



## Independent Environmental Audit (IEA #2) – Proponent Review & Response

**Project: HammondCare Greenwich**

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

**December 2025**

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Contents

**Introduction..... 3**

Project Application Number & Project Name .....3

Site Address .....3

Project Contact Details.....3

Independent Auditor .....3

Independent Audit Dates .....3

**IEA 2 Audit Review & Response ..... 4**

Non-Conformances.....4

Opportunities for Improvement.....8

## 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 second IEA for the project. The Audit Period is from 1 May 2025 to 08 October 2025.

## IEA 2 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	<p>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:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> <li>(i) the documents referred to in condition A2 of this consent;</li> <li>(ii) all current statutory approvals for the development;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(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;</li> <li>(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;</li> <li>(vi) a summary of the current stage and progress of the development;</li> <li>(vii) contact details to enquire about the development or to make a complaint;</li> <li>(viii) a complaints register, updated monthly;</li> </ul>	<p>The Auditors observed documentation in accordance with the consent conditions available on the website with the exception of the following gaps:</p> <p>(viii) a complaints register, updated monthly.</p> <p>The Auditors noted that the current version of the complaints register is not available on the website.</p> <p>Recommendation: Update the project website to include all required documentation in accordance with the consent condition. Implement a procedure to ensure documentation produced throughout the project is uploaded and updated as required on the website.</p>	<p>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.</p> <p>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.</p>

	<p>(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;</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, and publicly available for 12 months after the commencement of operations of each of the respective stages (where relevant).</p>		
NC2	<p>A36</p> <p>Within three months of:</p> <p>(a) the submission of an incident report under condition A32;</p> <p>(b) the submission of an Independent Audit under condition D47;</p> <p>(c) the approval of any modification of the conditions of this consent (excluding modifications made under section 4.55(1) of the EP&amp;A Act; or</p> <p>(d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out</p>	<p>TSA Riley and Hindmarsh advised that Condition A36(a) and (b) were triggered. Correspondence has been provided to confirm the Certifier was notified in writing of a review, however no correspondence has been provided to confirm submission of the notification of a review to the Department.</p> <p>Recommendation: Prepare and implement a process to ensure that the Department is notified of a review within 3 months of: the submission of a Compliance Report, incident report or IEA; approval of a modification; or issue of a direction of the Planning Secretary.</p>	<p>The project team has implemented a reporting process following receipt of audits to ensure notification is in accordance with A36.</p>
NC3	<p>B13</p> <p>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.</p>	<p>This condition has been assessed as non-compliant during the previous audit period. During this Audit Period, the Department requested a Response to RFI on 19/09/25 and an additional RFI requested on 03/11/25. TSA Riley have advised they are currently preparing a response to the additional RFI.</p>	<p>The project team continues to work with DPHI on the RFI raised and will provide evidence of close out within the next audit period.</p>

		<p>Evidence of approval from the Department has not been provided for Auditor review. Based on the above, the Auditors consider this condition remains non-compliant. Recommendation: Obtain Department approval of the updated landscape plans required by condition B11.</p>	
NC4	<p>C4 Prior to the commencement of construction, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) consult with the relevant owner and provider of services and infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</li> <li>(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the Site (including roads, gutters and footpaths) that have potential to be affected;</li> <li>(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and</li> <li>(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested</li> </ul>	<p>A response to C4 was not provided in the IEARR. The Department subsequently requested a response to the non-compliance. Additional documentation has now been provided to confirm submission of the pre-dilapidation report to LCC, however no documentation has been provided to confirm submission to asset owners.</p> <p>Recommendation: Submit a copy of the Pre-Construction Dilapidation Report to asset owners.</p>	<p>The project team has evidence of submission of documentation required under condition C4 showing evidence of submission of the documentation to asset owners (Council).</p>
NC6	<p>C36 Prior to the commencement of construction involving ground disturbance (excluding demolition), the Applicant must conduct site investigations to confirm the full nature and extent of the contamination at the project area and comply with the following requirements:</p> <ul style="list-style-type: none"> <li>(a) the site investigations must be undertaken, and the subsequent report(s), must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997;</li> </ul>	<p>TSA Riley advised that ground disturbance works commenced onsite on 5 May 2025 and JKE have been engaged and undertaken further investigations onsite which will be documented in a validation report. An updated Remedial Action Plan (RAP) has been prepared by JKE, however this RAP was prepared after the commencement of construction involving ground disturbance and no additional site</p>	<p>The project team continues to engage JK Environments as Validation Consultant and Ramboll as site auditor.</p> <p>Site investigations are ongoing in line with the Remediation action plan (RAP). An updated RAP has been provided to include the outcomes of the site investigations and provided to Ramboll.</p>

	<p>(b) the reports must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme; and</p> <p>(c) the recommendations and the unexpected find procedure of the Remediation Action Plan prepared by JK Environments and dated 5 May 2022 must be updated following results of further site investigations and implemented throughout the duration of the project work.</p>	<p>investigations have been prepared in accordance with condition C36 since the Additional Site Investigation in May 2022. Based on the above, it is considered this condition is non-compliant.</p> <p>Recommendation: Complete the additional site investigations in accordance with C36(a)-(c)</p>	<p>An interim validation report is provided at the completion of Stage 1 works, and a final validation report will be prepared and submitted during Stage 2 / 3 when remediation is complete in accordance with the RAP.</p>
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## Opportunities for Improvement

Condition	Independent Audit Observation / Opportunity for Improvement (Summary)	Independent Audit Recommendation & Proposed Action / Action Taken to resolve the matter
D31	<p>The amended site induction was reviewed which included details of the unexpected finds protocol, however the unexpected finds protocol in the ACHMP was not updated. The ACHMP refers to entering details on the AHIMS in Section 1.3, however the unexpected finds protocol in the ACHMP has not specifically included this requirement.</p> <p>Recommendation: Based on the documentation provided, the condition is considered compliant with an opportunity for improvement. Amend the unexpected finds protocol in the ACHMP to include reference to the requirement to register the site of the object on AHIMS in accordance with Condition D31(c).</p>	The project team will review with proposed amendments with Cultural Heritage Connections, our consultant to consider opportunity for improvement.
D32	<p>The ACHMP has not been updated to include management of historical heritage. TSA Riley advised the site induction was updated to include details of the unexpected finds protocol, however the induction only refers to Aboriginal heritage and does not include historical heritage.</p> <p>Recommendation: Based on the documentation provided, the condition is considered to remain compliant with an opportunity for improvement. 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.</p>	The project team will review with proposed amendments with Cultural Heritage Connections, our consultant to consider opportunity for improvement.



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