

Independent Environmental Audit (IEA #3) – Proponent Review & Response

Project: HammondCare Greenwich

SSD-136 19 238 – Greenwich Hospital Redevelopment Stages 2 & 3

September 2026

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Document Control

Prepared for issue:	Leon Lyon Dodig	Date:	17 September 2026
Final for upload:	Mardi Christian	Date	18 September 2026

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Introduction

Project Application Number & Project Name

SSD-136 19 238 – Greenwich Hospital Redevelopment Stages 2 & 3.

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 Emily Rowe (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 Emily Rowe, reviewed by Victoria Sedwick, and approved by Emily Rowe and Victoria Sedwick.

Independent Audit Dates

This was the third IEA for the project. The Audit Period is from 9 October 2025 to 23 June 2026.

IEA 3 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	A10: Staging of the development may be varied (for either construction or operation) in accordance with a revised Staging Report submitted to and approved by the Planning Secretary prior to that stage of construction and/or operation commencing.	The Auditors reviewed the revised Staging Reports and noted that the staging arrangements were amended to permit concurrent Stage 2 and Stage 3 construction. Documentation provided indicated the revised reports were submitted to the Department as part of the Modification 2 application and DPHI were notified on 25/02/2026 of the planned commencement of Stage 2 and Stage 3. However, the requirement to obtain the DPHI's approval of the revised staging, as presented in the revised Staging Reports, prior to commencing the subject stage of construction was not complied with, most likely as an oversight.	The project team notes that Modification 2 has now been approved, including Staging Report Rev 7 which formalises the concurrent delivery of Stages 2 and 3. The project team will continue to review approval timeframes against construction programs to ensure relevant approvals are obtained prior to commencement of future works.
NC2	A24: The project must comply with the relevant sections of Planning for Bush Fire Protection (2019) including, but not limited to: (a) Chapter 6 – Special Fire Protection Purpose Developments (where relevant); (b) Asset Protection Zones (APZs) and building construction (Table 6.8a); (c) Safe operational access for emergency services personnel (Table 6.8b); and (d) Water, electricity and gas (Table 6.8c).	The Auditors reviewed the bushfire compliance assessments prepared for the project. Whilst compliance with several requirements of Planning for Bush Fire Protection 2019 had been assessed, no assessment was provided in relation to Condition A24(d) concerning water, electricity and gas infrastructure requirements.	The project team will review the available bushfire compliance documentation and arrange a suitable assessment of Condition A24(d), where required, to confirm compliance and update project records accordingly.

NC3	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; (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).	Review of the HammondCare project website identified that several documents required under the consent were not publicly available. The Auditors noted that approved modifications and plans, monitoring results summaries and certain Planning Secretary approved documentation were not available directly on the website itself.	The project team will update the project website to include the required documentation not currently available, including Planning Secretary approved documentation, and ensure information is published directly on the project website in accordance with the consent requirements.
NC4	B10: Prior to the issue of the relevant construction certificate, design details in relation to the secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifier demonstrating: NSW Government 15 Greenwich Hospital Redevelopment – Detailed Design Department of Planning, Housing and Infrastructure (SSD-13619238)	The Auditors reviewed documentation relating to bicycle parking and end-of-trip facilities. Whilst evidence indicated that some requirements had been incorporated within the design, the Auditors were unable to verify compliance with all	The project team will review the available documentation relating to bicycle parking and end-of-trip facilities to confirm compliance with Condition B10. Where required, supporting evidence will be submitted to the Certifier and approval obtained.

	(a) the provision of a minimum 20 bicycle parking spaces; (b) compliance of the layout, design and security of bicycle facilities with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking; and (c) the provision of end-of-trip facilities for staff which must include at least 3 showers, a changing area and 6 lockers.	aspects of Condition B10 and no evidence was provided confirming the Certifier's approval of the supporting documentation.	
NC5	A8: Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. B18: Prior to the issue of the relevant construction certificate, the Applicant must submit to the satisfaction of the Certifier evidence demonstrating that Crime Prevention Through Environmental Design (CPTED) measures have been incorporated into the development to maximise security in and around the development. The final CTPED measures must be prepared in consultation with NSW Police and shown on all relevant architectural and landscape plans approved by the Certifier. CPTED measures must include, but not be limited to: (a) monitored CCTV facilities throughout the development; (b) a lighting policy designed to the Australian and New Zealand Lighting Standards. Australia and New Zealand Lighting Standard 1158.1 – Pedestrian which considers crime risk and fear when selecting lamps and lighting levels; (c) security mirrors installed within corridors and on blind corners to enable users to see around blind corners; (d) intercom facilities installed at all pedestrian entry/exit points to enable residents to communicate and identify with people	The Auditors reviewed the CPTED certification and supporting documentation provided for CC2. Evidence was not provided demonstrating consultation with NSW Police on the final CPTED measures, nor confirming that all Condition B18 requirements were shown on the approved architectural and landscape plans.	The project team is undertaking consultation with NSW Police regarding the CPTED measures and will seek further clarification regarding the existing certifications and supporting documentation to demonstrate how the requirements of Condition B18 have been addressed.

	prior to admitting them to the development; and (e) all recommendations within the Crime Prevention Through Environmental Design report prepared by Ethos Urban dated 29 April 2022.		
NC6	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: (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; (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 the recommendations and the unexpected 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.	TSA Riley advised that additional contamination investigations had been undertaken during the audit period. The Auditors reviewed the investigation reports and noted that they had not been prepared, reviewed or approved by a certified CEnvP(SC) or CPSS CSAM consultant as required by Condition C36.	JKE personnel on the Greenwich project are in the process of acquiring CEnvP(SC) certification.
NC7	D5: Construction activities may be undertaken outside of the hours in condition D4 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (a) for the delivery, set-up and removal of construction cranes, where notice of the crane related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or (b) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is	The Auditors reviewed records relating to out-of-hours works undertaken during the audit period. Whilst evidence was provided of Council approvals and community notifications for certain activities, evidence was not available demonstrating that all out-of-hours works either met the exemption criteria under Condition D5 or had received approval from the Planning Secretary.	The project team will review the approval processes for out-of-hours works and ensure future activities are appropriately assessed against the consent requirements and approved by the relevant authority where required.

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	provided for the works.		
NC8	D10 The Applicant must implement the SIMP required by condition C24 for the duration of the construction works.	Based on the documentation reviewed, site inspection and interviews with project personnel, the Auditors considered that the Social Impact Management Plan had generally been implemented during the audit period. However, no evidence was provided demonstrating implementation of the social impact monitoring framework required under the SIMP.	The project team has commenced quarterly monitoring in accordance with the SIMP social impact monitoring framework and will continue to maintain records of monitoring outcomes, mitigation measures and implementation actions.

Opportunities for Improvement

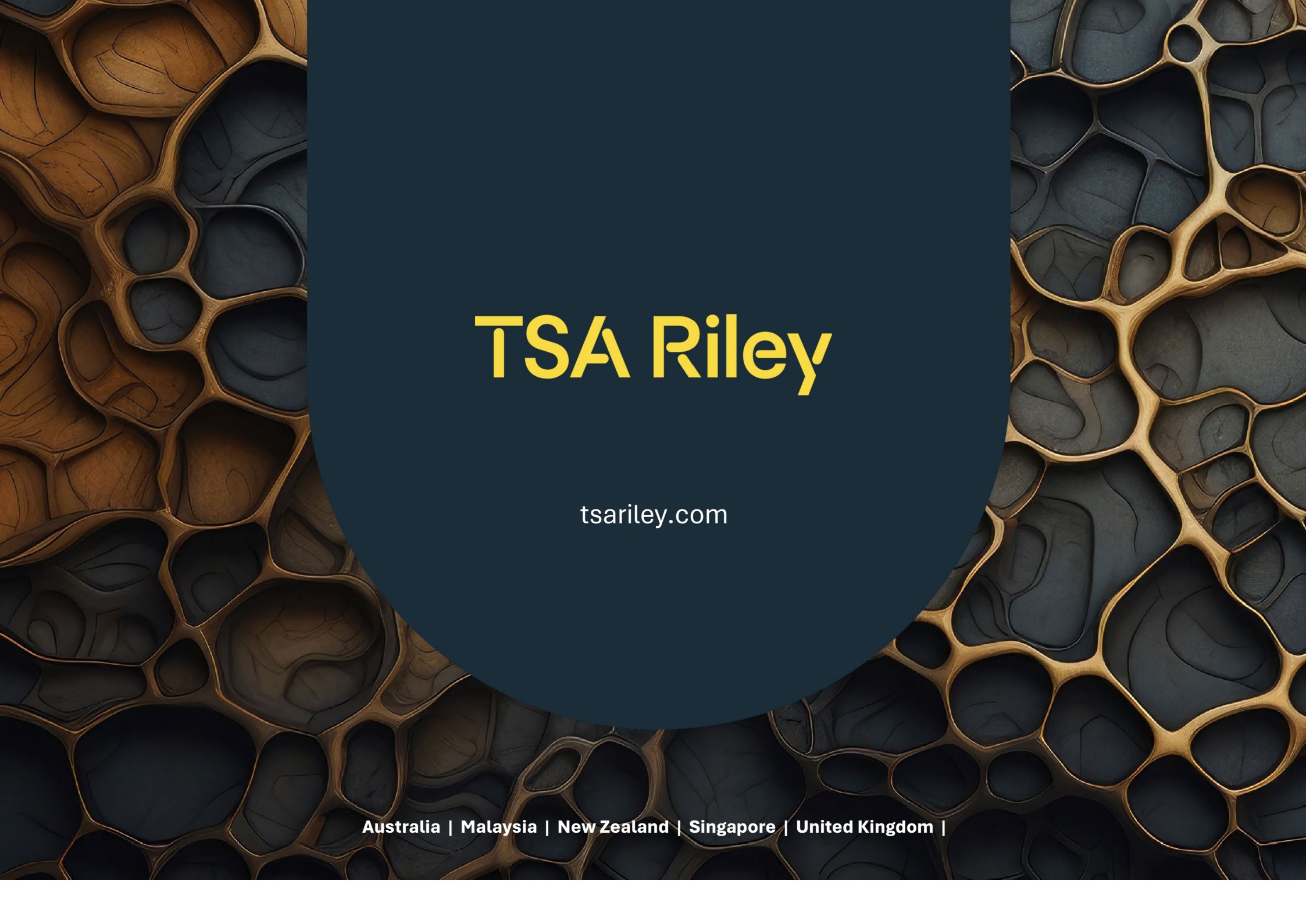
Condition	Independent Audit Observation / Opportunity for Improvement (Summary)	Independent Audit Recommendation & Proposed Action / Action Taken to resolve the matter
OFI1 (A23)	TBE assessed compliance with the bushfire requirements and advised the development should be designed to Bushfire Attack levels (BAL) 19 in accordance with changes to the NCC and Planning for Bush Fire Protection. Accordingly, compliance was assessed against Sections 3 and 6 of AS3959 rather than Section 5 as referenced by the consent. The Auditors accepted the approach but recommended confirmation from the Department.	The project team will consult with the Department to confirm the assessment approach adopted by TBE and retain correspondence confirming the Department's position.
OFI2 (A33)	Documentation confirmed the Department was notified of the non-compliances identified in IEA 2 within the required timeframe. However, the Applicant's response was submitted via email rather than the Major Projects Portal, notwithstanding the notification requirement being met.	The project team will ensure future notifications of non-compliances are submitted through the Major Projects Portal and clearly identify all relevant consent requirements being satisfied by the submission.
OFI3 (B9)	Evidence was available demonstrating operational access and parking arrangements had previously been assessed. Whilst the Auditors accepted that Stage 2 and 3 works did not materially alter these arrangements, no evidence was provided demonstrating a further review was undertaken prior to the issue of CC2.	The project team will ensure future construction stages include formal review of operational access and parking arrangements and obtain confirmation from the Certifier where required.

OFI4 (C2)	Commencement notifications were issued to both the Department and Council within the required timeframe. However, the notifications did not clearly describe the specific development works being undertaken as part of the notified stage.	The project team will ensure future commencement notifications include a description of the development works to be undertaken within the relevant stage.
OFI5 (C22)	The Auditors considered the Dewatering Management Plan generally addressed the consent requirements following clarification from the project team. However, groundwater trigger levels, response actions and notification requirements were not clearly consolidated within a single TARP, reducing clarity for implementation and future auditing.	The project team will review the Dewatering Management Plan and consider incorporating a consolidated TARP and additional detail regarding trigger levels and response measures.
OFI6 (C25)	The CTPMSP includes measures to discourage workforce parking on surrounding streets and promote alternative transport options. Site personnel advised some office-based staff may still park on nearby streets, although no community complaints regarding parking were recorded during the audit period.	The project team will continue to promote alternative transport options and review measures to minimise workforce parking on surrounding streets.
OFI7 (C36)	Additional contamination investigations identified contamination in areas not previously addressed within the RAP. Whilst investigations were ongoing, the RAP had not been updated to incorporate those findings, which may assist in managing future remediation and worker safety considerations.	The project team will continue to review contamination investigation outcomes and consider progressive updates to the RAP where required.

OFI8 (D4)	A complaint was received alleging a construction vehicle accessed the site prior to approved construction hours. Whilst this could not be independently verified, the Auditors identified an opportunity to further strengthen controls relating to contractor arrivals.	The project team will remind contractors of approved construction hours and review site controls to minimise the potential for vehicle arrivals outside approved hours.
OFI9 (D9)	Environmental controls were generally observed to be implemented to a high standard during the site inspection. Minor maintenance issues were identified relating to erosion and sediment controls and tree protection fencing. The Auditors also noted that project records did not clearly document the management and relocation outcomes of fauna hollows associated with tree removal works.	Project team to review current implementation and assess any changes required.
OFI10 (D12)	Monitoring undertaken by TBE confirmed that the required nest boxes had been installed; however, a number of nest boxes were located outside the areas shown within the approved VMP and no explanation or justification for the revised locations was recorded within the monitoring documentation.	Project team to assess any reasoning and implement any required solutions based on the investigation.
OFI11 (D13)	Two construction vehicles were observed parked on St Vincents Road during the site inspection. Whilst it could not be confirmed whether the vehicles were associated with the project, the Auditors identified an opportunity to strengthen monitoring of surrounding streets to demonstrate compliance.	The project team will continue to monitor surrounding streets and reinforce site access and parking requirements with contractors where required.

OFI12 (D25)	Erosion and sediment controls were generally well maintained across the site. However, minor maintenance improvements were identified during the site inspection to ensure the controls remain effective as construction progresses.	The project team will continue to monitor and maintain erosion and sediment controls throughout the construction phase in accordance with the approved management plans.
OFI13 (D30)	Emergency awareness training is provided through site inductions and emergency evacuation drills are undertaken. Whilst emergency procedures were included within the induction material, a site layout identifying assembly points and evacuation routes was not incorporated within the induction package.	The project team will review the Site Specific Induction and consider inclusion of a site layout plan identifying assembly areas and evacuation routes.
OFI14 (D31)	No unexpected Aboriginal heritage finds occurred during the audit period. Existing procedures reference Aboriginal heritage management requirements; however, they do not fully address all requirements of Condition D31, including AHIMS registration and recommencement of works following Planning Secretary approval.	The project team will review the existing Aboriginal Heritage Unexpected Finds Protocol and consider updates to better align with the consent requirements.
OFI15 (D32)	No unexpected historic heritage finds occurred during the audit period. Existing induction materials address unexpected European heritage finds; however, they do not fully address all notification, consultation and approval requirements prescribed by Condition D32.	The project team will review the existing Historic Heritage Unexpected Finds Protocol and consider updates to better align with the consent requirements.

OFI16 (D33)	No burials or skeletal remains were encountered during the audit period. Existing procedures reference human remains; however, they do not fully address the notification, consultation and approval requirements required under Condition D33.	The project team will review the existing protocols relating to the discovery of human remains and consider updates to better align with the consent requirements.
OFI17 (D36)	The Auditors noted that the CWMSP addresses management of demolition and construction concrete waste. However, the document does not specifically address the management of concrete rinse water associated with future concrete construction activities.	The project team will review the CEMP and CWMSP and consider inclusion of additional measures relating to the management of concrete waste and rinse water.
OFI18 (D39)	Certification was provided demonstrating consideration of AS4282 lighting requirements. The project team also provided advice that lighting design principles from the National Light Pollution Guidelines for Wildlife had been considered; however, final certification for the completed lighting design was not yet available at the time of the audit.	The project team will continue to work with the design consultants to ensure certification is obtained demonstrating compliance with the National Light Pollution Guidelines for Wildlife as required.

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