Applicant's website	Provide Version 2.0 to the Certifier and upload onto the Applicant's website. TSA Riley confirms a copy of the Community Communication Strategy Version 2.0 has been issued to the certifier & has been published to the Project Website. Evidence will be available for future audits.
C13: Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary within seven days upon request. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) groundwater management plan including measures to prevent groundwater contamination; (v) external lighting in compliance with all relevant Australian Standards, codes and guidelines; (vi) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C9; (vii) detail the quantities of each waste type generated	A review of the CEMP against Conditions C13(a) to (g) confirms that the CEMP has addressed each of the sub-conditions, with the exception of the following gaps: (iv) groundwater management plan including measures to prevent groundwater contamination. The CEMP refers to Condition C13 (iv) being addressed within the CSWMSP, however no reference to groundwater management is provided in the CSWMSP.	Update the CEMP or CSWMSP to include a groundwater management plan in accordance with Condition C13 (iv). The CEMP and CSWMSP will be updated to include the Groundwater Management Plan accordance with Condition C13 (iv). Evidence will be available for future audits.

during construction and the proposed reuse, recycling and disposal locations; (b) Construction Traffic and Pedestrian Management Sub-Plan (see condition C15); (c) Construction Noise and Vibration Management Sub-Plan (see condition C16); (d) Construction Waste Management Sub-Plan (see condition C17); (e) Construction Soil and Water Management Sub-Plan (see condition C18); (f) Biodiversity Management Sub-Plan (see condition C19); and (g) Construction Flood Emergency Response Plan (see condition C20).		
C20: The Construction Flood Emergency Response Sub-Plan (CFERSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) address the provisions of the Floodplain Risk Management Guide (prepared by EESG published January 2019); and (c) include details of: (i) the flood emergency responses for the construction	A review of the CFERSP against the Conditions C20(a) to (c) confirms that the CFERSP has addressed each of the sub-conditions associated with the work being undertaken at the time of the Audit, with the exception of C20(c). The Auditors note that the CFERSP includes references to the Greenwich Hospital Flood Emergency Response Plan and Greenwich Hospital Flood Assessment (WMS Engineering, 2023), however the referenced documentation has not been provided to the Auditors to review compliance against the Consent Condition.	Update the CFERSP to comply with Condition C20 (c) or include the relevant emergency response plan as an Appendix to the CFERSP. The CEMP and CSWMSP will be updated to include the Groundwater Management Plan accordance with Condition C13 (iv). Evidence will be available for future audits.

phases of the development; (ii) predicted flood levels; (iii) flood warning time and flood notification; (iv) assembly points and evacuation routes; (v) evacuation and refuge protocols; and (vi) awareness training for employees and contractors.		
C23: Prior to the commencement of construction, the Applicant must prepare: (a) flood warning and notification procedures for construction workers on site; as (b) evacuation and refuge protocols (c) awareness training for employees and contractors, including locations of all assembly points and evacuation routes; (d) temporary emergency exits, and signage, including clearly labelled 'direction of travel', in the event of a flooding emergency.	The Auditors note that the Greenwich Hospital Flood Emergency Response Plan and Greenwich Hospital Flood Assessment (WMS Engineering, 2023) is not included in the CFERSP or the CEMP.	Update the CEMP or CFERSP to include the relevant emergency response plan as an Appendix to the CFERSP. The CEMP and CFERSP will be updated to include the relevant emergency response plan as an Appendix to the CFERSP. Evidence will be available for future audits.
C25: Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public residential streets or public parking facilities.	Hindmarsh advised that there is limited parking onsite for contractors as part of Stage 1 works. The site induction for all employees and contractors advises that 'site parking will be limited to essential vehicles only. Private & non-essential vehicles are to park on St Vincent's Road or on adjacent streets'. The Auditors consider there was sufficient parking during this Audit Period for essential vehicles as advised in the training induction.	Hindmarsh to maintain induction outlining requirements for construction worker parking as per current induction protocol. The induction slides have now been amended to include the site parking requirements. Evidence will be available for future audits.
D1: A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements: (a) minimum	One site notice was observed during the site visit at the front of the site office area. The site notice has been prepared in accordance with the consent condition. No additional site notices were observed such as along	Hindmarsh has provided additional site notices to the Stage 1 works zones in addition to the main area in front of the site office area. These Display site notices at various locations through the Stage 1 work areas in

dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size; (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; (c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/noise complaint, must be displayed on the site notice; and (d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.	perimeter hoardings/fencing as required by condition D1(d).	accordance with condition D1(d) ensuring they are visible for the public to view. All site compounds adjacent to public roads now have notice boards that comply with Condition D1. Notice boards have been installed at the main compound, the compound adjacent to St Vincent's Road, and the compound adjacent to River Road, ensuring visibility to the public in accordance with the requirement. Evidence will be available for future audits.
D22: For the duration of the construction works: (a) street trees must not be trimmed or removed, unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees immediately adjacent to the approved disturbance area and property boundary must be protected at all times during construction, in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced to the satisfaction of Council; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the Tree Management Plan for HammondCare Greenwich Hospital NSW appended to the Tree Impact	Hindmarsh advised that protection of the remaining trees within the Stage 1 construction zone were in the process of being protected. The Auditors note that the tree protection plan provided does not specify only trees within the Stage 1 construction zone are required to be protected.	Hindmarsh to maintain tree protection as per tree protection plan and condition D22. Tree protection measures are now in place in accordance with the Tree Protection Plan and Condition D22 Evidence will be available for future audits.

Assessment Report and Tree Management Plan, prepared by Mark Bury Consulting and dated 27 September 2021; and (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.		
C31/ D32: In the event that surface disturbance identifies a new Aboriginal object: (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS), which is managed by Heritage NSW, and the management outcome for the site included in the information provided to AHIMS; (d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and (e) works may only recommence with the written approval of the Planning Secretary.	The Auditors note the unexpected finds protocol is also not included in the site induction	Provide details of the unexpected finds protocol in the site induction to implement awareness to employees and contractors. The project team will engage a suitably qualified archaeologist as the Excavation Director to satisfy Condition D32.

In the event that a burial or skeletal remains are uncovered during work, then: (a) all works must cease immediately in that area and the NSW Police and Heritage NSW contacted; (b) a suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains; (c) the Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the skeletal remains; and (d) works may only recommence with the written approval of Heritage NSW.		
D32: If any unexpected archaeological relics are uncovered during the work, then: (a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; (b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and (c) works may only recommence with the written approval of the Planning Secretary.	A review of the ACHMP does not include management of historical heritage items.	Prepare and implement an unexpected finds protocol for historic heritage. Provide details of the unexpected finds protocol in the site induction to implement awareness to employees and contractors. The project team will engage a suitably qualified archaeologist as the Excavation Director to satisfy Condition D32.

TSA Riley

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