

Operational Independent Environmental Audit

Wellington Solar Farm - SSD 8573 (Mod 2)

Lightsource BP Pty Ltd

12 April 2023



Document Control





Key Project Details Client		
Client	Lightsource BP (LSBP)	
Project	Wellington Solar Farm	
Construction Contractor	Sterling and Wilson (S&W)	
Operational Contractor	Sterling and Wilson (S&W)	
Client manager / Role	Diana Mitchell - LSBP Head of Planning, Australia and New Zealand	
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  <p>We acknowledge the traditional owners and custodians of the land on which we work and we pay respect to the Elders, past, present and future.</p>		

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1 Executive Summary

J2M Systems Pty Ltd was engaged by Lightsource BP Pty Ltd (LSBP) to undertake this operational phase independent environmental audit (Operational IEA) at the Wellington Solar Farm (referred to as WSF or the project) in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Project Approval SSD 8573 Modification 2 ('Project Approval').

Project Approval was granted on 25 May 2018 and has been modified on two occasions at the date of this audit, being SSD 8573 Modification 1 (Project Approval Mod 1), approved 11 December 2019 and Modification 2 (Project Approval Mod 2), approved 03 April 2020. Project Approval MOD 2, which is the scope of this audit, includes conditions for construction, operation and decommissioning of a 200MWdc solar farm at Goolma Road, Wuuluman NSW, including associated ancillary infrastructure.

The project is located along Goolma Road, Wuuluman NSW, approximately 2km north east of Wellington in central NSW. The project is within the Dubbo Regional Council Local Government Area (LGA). The construction element of the project was delivered under two scopes of work, that being the solar farm works and the substation works. LSBP engaged separate head contractors to deliver the two scopes of work, that being Sterling & Wilson Pty Ltd (S&W) for the solar farm works, and TransGrid for the substation works. LSBP has continued to engage S&W for the operational phase of this project. WSF Construction of WSF commenced on 04 December 2019. Following construction completion, handover and commissioning, WSF commenced operations on 23 December 2023.

Schedule 4, Condition 18 of the current Project Approval requires LSBP to commission an IEA within three months of the date of commencement of construction, within 3 months of commencement of operations, and as directed by the Secretary.

The Construction IEA, undertaken by J2M Systems in February 2020, assessed conditions relating to construction and was undertaken within 3 months of commencing construction. This Operational IEA assesses conditions relating to operations and was undertaken within 3 months of commencing operations. This audit considers all conditions of consent (CoC) of the project approval, as well as the mitigation measures proposed within the original environmental impact assessment and is consistent NSW Department of Planning, Industry and Environment (DPIE) Requirement 2 Independent Audit Post Approval Requirements (DPE 2018).

J2M Systems was formally commissioned on 23 January 2020 to carry out the IEAs of the WSF. NSW DPIE approved Peter Marshman of J2M Systems as the auditor via correspondence dated 29 January 2020.

The audit methodology included:

- Audit planning and discussions with LSBP representatives with regard to audit timing, provision of documentation, site visits and personnel involvement;
- Review of audit documentation provided by LSBP and S&W;
- Consultation with relevant Government agencies, Registered Aboriginal Parties and the key stakeholders as identified by LSBP;
- Site inspection undertaken between 28 February and 02 March 2023;
- Review of additional audit documentation provided by LSBP and S&W during and after the audit site inspection via email submission between 28 February and 20 March 2023;
- Submission of draft report to LSBP for review of adequacy and as an opportunity for LSBP to confirm findings and/or provide additional information; and
- Finalisation of report.

The previous Construction IEA in February 2020 identified a good level of compliance with the environmental management obligations under Project Approval, however, the solar farm construction

contractor's implementation of the project environmental management plans appeared non-systematic and underprepared due to substantial changes to team personnel in the early stages of construction. The 2020 Construction IEA identified five (5) non-compliances against the five conditions of Project Approval and a further eight (8) auditor recommendations for continual improvement. With the exception of three (3) of eight (8) auditor recommendations for continual improvement, these matters have all been resolved.

This Operational IEA of the WSF determined that the project is generally compliant with their environmental management obligations under the Project Approval SSD 8573 Mod 2 and that the actual impacts of the project appear consistent with those predicted in the Environmental Impact Statement. That being said, and as identified in the Construction IEA, the construction contractor's implementation of their project environmental management plans has for some elements, such as weed management and landscape planting, been non-systematic and underprepared resulting in implementation-based non-conformances being identified during this audit.

Overall this Operational IEA identified:

- Four (4) non-compliances against the four (4) conditions of Project Approval;
- One (1) non-compliance against one (1) proposed mitigation measure within the EIS;
- Four (4) new auditor recommendations for continual improvement; and
- Three (3) outstanding auditor recommendations for continual improvement which remain open from the construction IEA.

A detailed audit table is presented in Appendix A identifying audit evidence, findings and recommendations. Section 3 of this report outlines consultation undertaken with key stakeholders in relation to this Operational IEA. Section 4 of this report presents the audit findings, including an assessment of the adequacy of management plans and summary of environmental performance. Section 5 of this report presents non-compliances and auditor recommendations identified against the audit scope.

2 Introduction:

2.1 Project Background

J2M Systems Pty Ltd was engaged by Lightsource BP (LSBP) to undertake this operational independent environmental audit (Operational IEA) on the Wellington Solar Farm (referred to as 'WSF' or 'the Project') in accordance with Schedule 4, Condition 18 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Project Approval SSD 8573 (Project Approval).

Project Approval was granted on 25 May 2018 and has been modified on two occasions at the date of this audit, being SSD 8573 Modification 1 (Project Approval Mod 1), approved 11 December 2019 and Modification 2 (Project Approval Mod 2), approved 03 April 2020. Project Approval MOD 2, which is the scope of this audit, includes conditions for construction, operation and decommissioning of a 200MW dc solar farm at Goolma Road, Wuuluman NSW, including earthworks, installation of solar panels, collector substations, switching stations, permanent offices, site compounds, electricity transmission lines and internal roads.

The project is located along Goolma Road, Wuuluman NSW, approximately 2km north east of Wellington in central NSW. The project is within the Dubbo Regional Council Local Government Area (LGA). The construction element of the project was delivered under two scopes of work, that being the solar farm works and the substation works. LSBP engaged separate head contractors to deliver the two scopes of work, that being Sterling & Wilson Pty Ltd (S&W) for the solar farm works, and TransGrid for the substation works. LSBP has continued to engage S&W for the operational phase of this project. WSF Construction of WSF commenced on 04 December 2019. Following construction completion, handover and commissioning, WSF commenced operations on 23 December 2023.

Schedule 4, Condition 18 of the Project Approval Mod 2 requires LSBP to commission an IEA within three months of the date of commencement of construction, within 3 months of commencement of operations, and as directed by the Secretary. The Construction IEA, undertaken by J2M Systems in February 2020, assessed conditions relating to construction and was undertaken within 3 months of commencing construction. This Operational IEA assesses conditions relating to operations and was undertaken within 3 months of commencing operations. The audit considers all conditions of consent (CoC) of the project approval, as well as the mitigation measures proposed within the original environmental impact assessment and is consistent NSW Department of Planning, Industry and Environment (DPIE) Requirement 2 Independent Audit Post Approval Requirements (DPE 2018).

J2M Systems was formally commissioned on 23 January 2020 to carry out the IEAs of the WSF. NSW DPIE approved Peter Marshman of J2M Systems as the auditor via correspondence dated 29 January 2020 (Refer to Appendix B).

2.2 Scope of Work

The scope of the independent environmental audit is pre-determined by Schedule 4, Condition 18 of the SSD 8573 Mod 2 and is reproduced here:

The audits must:

- a) *be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);*
- b) *be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- c) *be prepared, unless otherwise agreed with the Secretary:*
 - (i) *within 3 months of commencing construction;*
 - (ii) *within 3 months of commencement of operations; and*
 - (iii) *as directed by the Secretary;*
- d) *be carried out in consultation with the relevant agencies;*
- e) *assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and*

- f) *recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.*

In addition to this, the scope of the audit is also defined in Section 3.3 of the *Independent Audit Post Approval Requirements* (DPE 2018), and is reproduced here:

An Independent Audit must include:

1. *an assessment of compliance with:*
 - a. *conditions of consent applicable to the phase of the development that is being audited;*
 - b. *all post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;*
 - c. *all environmental licences and approvals applicable to the development excluding environmental protection licences issued under the Protection of the Environment Operations Act 1997;*
2. *an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:*
 - a) *actual impacts compared to predicted impacts documented in the environmental impact assessment;*
 - b) *the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;*
 - c) *incidents, non-compliances and complaints that occurred or were made during the audit period;*
 - d) *the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;*
 - e) *feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;*
3. *the status of implementation of previous Independent Audit findings, recommendations and actions (if any);*
4. *a high-level review of the project's environmental management systems (if any), including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems. It is not expected that an Independent Audit comprises a management system audit, however any key deficiencies identified in the system should be discussed;*
5. *a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate*; and*
6. *any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.*

The criteria of the audit included the requirements of:

- Works and programs relevant to the operational phase of the development.
- Considerations of works since completion of the Construction IEA, February 2020
- Project Approval (Appendix A – Audit Table);
- Implementation of strategies/management Plans/programs required by the Project Approval during the Operational phase, including:
 - Construction Environmental Management Strategy;

- Biodiversity Management Plan;
- Cultural Heritage Management Plan;
- Traffic Management Plan;
- Soil, Water, Stormwater Management Plan; and
- Landscaping Plan.

2.3 Audit Period

The audit period is defined as the period between the Construction IEA (February 2020) to completion of the audit site inspection 02 March 2023.

2.4 Audit Team

In accordance Section 3.1 of the NSW DPE Independent Audit Post Approval Requirements (DPE 2018), this Operational IEA was completed by Peter Marshman of J2M Systems Pty Ltd. NSW DPIE approval of the auditor is provided in Appendix B of this report. No technical specialists were nominated or requested for this audit. The Auditor's declaration of independence is provided in Appendix D of this report.

2.5 Methodology

2.5.1 Document review

Preparation for the IEA involved a desktop review of the documentation identified in the scope of this audit (Refer to Section 1.2). This included relevant plans, programs and statutory requirements. An audit checklist was developed as part of this review (Appendix A – Audit Table). An adequacy assessment of plans and programs required under the consent is provided in Section 4.5 of this report. The Auditor is a general environmental management systems auditor and is not qualified as a technical expert in any of the specialist topics of the management plans that were reviewed. Adequacy of the management plans is determined by:

- review of the plan(s) against the relevant development of approval requirements;
- considering that the plan(s) have been reviewed and approved by relevant agencies; and
- considering the environmental performance of the project with regard to the content and currency of the plan.

A technical review is not included and this is assumed to have been done in the development of the plan, in consultation with relevant Agencies, and through the relevant approval processes.

2.5.2 Opening and Closing Meeting

An opening meeting was held on Tuesday 28 February 2023 to introduce the auditor to the project management team and to outline the audit process and confirm audit arrangements. An interim closing meeting was held on Thursday 02 March 2023 following completion of the site inspection and site-based interviews to provide a summary of audit findings at the time, noting that further review of evidence was required prior to finalising audit findings. The issue of the draft report is considered as the close of the audit and is formal notification of any assessed non-compliance (if any).

Audit attendance at the opening and closing meeting is summarised in Table 1 below.

Table 1: Audit attendance

Name	Title - Organisation	Opening Meeting	Closing Meeting
Diana Mitchell	LSBP Head of Planning, Australia and New Zealand.	Yes	Yes
Tim Lambert	LSBP Construction Manager	Yes	No
Donnacha Culloo	LSBP Project Manager	Yes	Yes
Sajid Mahmud	LSBP Asset Manager	Yes	Yes
Peter Allan	S&W National HSE Manager	Yes	Yes
Brendan O'Reilly	S&W O&M Site Manager	Yes	Yes
Guru Prasad	S&W Manager	Yes	Yes
Peter Marshman	J2M Systems Lead Auditor	Yes	Yes

2.5.3 Site inspection and Interviews

Site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site including a check of all active work areas at the time of the audit, remediation areas, aboriginal heritage sites and environmental protection zones. Outcomes of the site inspections are provided in Section 4.8.

2.5.4 Reporting

The audit report was developed between 28 February and 28 March 2023. A draft report was provided to LSBP via email dated 04 April 2023. The audit report was finalised on 12 April 2023.

2.5.5 Compliance Status Descriptors

The compliance status of each compliance requirement in the Audit Table (Appendix A) has been determined using the relevant descriptors in Table 2 below as required by the NSW DPE Independent Audit Post Approval Requirements, June 2018.

Table 2: Compliance Status Descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

2.6 Site Description and Operation

2.6.1 Site Location

The project is located along Goolma Road, Wuuluman NSW, approximately 2km north east of Wellington in central NSW. The project is within the Dubbo Regional Council Local Government Area (LGA). The dominant land use on the project site and in the local area is agriculture, through some native vegetation remnants are present across some areas of the site (NGH, 2017), including some endangered ecological communities. Full details of the site, including proposal layout, key environmental issues and site constraints are detailed within the Wellington Solar Farm Environmental Impact Statement, prepared by NGH Environmental, November 2017.

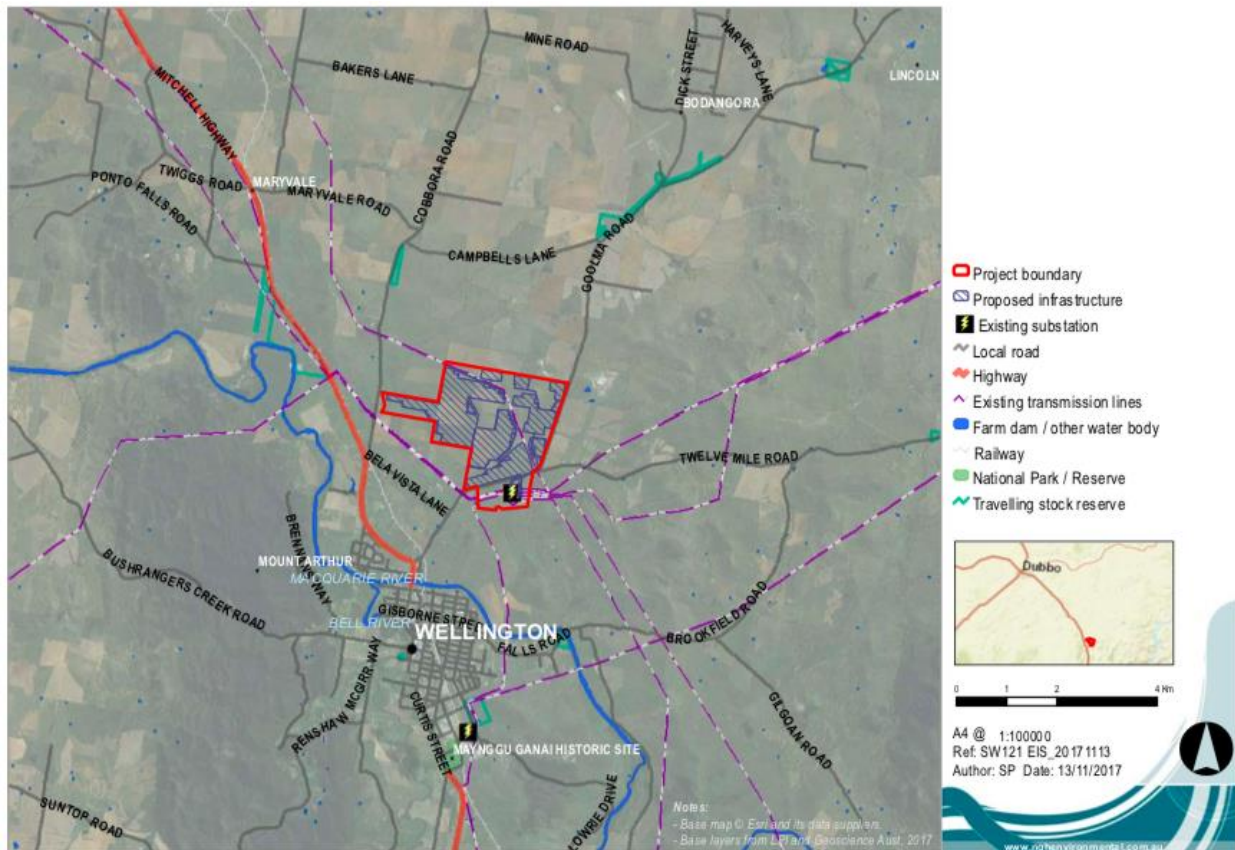


Figure 1: Project location. Sourced from Wellington Solar Farm, Environmental Impact Statement, NGH Environmental, November 2017.

3 Consultation with relevant agencies

As part of the audit process, J2M Systems undertook consultation with the following stakeholders to obtain feedback on the scope of the audit and gain an understanding of their interests in the Project and its environmental performance. Notification of a request for consultation was issued via the official agency portal as directed by NSW DPIE.

Following the audit site inspection and upon the realisation that no response was received, the auditor independently contacted the following

- Wellington Valley Wiradjuri Aboriginal Corporation;
- Gallangabang Aboriginal Corporation;
- Wellington Local Aboriginal Land Council.

This section provides a summary of feedback and scope requests received. Record of the correspondence received via email is provided in Appendix C.

3.1 NSW DPIE

Katrina O'Reilly, Senior Compliance Officer for NSW DPIE provided an email response received 28 February 2023 requesting the following:

- The Department would (like) consultation to be undertaken with Council, Local Aboriginal Land Councils, Transport for NSW, Biodiversity Conservation Division (BCD) and NSW Environmental Protection Agency (NSW EPA).

Auditor response: *Consultation with relevant parties is outlined in this section. Consultation occurred prior to the auditor receiving this response from NSW DPIE. Consultation was undertaken using the NSW DPIE Major Projects Portal.*

- Areas for consideration for operational stage include:

- Weed management / rehabilitation and landscaping.

Auditor response: *These items are addressed under the following conditions of project approval: CoA S3.7 Landscaping – Vegetation buffer, S3.8 Landscaping Plan, S3.9 Land Management, S3.11 Biodiversity Management Plan.*

- Compliance with conditions and with commitments with the relevant management plans.

Auditor response: *This is the primary scope of this audit and as such has been considered in completing this Operational IEA.*

- Monitoring plans – as required in management plans.

Auditor response: *Addressed within this report, Refer to section 4.5 'Adequacy of management plans' and Section 4.7 'Actual versus potential impacts'.*

- Management of erosion and sediment control measures.

Auditor response: *The majority of erosion and sediment control measures were applicable during construction phase which was completed over 1 year ago and were not observed by the audit other than during the Construction IEA in February 2020. The auditor undertook a site inspection during this audit and confirms that sediment and erosion control measures such as vegetated swales, rock lined swales, rock check drainage lines, earth bunds, and sediment fencing are installed and maintained in high-risk areas on site.*

- Stormwater management and compliance with relevant management plans.

Auditor response: *Refer to above response. Stormwater management was assessed through visual observations only. No immediate issues were identified in relation to stormwater management on site.*

3.2 NSW Department of Primary Industries | Agricultural Resources

Mary Kovac, Agricultural Landuse Planning Office provided an email response dated 04 August 2022, which outlined the following statements:

- The salvage (of topsoil) occurs and final placement of the vegetative and soil resources for the ongoing operation of the area is a key to the ongoing successful revegetating of the site to protect the soil resource. Issues such as settling, ponding, erosion potential etc. need to be avoided so this will require ongoing monitoring particularly over the first 12 months of soil placement;

Auditor response: *Salvage of topsoil was unable to be observed due to completion of construction activities, however the majority of all disturbed areas have been rehabilitated with groundcover being a mixture of native and non-native pastures, as well as some introduced weeds. There is no specific requirement for monitoring of soil settling, ponding, erosion potential etc, however this is considered as part of the environmental inspections when completed.*

Site inspections were undertaken and confirmed the re-use of coarse woody debris in management zones 3 and 4 generally in a manner consistent with the requirement set out in the Biodiversity Management Plan.

- It is now over 2 years with substantially more rainfall and storm activity that may have impacted on the stability of the land and vegetative growth that would be useful to measure.

Auditor response: *It is considered outside the audit scope to measure stability of land and vegetative growth as these require long term monitoring programs to be meaningful. Based on visual observations of the site as assessed at the time of the Construction IEA (following a period of intense drought) and at the time of this operation IEA (following 2 years of high rainfall) it is evident that vegetative ground cover has vastly improved, both in density (coverage) and apparent diversity.*

Implementation of the biodiversity management plan (CoC S3.10) was assessed as non-compliant with the following relevant deficiency noted:

- *No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3).*
- Related to this is the ongoing land management of the site that will be based on native pasture establishment and its ongoing management.

Auditor response: *There was no evidence to support active rehabilitation of native pasture, however native pasture species may be included in the composition of naturally rehabilitation groundcover.*

Implementation of the biodiversity management plan (CoC S3.10) was assessed as non-compliant with the following relevant deficiency, among others, noted (refer to s.5.1 for full details of NC):

- *The regeneration seed mix reportedly utilised for pasture rehabilitation is inconsistent with the target to established perennial native pasture species under solar panels (BMP, Appendix A – Ground Cover Management Plan) as it does not contain native pasture species.*

- With the last 2 years of more rain, it will be of interest to observe how this has changed in terms of groundcover density and species composition, as well as the weed occurrence in the solar farm area.

Auditor response: *It is considered outside the audit scope for the auditor to measure groundcover density and species composition as these require long term monitoring programs to be meaningful. As previously stated, based on visual observations of the site as assessed at the time of the Construction IEA (following a period of intense drought) and at the time of this Operational IEA (following 2 years of high rainfall) it is evident that vegetative ground cover has vastly improved, both in density (coverage) and apparent diversity.*

Overall the implementation of the Biodiversity Management Plan is considered non-compliant with the requirements of CoA s3.11 with the following relevant deficiencies noted:

- *No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3).*
- *No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3).*
- *No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3).*
- *No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3).*
- Associated with this is how the site has been managed to ensure groundcover is maximised with the more desirable species i.e., perennial grasses. The land management over this time is useful to describe, and the measures used to ensure grass species persistence and weed control have been considered. Other management such as the application of soil ameliorants, fertiliser etc should also be included.

Auditor response: *Land management practices reported to the auditor have included topsoil salvage and re-use, re-seeding and mowing / slashing. The following Regeneration Seed Mix was reportedly utilised for pasture rehabilitation: Regen Blend – Solar Farm Label No. 30600 including Tetila 20%, Wimmera 20%, Origin 20%, Dalkeith 20% and Cavalier 20%. No application of soil ameliorants or fertilisers were reported to the auditor. Some weed spraying has reportedly taken place; however details of application was not recorded or records have not been maintained.*

Overall the implementation of the Biodiversity Management Plan is considered non-compliant with the requirements of CoA s3.11 with the following relevant deficiencies noted:

- *No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3).*
- *No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3).*
- *No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3).*
- *No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3).*
- *If applied, there is no record of the Pesticide Application Record being completed (BMP s7.5.1).*
- *The regeneration seed mix reportedly utilised for pasture rehabilitation is inconsistent with the target to established perennial native pasture species under solar panels (BMP, Appendix A – Ground Cover Management Plan).*

- Lastly the climatic conditions between audit periods should form part of setting the context for the audit.

Auditor response: Climatic conditions have no doubt been beneficial to the overall success of groundcover rehabilitation, including both desirable (native and non-native pastures) and non-desirable (weed) species. No formal climate assessment was undertaken; however a general observation is that the Construction IEA in February 2020 followed a period of intense drought and this operational IEA follows a 2-year period of high rainfall, including record flooding across wide areas of the central west. Visually it appears that vegetative ground cover has improved, both in density (coverage) and apparent diversity, across the project.

3.3 NSW Department of Planning and Environment: Water

Tim Baker, Senior Project Officer, Water Assessments of NSW DPIE: Water provided a written response dated 11 July 2022 requesting the following:

- That the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the audit scope:

- Condition D21 – A Stormwater Plan is prepared, approved and implemented.

Auditor response: Assessed as compliant under CoA S3.21 Stormwater Drainage.

- Condition D22(a and b)– sediment and erosion controls are in accordance with relevant guidelines.

Auditor response: Assessed as compliant under CoA S3.23 Operating Conditions.

- Condition D22(c) – works within waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012).

Auditor response: Assessed as compliant under CoA S3.23 Operating Conditions.

- Any water take at the site via storage, diversion, interception or extraction is authorised by a relevant Water Access Licence or exemption under the Water Management Act 2000 or Water Management (General) Regulation 2018.

Auditor response: No dams or water storage features have been established on site and as such the maximum harvestable right for surface water has not been exceeded. LSBP are currently obtaining the relevant water licence for the continued use of the original on site bore for the 20,000L tank. Construction water was purchased from Macquarie Stud Filling Station.

WSF is State Significant Development (SSD) and as such under the provisions of the EP&A Act the following authorisations are not required:

- a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,
- a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.

Auditor Recommendation: LSBP to obtain relevant water licence for the continued use of the original on site bore for the 20,000L tank.

3.4 Heritage NSW

Nicole Davis, Manager Assessments for Heritage NSW provided an email response dated 13 July 2022 stating that 'Heritage NSW has no comments on the project or audit scope - with respect to Aboriginal cultural heritage (ACH)'.

Michael Ellis, Manager Assessments for Heritage NSW provided an additional written response dated 01 August 2022 stating that 'Heritage NSW has no comments on the audit scope with respect to environmental heritage as the project site does not contain any items listed on the State Heritage Register'.

3.5 NSW DPIE - Biodiversity, Conservation and Science Directorate (BCS)

Samantha Wynn, Senior Team Leader Planning North West for BCS provided a written response dated 27 July 2022 suggesting the following:

BCS's main issues regarding the project that we suggest for review as part of the audit are:

- Confirmation that the vegetation buffers (landscape screening) at the locations identified in the figure in Appendix 1 of the project consent have been established.

Auditor response: Assessed as non-compliant under CoA S3.7 Landscaping – Vegetative Buffer. The mature vegetative buffer has not yet been established (Site 1), effectively maintained (Sites 2, 3 and 4). Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer as required by the condition.

- Confirmation that all offset requirements as set out in Condition 10 of Schedule 3 of the project consent have been retired.

Auditor response: Assessed as compliant under CoA S3.10 Biodiversity – Retirement of Credits. LSBP retired the required 70 ecosystem credits on 01 December 2021 which is within two years of commencing development in compliance with the requirements of this condition.

- Confirmation that the actions within the Biodiversity Management Plan are being implemented.

Auditor response: Assessed as non-compliant under CoA S3.11 Biodiversity Management Plan. The following deficiencies identified against the requirements of the Biodiversity Management Plan:

- No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3).
- No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3).
- No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3).
- No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3).
- If applied, there is no record of the Pesticide Application Record being completed (BMP s7.5.1).
- The regeneration seed mix reportedly utilised for pasture rehabilitation is inconsistent with the target to established perennial native pasture species under solar panels (BMP, Appendix A – Ground Cover Management Plan).

3.6 Fire & Rescue NSW

Superintendent John Hawes, Manager, Operational Liaison and Special Hazards Unit for Fire and Rescue NSW provided a written response dated 03 August 2022. Fire & Rescue NSW note that Condition 23 of the Development Consent for SSD-8573 requires that:

‘At least one month prior to the commencement of construction of the development, or unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study for the development, in consultation with Fire & Rescue NSW, and to the satisfaction of the Secretary.

The study must:

(a) be consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study Guidelines’; and

(b) report on the implementation status of the mitigation measures, listed in the EIS. Following the Secretary’s approval, the Applicant must implement the measures described in the Fire Safety Study.’

To date the applicant has not consulted with FRNSW in relation to the development of the fire safety study for the premises. A meeting was held on 3 July 2019 however this related to the Fire Management and Emergency Response Plan, not the Fire Safety Study for the premises.

Auditor response: *Assessed as not-triggered under CoA S3.23 Hazards – Fire Safety Study. LSBP received correspondence from NSW DPIE, dated 23 May 2019, regarding approval to defer the submission of the Fire Safety Study to until at least one month prior to commencement of construction of the battery storage facility. The battery storage facility has not been constructed and is not yet planned to be constructed. Subsequently the requirements of this condition had not been triggered at the time of this audit.*

3.7 NSW EPA

No response was received from NSW EPA.

3.8 Transport for NSW

No response was received from Transport for NSW.

3.9 Dubbo Regional Council

Dubbo Regional Council provided a written response, dated 16 August 2022, with the following key points extracted:

- **Schedule 2 Administrative Conditions**

WORK AS EXECUTED PLANS

7. The condition relates to the applicant submitting Work-As-Executed plans to the Department. Council has previously requested that the Work-As-Executed plans be forwarded to Council for our records. If these plans could be forwarded to Council that would be appreciated.

Auditor Response: *LSPB reported that Work-As-Executed Plans would be forwarded to council.*

NARRAWA HOMESTEAD

8. Council is unaware whether the Homestead has been repurposed as an operations and maintenance facility.

Auditor Response: *The on-site component of this audit was conducted within the Narrawa Homestead. Dubbo City Council issued correspondence dated 08 March 2021, issuing Final Occupation Certificate for Narrawa Homestead, convert dwelling into office building – as approved 05 March 2021.*

- **Schedule 3 Environmental Conditions – General**

LANDSCAPING

7. An inspection of the site has confirmed that the mature vegetation buffer (landscape screening) does not appear to have been established as per Appendix 1.

Auditor Response: *The auditor came to the same conclusion. Assessed as non-compliant under CoA S3.7 Landscaping Buffer. The following deficiencies identified against the requirements of this condition:*

- *Vegetative buffer plantings were observed in Site 2, 3, 4, and 5. No plantings were observed at Site 1. It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period.*
- *It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period.*
- *Overall, the mature vegetative buffer has not yet been established (Site 1), effectively maintained (Sites 2, 3 and 4).*
- *Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer.*

Auditor Recommendation: *The Proponent must establish and maintain the mature vegetation buffer as per the requirements of this condition.*

LANDSCAPING PLAN

8. It does not appear that the Applicant has prepared a detailed Landscaping Plan for the development.

Auditor Response: *LSBP prepared a Landscaping Plan (Version 2.4) prior to commencement of construction. This was assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020. The plan was developed in consultation with Council and was endorsed by NSW DPIE.*

The Landscaping Plan (Version 2.8) was revised to incorporate changes resulting from SSD 8572 Modification 2. The Landscaping plan includes control measures applicable to both construction and operation phases. It is not clear that Council was consulted prior to the revision of the Landscaping Plan, however NSW DPIE endorsed the revision.

BIODIVERSITY

10. Council is unaware whether the Applicant has retired the biodiversity credits as required by the condition. Council made enquiries with BCS and BCT but is yet to receive any response.

Auditor Response: *Addressed under CoA S3.10 Biodiversity – Retirement of Credits. LSBP retired the required 70 ecosystem credits on 01 December 2021 which is within two years of commencing development in compliance with the requirements of this condition.*

3.10 Wellington Valley Wiradjuri Aboriginal Corporation and Gallangabang Aboriginal Corporation

Bradley Bliss, representing both the Wellington Valley Wiradjuri Aboriginal Corporation and the Gallangabang Aboriginal Corporation was contact by telephone and reported that there were no issues with the Wellington Solar Farm project.

3.11 Wellington Local Aboriginal Land Council

The contacted Wellington Local Aboriginal Land Council (LALC) via telephone and email. No formal response was received, however the auditor did speak with a representative from the Wellington LALC.

4 Audit Findings

In accordance with Schedule 4, Condition 18 (e) of the Project Approval Mod 2, this section provides an assessment of the project's compliance with relevant requirements in the project approval, and any strategy, plans or programs required under the Project Approval.

4.1 Compliance Performance

This Operational IEA is considered to address the requirement of the scope of works to '*assess the environmental performance of the project*'. Section 5 of this report lists the conditions considered to be non-compliant, whilst the Audit Table (Appendix A) provides an assessment of the project's compliance with relevant requirements in the approval, and associated strategies, plans and programs required under the Project Approval.

Other than where noted in this audit, site environmental controls were observed as being implemented on site generally in accordance with the measures stipulated in the approved management plans and project approval. Refer to Section 5.1 of this audit report for non-conformances identified against environmental performance on this project.

4.2 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

It was reported by LSBP Head of Planning, Australian and New Zealand and S&W O&M Site Manager that the Project had not received any penalty notices or prosecutions at the time of this operational IEA, however show cause letters were issued to LSBP and S&W respectively in relation to one the five non-compliances raised in the 2020 Construction IEA.

In response to the Construction IEA Report, NSW DPIE informed LSBP (correspondence dated 20 May 2020) that four of the five reported non-compliances identified in the Construction IEA have been assessed in accordance with the Department's Compliance Policy and recorded the breaches with no further enforcement action. These being non-compliances raised against the requirements of:

1. Schedule 2, Condition 13
2. Schedule 3, Condition 2
3. Schedule 3, Condition 5
4. Schedule 3, Condition 22.

In relation to the reported non-compliance with Schedule 3, Condition 11, NSW DPIE investigated this further, including issuing informal requests for information to which LSBP responded. On 22 July 2020, NSW DPIE issued separate Show Cause Letters to LSBP and to S&W. The purpose of these letters was to give LSBP and to S&W the opportunity to make representations as to why the Department should not take formal enforcement action in relations to the alleged breach. Both LSBP and S&W cooperated with the requests contained within the notices and further information and evidence was provided for further consideration.

NSW DPIE issued correspondence (dated 25 August 2020) closing out the non-compliance investigation with the following findings:

- The Department intends to take no further action against Lightsource Development Services Australia Pty Ltd (**Lightsource**).
- The Department determined that Sterling and Wilson Solar Australia Pty Ltd ACN 632 960 680 (Sterling & Wilson) committed an offence against section 4.2(1)(b) of the Environmental Planning and Assessment Act 1979 (Act).
- Consequently, by failing to implement the ground disturbance permit protocols and engaging an ecologist to undertake a pre-clearing survey on 3 February 2020, Sterling & Wilson as the contractor for the Project, committed an offence against section 4.2(1)(b) of the Act, by carrying out development not in accordance with the Schedule 3 Condition 11 of development consent SSD 8573, by failing to implement the requirements of the Biodiversity Management Plan.

- The Department assessed the breach in accordance with the Department's Compliance Policy and on the 12 August 2020 issued Sterling & Wilson with a warning letter for the breach. A warning letter is an informal action taken where a breach has been established and the Department has determined that no formal enforcement action is warranted in the circumstances.
- The breach has been recorded against the Project. However, please be advised that the recording of the breach does not preclude the Department from taking alternative enforcement action, should it become apparent that an alternative response is more appropriate.

This matter is now considered closed.

No further matters were reported to or identified by auditor.

4.3 Summary of Environmental Incidents

The LSBP Site Project Manager and S&W Site Manager reported that no reportable environmental incidents had occurred on the project. Some minor spills of hydraulic fluid were recorded on the incident register. These minor spills were reportedly of low volume (less than 20L) and were contained on site, did not cause or threaten material harm to the environment and were immediately cleaned on site.

4.4 Summary of Environmental Complaints

LSBP is maintaining a feedback register and this was provided for review during the audit. No complaints had been received or recorded within the audit period in relation to matters pertaining to the project approval.

4.5 Review of Adequacy of Project Management Plans

The Development Approval requires the preparation, Secretary approval and implementation of a series of management plans and programs. The following management plans and programs required to be developed and approved for the Project were reviewed during this Audit:

- LSBP Environmental Management Strategy;
- Biodiversity Management Plan;
- Cultural Heritage Management Plan;
- Traffic Management Plan;
- Soil, Water, Stormwater Management Plan; and
- Landscaping Plan.
- Fire Management and Emergency Response Plan

As set out in Section 1.5.1, adequacy of the management plans has been determined by:

- review of the plan(s) against the relevant development of approval requirements;
- consideration that the plan(s) have been reviewed and approved by relevant agencies; and
- consideration of the environmental performance of the project with regard to the content and currency of the plan.

A technical review was not undertaken as this is assumed to have been done in the development of the plan, in consultation with relevant Agencies, and through the relevant approval process. A summary of the adequacy assessment of each strategy, plan or program is provided below.

4.5.1 Environmental Management Strategy

NGH Environmental has prepared and continues to update an Environmental Management Strategy (EMS) for the project. The current EMS (Version 3.2) was revised by NGH Environmental 09 April 2020, to incorporate changes resulting from SSD 8573 modification 2. The revised EMS was submitted to and endorsed by the Department.

The EMS sets out the strategic framework for environmental management on the project during construction and includes details on applicable legal and other requirements, roles and responsibilities for key environmental management personnel, internal and external communication, environmental incident response and processes for environmental monitoring and complaint management.

Most sections of the EMS refer almost exclusively to the construction phase of the project and the EMS has not been updated to incorporate the operational aspects of the project following completion of construction, as was the original intent of the document (Refer to S1.1 Purpose and Objectives of the EMS). For example, S.4.1 Structure and Responsibility and S.4.1.2 (Table 4-1) Environmental Management Team only refer to roles and responsibilities of the Engineering Procurement Contractor (EPC) and Construction Subcontractors, and does not yet refer to operational roles. As such, the following recommendation is made following the adequacy review of the EMS.

Auditor Recommendation: The EMS requires review and revision to reflect the operational phase of the development as it is currently focussed on construction controls.

4.5.2 Biodiversity Management Plan

NGH Environmental has prepared a Biodiversity Management Plan (BMP) for the project. The current BMP, Revision 3.6 dated 14 September 2020 was updated to incorporate changes resulting from SSD 8573 Modification 2. This revised plan was submitted to and endorsed by the Secretary. The purpose of this BMP is to provide a framework for the management of biodiversity issues during the construction and operation of the Project.

The BMP details mitigation and management measures to be implemented across the various phases of the project, including construction and operation. Relevant to the operational phase, the BMP sets out procedures for groundcover management, weed management and animal pest management.

The BMP is considered to address the relevant requirements of the Project Approval. Given the recent revision and endorsement of the BMP, it is considered adequate, up to date and relevant to the project, with no auditor recommendations identified, however it is noted that a non-conformance was identified during the audit with regard to insufficient implementation of the BMP (Refer to Section 5.1 of this report).

4.5.3 Cultural Heritage Management Plan

NGH Environmental has updated the Cultural Heritage Management Plan (CHMP) for the project including for relevance during operations. The CHMP was revised to incorporate changes under SSD 8573 Modification 2. The revised CHMP (Revision 1.8, dated 11 August 2020) endorsed by the Department 24 August 2020. As set out in Section 1 of the CHMP, the CHMP is applicable for all construction and operation works as approved for the Project.

The CHMP includes controls and requirements for the management of both aboriginal and historical heritage items, including aboriginal artefacts, the scar tree and the Narrawa Homestead. Aboriginal artefacts were salvaged prior to construction and subsequently reburied in an agreed location on site. The area where these artefacts were reburied remain as a no-go exclusion zone. The CHMP includes an unexpected finds procedure, which was successfully implemented during construction.

The CHMP is considered to adequately address the relevant requirements of the Project Approval, with no auditor recommendations identified. No environmental performance issues were identified in relation to cultural heritage.

4.5.4 Traffic Management Plan

A revised Traffic Management Plan was prepared and submitted to and approved by the Department to incorporate changes resulting from SSD 8573 Modification 2. The purpose of this TMP is to provide a framework for the management of traffic issues during construction and operation of the Project.

Operational activities are limited to site staff travelling to the site office and carrying out maintenance activities on solar farm infrastructure. Operational activities are confined to internal access roads and parking areas, consistent with the measures outlined within the approved Traffic Management Plan.

Given the minimal traffic generated during operations the plan is TMP is considered to adequately address the relevant requirements of the Project Approval, with no auditor recommendations identified.

4.5.5 Soil, Water, Stormwater Management Plan

NGH Environmental revised the Soil, Water and Stormwater Management Plan (SWSMP, Version 2.4, dated 09 April 2020) for the project to incorporate changes under SSD 8573 Modification 2. This revised SWSMP was submitted to and approved by the Department.

As with the overarching EMS, the SWSMP refers almost exclusively to the construction phase of the project. Section 8.3 of the SWSMP sets out requirements for regular monitoring and inspections that will be undertaken both during and following construction, this includes weekly waste inspection, post rainfall erosion and sediment inspections and as required machinery inspections.

The previous auditor recommendation raised in the 2020 Construction IEA (Reference WSF-IEA-2020-AR 8) has not been addressed, with no updated made to Section 8.3 of the SWSMP to provide further details as to what records will be maintained as evidence of monitoring and inspection processes, e.g. post rainfall inspections.

Auditor Recommendation: Review and revised the SWSMP to address operational requirements and include roles and responsibilities for the Operational Contractor.

Auditor Recommendation: Respond to and close out the previous auditor recommendation raised in the 2020 Construction IEA by updating Section 8.3 of the SWSMP to provide further details as to what records will be maintained as evidence of monitoring and inspection processes, e.g. post rainfall inspections etc.

4.5.6 Landscaping Plan

NGH Environmental revised the Landscaping Plan (LP) for the project to incorporate changes resulting from SSD 8573 Modification 2. The revised LP was submitted to and endorsed by the Department. The purpose of the LP is to describe measures to be taken to ensure that landscaping is planned, established and maintained to mitigate the visual impact for nearby receivers and road users of the operational solar farm infrastructure.

The Landscaping plan includes control measures applicable to both construction and operation phases, including a landscape planting monitoring program (Appendix C.4.5 of the LP) and a perimeter planting specification. The LP is considered to adequately address the relevant requirements of the Project Approval; however a non-conformance was identified during the audit with regard to implementation of the LP (Refer to Section 5.1 of this report) as the vegetation buffer was not planted and maintained in accordance with the plan.

4.5.7 Fire Management and Emergency Response Plan

NGH Environmental has prepared a Fire Management and Emergency Response Plan (FMERP) for the operational phase of the project (Version 2, dated 27 April 2020). As required by Schedule 3, Condition 26 of the Project Approval, Section 3 of the FMERP outlines the fire risks and controls.

The plan is developed for the operational phase of the project and is current. For example, Section 1.3 of the FREMP sets of that the Project has been approved to include an energy storage facility (ESF), however at this stage, the Project does not involve the installation or operation of the ESF.

Section 2.3 of the FREMP sets out details as to how the plan meets the requirements of the conditions of Consent and Statements of Commitments.

The FREMP is not considered to be the Fire Safety Study required under Schedule 3, Condition 23 of the Project Approval. DPIE has given approval for the Fire Safety Study to be deferred until at least one month prior to commencement of construction of the battery storage facility. At this time of this Operational IEA, the battery storage facility has not been constructed and is not yet planned to be constructed. As such the requirements of this condition were not yet triggered at the time of this audit.

Implementation of the plans was considered during the site inspection for this Operational IEA. An Asset Protection Zone was observed with minimum width of 10m around the solar farm buildings, substation and ESF, and around the outside perimeter of the solar array. A 20,000 litre water supply tank fitted with a 65mm Storz fitting is located nearby the Narrawa Homestead and adjacent to the internal access road. Emergency response procedures and emergency muster points were discussed during the Site Induction.

An Evacuation Protocol is provided within Appendix C of the FREMP, which outlines designated assembly points, transport plan and offsite refuge arrangements. An Emergency Response Diagram (Figure 5-1) outlines the project boundary, internal roads, primary & secondary evacuation routes, main site access location and emergency egress location. A Fire Emergency Procedure is including in Appendix D of the FREMP sets out requirements for responding fire situations on site.

The S&W O&M Site Manager reported that consultation in relation to the FREMP has recently commenced with both RFS and Fire & Rescue NSW and that the plan is essentially in draft pending further updates following their consultation, review and input.

Auditor Recommendation: That both RFS and Fire & Rescue NSW are further consulted with regard to the content of the Fire Management and Emergency Response Plan as there is little evidence to support this having occurred since the initial comments raised in response to the Environmental Impact Statement.

4.6 Status of Previous Audit Recommendations

The previous construction IEA conducted by J2M Systems in February 2020 identified that the project was generally compliant with their environmental management obligations under the Project Approval SSD 8573 Mod 1 at the time of that audit.

The 2020 Construction IEA identified the following findings:

- Five non-compliances against the five conditions of Project Approval; and
- Eight auditor recommendations for continual improvement.

These findings and the current status as assessed during this Operational IEA are outlined in Table 3 below:

Definition of refence:

NC	Non-compliant in 2020 Construction IEA, with Auditor Recommendation
AR	Compliant in 2020 Construction IEA, with Auditor Recommendation

Table 3: Status of 2020 Construction IEA recommendations

Reference:	Approval ID	Specific requirement	Independent Audit Findings and Recommendation	Status as assessed in 2023 Operational IEA.
WSF-IEA-2020 NC-01	CoA S2.13 & Revised Mitigation Measure B11.	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Auditor Recommendation: Implement measures outlined in the CEMP for management of plant and equipment, including but not limited to weed hygiene declarations, plant pre-mobilisation checklist and plant register.	Evidence was available to broadly demonstrate ongoing implementation of Plant Site Acceptance Checklist and Plant Register during the construction period. Operations: One bobcat is maintained on site for operational site services. A Plant Site Acceptance Checklist was completed for the Bobcat B3ZA12826 Model T590, including a check of the plant being clean, free of weeds and free of oil leaks / oil build up prior to use on site. Considered compliant and closed.
WSF-IEA-2020 NC-02	CoA S3.2	The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.	Auditor recommendation: Vehicle tracking register to be established, implemented and maintained to address this requirement. Site Delivery Driver Logs to be maintained to assist with capturing records of heavy vehicle movements each day.	No complaints regarding heavy vehicle movements were reported to, or identified by the auditor. Site Delivery Driver Logs were implemented during construction to record vehicle movements into and out of the project. It is noted that the records provided do not account for every day between commencement of construction to commencement of operations. Considered compliant and closed.
WSF-IEA-2020 NC-03	CoA S3.5 & Revised Mitigation Measure W5.	The Applicant must ensure: (a) the internal project site roadways are constructed as all-weather roadways (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are	Auditor recommendation: The applicant must construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as specified within the Biodiversity Management Plan (Section 7.6).	All internal project roadways are now constructed as all-weather roadways. Considered compliant and closed.

		in a clean condition and do not result in dirt being tracked onto the public road network.		
WSF-IEA-2020 NC-04	CoA S3.11	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and <p>(b) include a seasonally based program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Auditor Recommendation:</p> <p>Calculate and record the cumulative amount of vegetation cleared to ensure the Project is within approved limits.</p> <p>Implement all requirements of the BMP for any future pre-clearing and clearing surveys to identify habitat trees, ground disturbance permit and hollow-bearing tree removal procedure as applicable.</p>	<p>A vegetation removal tracking map was established and updated following the final clearing works undertaken on the project. This vegetation clearing was supervised by an ecologist in accordance with the requirements of the approved Biodiversity Management Plan.</p> <p>Considered compliant and closed.</p>
WSF-IEA-2020 NC-05	CoA S3.22 & Revised Mitigation Measure S2 and W8.	<p>The Applicant must:</p> <p>(a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;</p> <p>(b) ensure the solar panels and associated infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(c) ensure all works (including waterway crossings) are</p>	<p>Auditor Recommendation:</p> <p>Install and maintain adequate erosion and sediment controls across the site in accordance with the requirements of the <i>Managing Urban Stormwater: Soils and Construction Manual</i> (Landcom, 2004) to manage erosion and sediment risks.</p>	<p>Operational sediment and erosion controls were assessed during this audit and appear consistent with the requirements of <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004),</p> <p>Considered compliant and closed.</p>

		<p>conducted in accordance with the:</p> <ul style="list-style-type: none"> - <i>Guidelines for Controlled Activities on Waterfront Land (2012)</i>, or its latest version; and - <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004)</i>, or its latest version. 		
WSF-IEA-2020 AR1	CoA S3.6	<p>Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with the RMS and Council, and to the satisfaction of the Secretary. The plan must include:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for development-related traffic; (b) details of the measures that would be implemented to minimise traffic safety issues and disruption to users of 	<p>Auditor Recommendation: Continue to implement the approved TMP (Version 2.0) until such time that the Secretary endorses the revised TMP. Remove TMP Version 2.1 from website until approved.</p>	<p>A revised Traffic Management Plan (Version 2.6) was submitted to and approved by the Department to incorporate changes resulting from SSD 8573 Modification 2.</p> <p>This traffic management plan is available on the project website.</p> <p>Considered compliant and closed.</p>
WSF-IEA-2020 AR2	CoA S3.6	<p>Goolma Road during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> - performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; - temporary traffic controls, including detours and signage; - notifying the local community about project-related traffic impacts; 	<p>Auditor recommendation: Whilst a Driver's Code of Conduct has been prepared, there was limited evidence of it being communicated to drivers. It is recommended that the Drivers Code of Conduct be provided to and signed off by drivers during their site induction.</p>	<p>It was reported that the Driver's Code of Conduct was communicated to drivers during construction induction.</p> <p>On the basis that no complaints were reported during the construction period this finding is considered closed.</p>
WSF-IEA-2020 AR3	CoA S3.6	<ul style="list-style-type: none"> - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential for conflict with school buses, rail services and other motorists as far as practicable; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and (c) a driver's code of conduct that addresses: <ul style="list-style-type: none"> - travelling speeds; 	<p>Auditor recommendation: The posted onsite speed limit of 40km/h contradicts the 20km/h limit nominated in the TMP. Controls listed in the approved TMP are required to be implemented.</p>	<p>Posted speed limits are now consistent with the management plans.</p> <p>Considered compliant and closed.</p>

		<ul style="list-style-type: none"> - driver fatigue; - procedures to ensure that drivers adhere to the designated transport routes; and - procedures to ensure that drivers implement safe driving practices; and (d) a flood response plan detailing procedures and options for safe access to the site in the event of flooding. <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>		
WSF-IEA-2020 AR4	CoA S3.8	<p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with RMS, Council and surrounding landowners, to the satisfaction of the Secretary. The plan must include:</p> <ul style="list-style-type: none"> (a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) – (c); (b) include a program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>Auditor Recommendation: The version numbers for subsequent versions of all project management plans remain unchanged from the time of approval to ensure only approved plans are subject to implementation on site.</p>	<p>Version control within the management plans has been unchanged following approval of the revised plans. Considered compliant and closed.</p>
WSF-IEA-2020 AR5	CoA S3.11	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and 	<p>Auditor Recommendation: Undertake weed management and inspections as per Section 7.5.1 of the BMP, including a survey of weed distribution across the project site.</p>	<p>The implementation of the Biodiversity Management Plan is considered non-compliant with the requirements of CoA s3.11 with the following deficiencies identified against the requirements of the Biodiversity Management Plan:</p> <ul style="list-style-type: none"> - No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3). - No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3).

		<p>(b) include a seasonally based program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>		<p>- No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3).</p> <p>Non-compliance identified.</p>
WSF-IEA-2020 AR6	CoA S4.3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>...</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> - While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. - If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	<p>Auditor Recommendation: LSBP seek agreement of the Secretary to prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p>	<p>No evidence presented to support LSBP seeking agreement of the Secretary to prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Limited evidence provided to support consultation with relevant parties being undertaken prior to the revision of the relevant management plans.</p> <p>Note: Revised plans were submitted to and endorsed by the Secretary.</p> <p>Finding remains open and will be reproduced as an Auditor Recommendation in this report.</p>

WSF-IEA-2020 AR7	S&W CEMP	Auditor review of adequacy.	Auditor Recommendation: S&W's project team to thoroughly read and understand the implementation requirements of the CEMP and associated project environmental management plans to ensure ongoing implementation compliance, in particular the on-ground process and timing to adequately undertake all specified controls detailed in the management plans.	Refer to implementation non-compliances raised under CoA S3.8 Landscaping Plan and S3.11 Biodiversity Management Plan. Finding remains open and will be reproduced as an Auditor Recommendation in this report
WSF-IEA-2020 AR8	Soil, Water and Stormwater Management Plan	Auditor review of adequacy.	Auditor Recommendation: Provide further detail in the Section 8.3 of the Soil, Water and Stormwater Management Plan as to what records will be maintained (if any) as evidence of monitoring and inspection processes.	Section 8.3 of the Soil, Water and Stormwater Management Plan was not updated in the most recent revision since the 2020 Construction IEA. Finding remains open and will be reproduced as an Auditor Recommendation in this report

4.7 Actual verses Predicted Environmental Impacts

The following section provides a summary of actual vs. predicted impacts for the key environmental aspects identified in the Environmental Impact Statement (EIS) prepared by NGH Environmental, November 2017. This is a high-level summary of the predicated impacts outlined within the EIS as read and interpreted by the auditor at the time of this audit, as well as a general assessment of actual impacts in the opinion of the Auditor based on evidence of management plan implementation obtained during both the Construction IEA and this Operational IEA and of observations made during the site inspections for these IEAs.

The EIS outlined the following key environmental aspects:

- Biodiversity;
- Aboriginal heritage;
- Visual impact;
- Noise impact; and
- Historic heritage

This section also includes considerations for environmental impacts predicted within the modification application reports for Mod 1 and Mod 2. The project was in operational phase at the time of the audit.

4.7.1 Biodiversity Impacts

NGH prepared a Biodiversity Assessment Report (BAR) for the project and the results of the BAR are summarised within the EIS.

Predicted Impacts

As reported in the Construction IEA, the following provides a high-level summary the of predicated biodiversity impacts outlined in Section 7.1.6 of the EIS:

- Direct impact on three vegetation zones totalling 7.12 ha that are identified as endangered ecological communities (EEC), being:
 - 0.85 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
 - 1.81 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
 - 4.46 ha of White Box Grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion.
- In terms of the impacts on vegetation and the generation of ecosystem credits, the changes proposed in MOD 2 compared with the approved footprint are summarised as follows:
 - An overall additional impact of 0.02 ha of PCT 277 White Box Yellow Box Blakely's Red Gum woodland. This generates no credits;
 - An overall reduced impact of 6.90 ha of mapped Plant Community Type (PCT) 266 – White Box grassy woodland in the upper slopes sub-region of NSW South Western Slopes. Zones 2 and 4, together now generate 3 credits for the project. For Zones 3, 5 and 6, the net effect is zero credits;
 - An overall additional impact of 15.43 ha of exotic vegetation. This generates no credits.
- Habitat clearance for permanent and temporary construction facilities (e.g. solar infrastructure, transmission lines, compound sites, stockpile sites, access tracks). The consequences of this impact may include:
 - Direct loss of native flora and fauna habitat from clearing, including removal of hollow bearing trees for Superb Parrot and Corben's Long-eared Bat
 - Injury and mortality to fauna during clearing of fauna habitat
 - Introduction and spread of noxious weeds and pathogens
 - Disturbance to fallen timber, dead wood, bush rock and riparian vegetation.
- Risks for soil and water contamination; and
- Generation of excessive dust, light or noise.

Actual Impacts:

As described in section 4.5.2 above, a Biodiversity Management Plan (BMP) has been prepared for implementation on the project and was revised to incorporate changes under modification 2. As set out in the Modification Application (Mod 2), the changes to the development footprint resulted in an overall reduction in native vegetation being impacted and therefore a reduced credit requirement.

Works on site at the time of the site inspection for this operational IEA consistent of routine maintenance activities, including sediment erosion control, weed management and groundcover management (i.e. mowing and slashing). All construction activities including clearing of native vegetation and earthworks within the approved development area were complete.

A site inspection was undertaken and it appears that environmental exclusion zones, as set out in the Modification Application (Mod 2), were established around project boundaries and no-go areas.

The non-compliance identified during the Construction IEA with regard to the implementation of the BMP (Refer to Section 4.1 - 2020-IEA-NC-04) was reviewed by the Department, actioned by the Proponent and subsequently closed, Refer to Sections 4.2 and 4.6 above.

A vegetation removal tracking map was established and updated following the final clearing works undertaken on the project. This vegetation clearing was supervised by an ecologist in accordance with the requirements of the approved Biodiversity Management Plan. The Vegetation Removal Tracking Map (dated 30 June 2020) indicates that clearing works were below the approved allowances.

Re-use of soil resources was difficult to determine, however on the basis that groundcover has re-established across the site it is considered compliant. Site inspections were undertaken and confirmed

the re-use of coarse woody debris in management zones 3 and 4 generally in a manner consistent with the required set out in the Biodiversity Management Plan.

4.7.2 Aboriginal Heritage Impacts

NGH prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR) to provide an assessment of the Aboriginal cultural values associated with the proposal site and to assess the cultural and scientific significance of any Aboriginal heritage sites recorded. The results of the ACHAR are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated Aboriginal cultural heritage impacts outlined in Section 7.2.4 of the EIS:

- The impact to the scientific value of the site is considered low.
- Salvage of the following isolated finds (IF):
 - WSF IF3 – 8 and WSF IF10 - 15
- Salvage of the following artefact scatters (AS):
 - WSF AS1 – 8 and WSF AS10
- Further archaeological research should be undertaken in the form of excavations in order to establish the presence or absence sub surface deposits at the following locations:
 - PAD 1
 - PAD 2.

Actual Impacts:

As described in section 3.5.5 above, a Cultural Heritage Management Plan (CHMP) has been prepared and implemented on the project. Exclusion zones were established and observed around known Aboriginal heritage sites, including exclusion fencing around the scar tree. As reported in the 2020 Construction IEA, NGH Environmental successfully undertook surface artefact collections and salvage operations. The salvaged items have since been reburied back on site, with the final reburial involve a smoking ceremony undertaken with Wellington Local Aboriginal Land Council representatives. AHIMS site cards were finalised for the locations.

It was reported and observed that no works have occurred outside the approved development footprint. Unexpected finds protocol has been implemented on the site, including two unexpected find reports, with once being an artefact successfully relocated.

Based on the above, and on the basis of the management of the unexpected find, including initial identification, cease work and reporting, the project is considered consistent with the predicated impacts identified by the EIS.

4.7.3 Visual Impacts

NGH Environmental completed a Visual Impact Assessment (VIA) to provide an assessment of the visual impacts associated with the project. The results of the VIA are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated visual impacts outlined in Section 7.3.3 of the EIS:

- No high impact view locations were identified for the project;
- Four medium impact view locations were identified that required mitigation (vegetative screening);
- Further investigation required for five specific residential receivers (R1, R2, R3, R4 and R8); and
- Five low visual impact view locations, with no mitigation required.

Actual Impacts

As described in section 4.5.6 above, a Landscaping Plan (LP) has been prepared for the project to address visual impacts of the project. The proposed mature vegetative buffer has not yet been established (Site 1) or effectively maintained (Sites 2, 3 and 4). No complaints relating to visual impacts had been received on the project at the time of the audit. Whilst a vegetative buffer has not yet been fully established, the visual impacts of the project are considered consistent with predicted impacts.

The following non-conformance was raised under CoC s3.7:

- Whilst vegetative buffer plantings observed in Site 5, Site 4, along Site 3, and Site 2, there were no plantings were observed at Site 1. It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period. Overall, the mature vegetative buffer has not yet been established (Site 1) and/or effectively maintained (Sites 2, 3 and 4). Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer.

Auditor Recommendation: The Proponent must establish and maintain the mature vegetation buffer as per the requirements of this condition.

4.7.4 Noise Impacts

Renzo Tonin and Associates undertook a construction and operational noise and vibration assessment (CONVA) to provide an assessment of the noise and vibration impacts associated with the project. The results of the CONVA are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated construction noise and vibration impacts outlined in Section 7.4.4 and 7.4.6 of the EIS:

- Construction noise management levels will be exceeded when the construction works are conducted at closest proximity to two receivers (R1 and R7);
- All receivers are predicted to be less than the highly noise affected level of 75dB(A);
- Structural damage due to vibration is not expected;
- The potential for adverse comment to vibration impacts was determined to be very low. No vibration mitigation measures are required; and
- Traffic noise levels would not adversely contribute to the existing traffic noise levels at the most affected residences along the surrounding roads and require no specific mitigation.

Actual Impacts:

No noise or vibration monitoring is required for the project, except following a noise or vibration related complaint. There have been no specific noise or vibration related complaints within the audit period. The auditor did not identify any noise or vibration related issues during the audit site inspection. Noise is minimal during operations and unlikely to be audible at the nearest receiver. The project is considered to be consistent with the predicted noise and vibration impacts.

4.7.5 Historic heritage impacts

NGH completed a desktop study and site inspection to identify any historic heritage (Non-indigenous) items or places within the project site and surrounding landscape. The results of the investigation are summarised within the EIS.

Predicted Impacts

The following provides a high level summary the of predicated heritage impacts outlined in Section 7.5.7 of the EIS:

- One (1) heritage site is located within the proposal site: Narrawa Homestead; and
- It is proposed to use the Narrawa Homestead as the Operations and Maintenance (O&M) building for the solar farm.

Actual Impacts:

The auditor did not observe any damage or changes to existing plantings around the Narrawa Homestead and its driveway. The Narrawa Homestead has been repurposed as an operations and maintenance facility in accordance with the conditions of Project Approval and consistent with the predicted impacts of the EIS.

4.8 Outcomes of Audit Site Inspection

Site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site. These inspections focused on a general inspection of the solar farm, including full perimeter road, key environmental and heritage exclusion zones and the Narrawa Homestead. The auditor was escorted by representatives of LSBP and S&W representatives during the site inspections, however was able to direct where the inspection went, including stopping at locations of interest. Photos from the site inspection are included in Appendix E of this report.

The weather was dry and approximately 25°C, with light winds. Recent rains on site and within in the broader region has resulted in increased groundcover and reduced potential for dust generation. The site inspections consisted of a drive across the site using a light vehicle and also included walking to some specific locations, including Aboriginal heritage locations and areas of ecological significance.

The solar farm is fully operational and work activities on site at the time of this inspection were limited to operational inspection and maintenance. The following provides a summary of observations made during the audit site inspection:

- Site is fully operational;
- All internal access roads are constructed as all-weather access roads.
- Erosion and sediment controls remain installed and maintained in key risk areas.
- A good level of groundcover was observed across the site, including both native and non-native species.
- Weeds were observed on site including in areas both inside and outside the main perimeter fence. Areas of the site outside the perimeter fence, but within the project boundary do not appear to have been managed.
- Groundcover within the site appears to have been managed through mowing, slashing and grazing by sheep.
- Sheep were observed grazing in many areas on site, mainly in areas underneath the solar array.
- Whilst vegetative buffer plantings observed in Site 5, Site 4, along Site 3, and Site 2, there were no plantings were observed at Site 1
- It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period.
- The mature vegetative buffer has not yet been established (Site 1) and/or effectively maintained (Sites 2, 3 and 4).
- Aboriginal heritage areas and environmental exclusion zones are communicated during induction, clearly delineated on site plans and do not appear to have been disturbed.
- Narrawa homestead has been repurposed into the operational and maintenance facility.,
- The former construction site compound remains as a hardstand area for storage of equipment, additional solar panels and materials for recycling or disposal.

Recommendations relating to the findings are included in the Audit Table and in Section 4.2 of this report.

4.9 Key Improvements

The following key improvements were identified during the Operational IEA:

- All-weather access roads have been constructed, including rock checks within draining lines.
- Stabilised rock placed where surface flows cross internal roadways.
- Sediment and erosion controls, including sediment fencing and rock checks were observed installed and maintained in key risk areas and within onsite drainage lines.
- Vegetation clearing tracking register established and updated.

4.10 Key Strengths

The auditor identified the following key strengths during the audit period:

- Narrawa Homestead successfully repurposed as an operation and maintenance facility.
- No-go exclusion zones remain established and are communicated at site induction.
- Small, knowledgeable and positive operational team.
- The riparian buffer along Wuuluman Creek remains an exclusion zone.
- Positive culture of ongoing environmental reporting throughout construction, as demonstrated by the implementation of the unexpected finds protocol for actual and suspected Aboriginal heritage items; and

5 Summary of Audit Non Compliances and Recommendations

The findings of this Operational IEA compliance assessment of the Project Approval are presented in this section. The audit table included as Appendix A provides detailed compliance assessments, including verification evidence. The compliance assessment was based on visual observations of Project activities being undertaken on site during site inspections, interviews with site personnel and interpretation of the documentation provided to the auditor during this Operational IEA. Opinions expressed in the compliance assessment apply to the activities, as they existed at the time of the IEA and from information provided by site personnel. Variations to this information of which the auditor is not aware and did not have the opportunity to assess, have not been considered in this compliance assessment.

Non-compliant requirements identified during the audit are provided in Section 5.1 below. Refer to Appendix A for the complete audit findings and further context within regard to each condition of the Project Approval. Auditor recommendations and opportunities for improvement identified during this Operational IEA are provided in Section 5.2.

5.1 Non-Compliances

The IEA compliance assessment determined that the following specific elements of the conditions or requirements have not been complied with within the scope of the audit: Project Approval SSD 8573 Mod 2.

Table 4: Non-compliances and Recommendations.

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
Project Approval SSD 8573			
2023 OIEA NC 1	CoA S2.9	<p>Notification of Department Prior to the commencement of construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>LSBP notified the department of commencement of operations on 17 January 2023, with operations commencing on 23 December 2022. LSBP did not notify the Department prior the cessation of construction phase and commencement of the operational phase of the development.</p> <p>The correspondence from the Department states the following:</p> <p>“The department notes that the notification was not submitted prior to the commencement of operations. The department has assessed this non-compliance in accordance with the Departments Compliance Policy and in this instance has determined to record the non-compliance. The recording of this non-compliance does not preclude the department from taking alternate action in the future should it become apparent a more appropriate action is deemed necessary.</p> <p>As the non-compliance has been identified and recorded by the Department no recommendations are provided by the auditor.</p> <p>Auditor Recommendation: Nil.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
2023 OIEA NC 2	CoA S3.7	<p>Landscaping Vegetation buffer</p> <p>The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 of the Conditions of Consent to the satisfaction of the Secretary. This vegetation buffer must:</p> <p>(a) consist of a variety of vegetation species that are endemic to the area;</p> <p>(b) within 3 years of the commencement of construction be effective at screening view of the solar panels and ancillary infrastructure (excluding the overhead power lines) on site from surrounding residences; and</p> <p>(c) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise.</p>	<p>Non-Compliant</p> <p>Whilst vegetative buffer plantings observed in Site 5, Site 4, along Site 3, and Site 2, there were no plantings were observed at Site 1.</p> <p>It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period.</p> <p>Overall, The mature vegetative buffer has not yet been established (Site 1), effectively maintained (Sites 2, 3 and 4).</p> <p>Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer.</p> <p>Auditor Recommendation: The Proponent must establish and maintain the mature vegetation buffer as per the requirements of this condition.</p>
2023 OIEA NC 3	CoA S3.8	<p>Landscaping Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with RMS, Council and surrounding landowners, to the satisfaction of the Secretary. The plan must include:</p> <p>(a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) - (c);</p> <p>(b) include a program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>Non-Compliant</p> <p>The implementation of the Landscaping plan is considered non-compliant with the following deficiencies identified during the audit:</p> <ul style="list-style-type: none"> - No evidence of monthly monitoring and report since planting (Landscape Plan, Appendix C.4.5) - No evidence of weed control at Sites 1 and 2. - No evidence of supplementary plantings to achieve 90% success rate. - Weeds were observed in numerous locations across the site and the Construction inspections and the recently completed S&W Maintenance Checklists for operations failed to effectively identify weed management issues on site, including weed locations and necessary management actions (Landscape Plan, Appendix C.4.3). - If applied, there is no record of the Pesticide Application Record being completed (Landscape Plan, Appendix C.4.1 and C.4.3) <p>Auditor Recommendation: The Proponent must implement the measures outlined within the Landscaping plan to achieve planting success and to better manage weed prevalence on site.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
2023 OIEA NC 4	CoA S3.11	<p>Biodiversity Management Plan Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and <p>(b) include a seasonally based program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Non-compliant:</p> <p>The implementation of the Biodiversity Management Plan is considered non-compliant with the requirements of CoA s3.11 with the following deficiencies identified against the requirements of the Biodiversity Management Plan:</p> <ul style="list-style-type: none"> - No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3). - No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3). - No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3). - No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3). - If applied, there is no record of the Pesticide Application Record being completed (BMP s7.5.1). - The regeneration seed mix reportedly utilised for pasture rehabilitation is inconsistent with the target to established perennial native pasture species under solar panels (BMP, Appendix A – Ground Cover Management Plan). <p>Auditor Recommendation: The Proponent must implement the measures outlined within the Biodiversity Management plan to better manage weed prevalence on site and to maximise the establishment of perennial native pasture species under solar panels.</p>
EIS Revised Mitigation Measures			
2023 OIEA NC 5	F3	<p>An Emergency Response Plan incorporating a Flood Response Plan would be prepared prior to construction covering all phases of the project. The plan would:</p> <ul style="list-style-type: none"> ○ Detail who would be responsible for monitoring the flood threat and how this is to be done. ○ Detail specific response measures to ensure site safety and environmental protection. ○ Outline a process for removing any necessary equipment and 	<p>The revised Fire Management and Emergency Management Plan no longer includes a procedure for flood response.</p> <p>Auditor Recommendation: Revise and update the existing Fire Management and Emergency Response Plan to include Flood Response Plan for the remaining phases of the project.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
		<p>materials offsite and out of flood risk areas (i.e rotate array modules to provide maximum clearance of the predicted flood level).</p> <ul style="list-style-type: none"> ○ Consideration of site access in the event that some tracks become flooded. ○ Establish an evacuation point. ○ Define communications protocols with emergency services agencies. 	

5.2 Recommendations and Opportunities for improvement

Auditor identified recommendations where conditions were assessed as compliant with identified opportunities for continuous improvements.

Table 5: Opportunities for Improvement and Recommendations

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
2023 OIEA AR1	CoA S4.1	<p>Environmental Management Environmental Management Strategy Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:</p> <ul style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> - keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise; - respond to any non-compliance; - respond to emergencies; and (e) include: <ul style="list-style-type: none"> - copies of any plans approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>Auditor Recommendation: The EMS requires review and revision to reflect the operational phase of the development as it is currently focussed on construction controls.</p>

2023 OIEA AR2	CoA S3.21	Adequacy review of management plan.	Auditor Recommendation: Review and revised the SWSMP to address operational requirements and include roles and responsibilities for the Operational Contractor.
2023 OIEA AR3	CoA S3.26	Fire Management and Emergency Response Plan Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times.	Auditor Recommendation: That both RFS and Fire & Rescue NSW are further consulted with regard to the content of the Fire Management and Emergency Response Plan as there is little evidence to support this having occurred since the initial comments raised in response to the Environmental Impact Statement.
2023 OIEA AR4	EIS Mitigation Measures W1	The Water Access Licence (WAL) would be obtained, should on site ground water sources be used.	Auditor Recommendation: LSBP to obtain relevant water licence for the continued use of the original on site bore for the 20,000L tank.
WSF- IEA- 2020 AR6	CoA S4.3	With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. ... To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Notes: - While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. - If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.	Auditor Recommendation: LSBP seek agreement of the Secretary to prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Note: This finding remains open from the 2020 Construction IEA and is re-listed in this Operational IEA.
WSF- IEA- 2020 AR7	S&W CEMP	Auditor review of adequacy.	Auditor Recommendation: S&W's project team to thoroughly read and understand the implementation requirements of the CEMP and associated project environmental management plans to ensure ongoing implementation compliance, in particular the on-ground process and timing to adequately undertake all specified controls detailed in the management plans.

			<p>Refer to implementation non-compliances raised under CoA S3.8 Landscaping Plan and S3.11 Biodiversity Management Plan.</p> <p>Finding remains open and will be reproduced as an Auditor Recommendation in this report</p>
WSF-IEA-2020 AR8	Soil, Water and Stormwater Management Plan	Auditor review of adequacy.	<p>Auditor Recommendation: Provide further detail in the Section 8.3 of the Soil, Water and Stormwater Management Plan as to what records will be maintained (if any) as evidence of monitoring and inspection processes.</p> <p>Note: This finding remains open from the 2020 Construction IEA and is re-listed in this Operational IEA.</p>

6 Conclusion

This Operational IEA of WSF determined that the project is generally compliant with their environmental management obligations under the Project Approval SSD 8573 Mod 2 and that the actual impacts of the project appear consistent with those predicted in the Environmental Impact Statement.

This audit identified:

- Four (4) non-compliances against the four (4) conditions of Project Approval;
- One (1) non-compliance against one (1) proposed mitigation measure within the EIS;
- Four (4) new auditor recommendations for continual improvement; and
- Three (3) outstanding auditor recommendations for continual improvement which remain open from the construction IEA.

J2M Systems have recommended actions to address each of the non-conformance and opportunities for improvement identified. These actions are summarised in Section 4 of this Audit Report.

7 Limitations

The findings of this audit are based upon visual observations of the site, interviews with site personnel and our interpretation of documentation made available by Project personnel. Opinions presented herein apply to the site as observed at the times of the inspections and from the Auditors interpretation of documentation and information provided by Project personnel. Any changes to this information of which the Auditor is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

J2M Systems have taken due care to consider all reasonably available information provided during the undertaking of this audit and have taken this information to represent a fair and reasonable characterisation of the environmental status of the site, but recognise that any site assessment program is necessarily limited in scope and true site conditions may differ from those inferred from the available data.

8 Appendixes

The following appendixes are attached to this document:

- Appendix A: Independent Audit Table
- Appendix B: Planning Secretary Audit Team Agreement
- Appendix C: Consultation
- Appendix D: Independent Audit Declaration Form
- Appendix E Site Inspection Photographs.

Appendix A: Independent Audit Table

Appendix A: Independent Audit Table

Definition of compliance status:

C	Compliant
NT	Not triggered
NC	Non-compliant

Note: This is the operational IEA and seeks to address requirements relating to the operational phase of the project. Compliance requirements relating to pre-construction and construction generally were addressed by the Construction IEA undertaken by J2M Systems, February 2020.

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2				
CoA S2.1	Obligation to minimise harm to the environment In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Refer to evidence collected throughout this audit table. Discussions with: - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. Individual block hand over checklists and inspection and test plans, including: Civil: GCo Solar and S&W Inspection and Test plan for Trenching and Backfill. GCo Solar and S&W Inspection and Test plan for Excavation and Backfill GCo Solar and S&W Environmental Control Check Sheet Piling RL Solar Constructions Inspection and Test Plan for installation of piles. ITPs also available for Mechanical, Structural and electrical. Sample of site inspections checklists.	On the basis that no material harm incidents have occurred, the project is considered compliant with the requirements of this condition for the operational phase of the project to date.	C

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
CoA S2.2	Terms of Consent The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Refer to evidence collected throughout this Audit Table. Site inspection undertaken 28 Feb – 02 March 2023. This checklist includes an assessment of compliance against the mitigation measures proposed in the EIS. This checklist includes an assessment of compliance against each condition of consent.	With exception to the non-conformances and auditor recommendations identified by this audit, works were generally considered to be compliant with the EIS and conditions of consent. The audit table identifies the specific non-compliant findings identified against the individual condition of consent and against the mitigation measures outlined in the IEA.	C
CoA S2.3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	The auditor did not identify any inconsistency during the audit and no inconsistencies were reported to the auditor during interviews with the Project team.	No inconsistency identified or reported.	NT
CoA S2.4	The Applicant must comply with any requirements of the Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents.	Evidence of consultation with the Department regarding development of the management plans is included as an appendix to the individual management plans. Correspondence between NSW DPIE and LSBP, dated 20 May 2020, regarding approval of the Construction IEA and investigation into non-conformance identified under Schedule 3, Condition. Correspondence between NSW DPIE and LSBP, dated 24 Aug 2020, closing out the IEA and non-compliance.	No outstanding actions were identified during the audit. Project management plans have been revised, resubmitted and approved for modifications of the Project Approval.	C
CoA S2.5	Final layout plans Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure. Note: if the construction of the development is to be staged, then the provision of these plans may be staged.	Assessed in the Construction IEA conducted by J2M Systems in 2020.	Not triggered by operational requirements.	NT
CoA S2.6	Upgrading of solar panels and ancillary infrastructure Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	Discussion with: <ul style="list-style-type: none"> - S&W Operations Manager. - LSBP Asset Manager - S&W O&M Site Manager. 	Operations commenced 23 December 2022. The auditor was advised that no upgrade works have taken place.	NT

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
CoA S2.7	Work as executed plans Prior to the commencement of operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department.	NSW DPIE correspondence dated 24 Jan 2023 (SSD-8573-PA-20) re: notification of the commencement of operation and works as executed plans.	Operation of the solar farm commenced on 23 December 2022. Works as executed plans were provided to NSW DPIE on 17 January 2023. Whilst the plans were not submitted prior to the commencement of operations, refer to NC CoA s2.9, NSW DPIE correspondence 24 January 2023 states that work as executed plan for the project were provided as part of the notification of commencement of operations and 'in accordance with Condition 7 of Schedule 2 of the consent' and as such is considered to comply.	C
CoA S2.8	Narrawa Homestead Prior to commencing operations, the Applicant must repurpose the Narrawa Homestead as an operations and maintenance facility, unless the Secretary agrees otherwise.	On site component of this audit was conducted within the Narrawa Homestead. Correspondence from Dubbo City Council, 08 March 2021, regarding Final Occupation Certificate for Narrawa Homestead, convert dwelling into office building – approved 05 March 2021. Statement of Heritage Impact – Narrawa Homestead, prepared by NGH Environmental, October 2019. Narrawa Homestead addendum Statement of Heritage Impact, prepared by NGH Environmental, February 2020.	Current operations and maintenance work undertaken from Narrawa Homestead including: <ul style="list-style-type: none"> - Remote monitoring of the plant. - Main control room - SCADA room - Solar farm reception desk - Security room - Office - Amenities 	C
CoA S2.9	Notification of Department Prior to the commencement of construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the	Construction notification assessed in Construction IEA by J2M Systems, February 2020. Operation notification: NSW DPIE correspondence dated 24 Jan 2023 to Lightsoure Development Services Australia re: notification of the commencement of operation and works as executed plans.	Non-Compliant LSBP notified the department of commencement of operations on 17 January 2023, with operations commencing on 23 December 2022. LSBP did not notify the Department prior the cessation of construction phase and commencement of the operational phase of the development. The correspondence from the Department	NC

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	relevant stage.		<p>states the following:</p> <p>“The department notes that the notification was not submitted prior to the commencement of operations. The department has assessed this non-compliance in accordance with the Departments Compliance Policy and in this instance has determined to record the non-compliance. The recording of this non-compliance does not preclude the department from taking alternate action in the future should it become apparent a more appropriate action is deemed necessary.</p> <p>As the non-compliance has been identified and recorded by the Department no recommendations are provided by the auditor.</p> <p>Upgrading or decommissioning works have not been undertaken at the time of this audit and as such, the requirements relating to these phases have not yet been triggered.</p>	
CoA S2.10	<p>Structural adequacy</p> <p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p>Notes:</p> <ul style="list-style-type: none"> - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. <p>Spares Shed: Correspondence from Professional Certification Group, dated 09 June 2021, regarding issue of Occupation Certification for the warehouse (spares shed). This confirms the building suitable for occupation or use in accordance with its classification under the Building Code of Australia.</p> <p>Narrawa Homestead: Correspondence from Dubbo City Council, 08 March 2021, regarding Final Occupation</p>	<p>LSBP have obtained Occupation Certificates for the use of Narrawa Homestead and the newly constructed Spares Shed in compliance with the requirements of this condition.</p>	C

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Certificate for Narrawa Homestead, convert dwelling into office building – approved 05 March 2021.		
CoA S2.11	Demolition The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	Site photographs of demolition of abattoir. Safe Work NSW – notice of intent to commence demolition work 10/03/2020. DEMEX Safe Work Method Statement (SWMS) for Demolition of structure including removal of fragmented asbestos cement sheeting.	DEMEX Pty Ltd as a licenced demolition contractor was engaged and undertook demolition of the abattoir. A safe work method statement was prepared for the works. Works were undertaken by mechanical demolition using mobile plant (excavator). Demolition works were not inspected by the auditor. No incidents were reported. Demolition works are considered to comply.	C
CoA S2.12	Protection of public infrastructure Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. The condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	Discussions with: <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - S&W National HSE Manager. - LSBP Asset Manager. Site inspection undertaken 30 February – 02 March 2023. S&W Incident investigation report, dated 30 Jan 2020, assessed in Construction IEA (J2M Systems, February 2020).	LSBP and S&W reported that there were no incidents / issues in regard to public infrastructure within this audit period.	C
CoA S2.13	Operation of plant and equipment The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	The Construction IEA conducted by J2M Systems in February 2020 reported this as a non-compliance due to inconsistent implementation of plant on-boarding processes, with the following recommendation: Implement measures outlined in the CEMP for management of plant and equipment, including but not limited to weed hygiene declarations, plant pre-mobilisation checklist and plant register. Site inspection 30 February – 02 March 2023. Plant Site Acceptance Checklist for the Bobcat	Construction: This current audit relates to the operation of the project. Conditions related to construction were assessed as non-compliant in the Construction IEA conducted by J2M Systems in February 2020. S&W acknowledged this non-compliance and effective corrective action was taken, with evidence available to broadly demonstrate ongoing implementation of Plant Site	C

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>B3ZA12826 Model T590. Check includes questions on plant being clean, free of weeds and free of oil leaks / oil build up.</p> <p>Evidence to demonstrate implementation of Plant Site Acceptance Checklists on plant during construction to close out non-compliance identified in Construction IEA.</p> <p>S&W Plant Register.</p>	<p>Acceptance Checklist and Plant Register during the construction period.</p> <p>Operations:</p> <p>One bobcat is maintained on site for operational site services. A Plant Site Acceptance Checklist was completed for the Bobcat B3ZA12826 Model T590, including a check of the plant being clean, free of weeds and free of oil leaks / oil build up prior to use on site.</p> <p>Considered compliant.</p>	
CoA S2.14	<p>Batteries</p> <p>Battery Storage Restrictions</p> <p>The capacity of the battery energy storage system must not exceed 25 MW / 100 MW hours.</p> <p><i>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage system in the future.</i></p>	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. 	<p>Battery energy storage system has not been constructed.</p>	NT
Schedule 3				
CoA S3.1	<p>Transport</p> <p>Heavy vehicle restrictions</p> <p>The Applicant must ensure that the:</p> <p>(a) development does not generate more than:</p> <ul style="list-style-type: none"> - 100 heavy vehicle movements a day during construction, upgrading or decommissioning; and - 5 heavy vehicle movement a day during operations; and - 2 over-dimensional vehicle movements during construction, upgrading or decommissioning; <p>on the public road network; and</p> <p>(b) length of any heavy vehicles used for the development does not exceed 25 metres, unless the Secretary agrees otherwise.</p>	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - S&W National HSE Manager. - LSBP Asset Manager. <p>Site inspection undertaken 30 February – 02 March 2023.</p> <p>Site Delivery Driver Log.</p> <p>Truck Registers May 2020– Aug 2021.</p> <p>The Construction IEA conducted by J2M Systems in February 2020 reported this as compliant.</p>	<p>As reported in the Construction IEA, the Security Office at the site access point held responsibility for recording all heavy vehicle movements using the Site Delivery Driver Log. This process appears to have been implemented throughout construction.</p> <p>It was reported to the Auditor that vehicle movements did not exceed the requirements set out by this condition.</p> <p>One over-dimensional vehicle movement was reported, for delivery of the electrical transformer to the TransGrid Substation.</p> <p>It was reported that the length of all heavy vehicles used on the project have not</p>	C

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			exceeded 25 metres. There are minimal heavy vehicle movements during operations.	
CoA S3.2	The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - S&W National HSE Manager. - LSBP Asset Manager. <p>Site inspection undertaken 30 February – 02 March 2023.</p> <p>Site Delivery Driver Logs (Truck Registers) May 2020– Aug 2021.</p> <p>The Construction IEA conducted by J2M Systems in February 2020 reported this as non-complaint due to a lack of records relating to vehicle movements. The following recommendation was recorded in the IEA: <i>Vehicle tracking register to be established, implemented and maintained to address this requirement. Site Delivery Driver Logs to be maintained to assist with capturing records of heavy vehicle movements each day.</i></p>	<p>No complaint regarding heavy vehicle movements were reported to, or identified by the auditor.</p> <p>Site Delivery Driver Logs were implemented during construction to record vehicle movements into and out of the project. Records provided do not account for every day between commencement of construction to commencement of operations, however are generally considered compliant.</p> <p>No complaint regarding heavy vehicle movements were reported to, or identified by the auditor.</p>	C
CoA S3.3	<p>Access route</p> <p>All vehicular traffic associated with the development must travel to and from the project site via the Mitchell Highway, Goolma Road and the approved site access point (shown in Appendix 1 of Conditions of Consent)</p>	<p>The Construction IEA conducted by J2M Systems in February 2020 reported this as compliant.</p> <p>Site inspection undertaken 28 February – 02 March 2023.</p> <p>Traffic management plan</p> <p>Operational IEA scope consultation.</p> <p>LSBP Feedback register (as available on website at time of audit: https://lightsourcebp.com/project/wellington-solar/).</p>	<p>All access to site is via the approved site access point on Goolma Road, accessed via Mitchell Highway. All other access points are blocked with perimeter fencing.</p> <p>No issues raised during Operational IEA scope consultation. No complaints reported with regard to traffic access.</p> <p>Considered compliant.</p>	C
CoA S3.4	<p>Road upgrades</p> <p>Prior to the commencement of construction, unless RMS agrees</p>	The Construction IEA conducted by J2M Systems in	Road upgrade completed prior to commencement of construction. No works	NT

Minister's Conditions of Approval (CoA) – SSD 8573 Mod 1 and Mod 2				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	otherwise, the Applicant must upgrade the intersection of Goolma Road and the site access point with a Basic Right Turn (BAR) and Basic Left Turn (BAL) treatment in accordance with the <i>Austroroads Guide to Road Design</i> (as amended by RMS supplements), design and constructed for a 100km/h speed zone and able to accommodate the largest vehicle accessing the intersection, to the satisfaction of RMS.	February 2020 reported this as compliant.	applicable to the operation phase of the development.	
CoA S3.5	Operating conditions The Applicant must ensure: (a) the internal project site roadways are constructed as all-weather roadways (b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.	The Construction IEA conducted by J2M Systems in February 2020 reported this as non-compliant, with the following recommendation: <i>'The applicant must construct the internal project site roadways as all-weather roadways. Additionally, install wheel wash facilities as nominated within the Biodiversity Management Plan (Section 7.6).'</i> Site inspection 28 February – 02 March 2023. S&W Report, Remediation of roads, swales and areas affected with erosion and sedimentation, dated 01 November 2022.	a) All internal project roadways are now constructed as all-weather roadways. b) Sufficient parking areas are available on site for all anticipated vehicles. No reports of vehicles parking on public road network in the vicinity of the site during construction. c) The capacity of the existing roadside drainage network did not appear reduced. Drainage has been maintained following periods of heavy rain. d) No complaints reported, considered to be compliant. e) All internal project roadways are now constructed as all-weather roadways, limiting dirt being tracked onto the public road network.	C

CoA S3.6	<p>Traffic Management Plan</p> <p>Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with the RMS and Council, and to the satisfaction of the Secretary. The plan must include:</p> <p>(a) details of the transport route to be used for development-related traffic;</p> <p>(b) details of the measures that would be implemented to minimise traffic safety issues and disruption to users of Goolma Road during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> - performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; - temporary traffic controls, including detours and signage; - notifying the local community about project-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential for conflict with school buses, rail services and other motorists as far as practicable; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and <p>(c) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> - travelling speeds; - driver fatigue; - procedures to ensure that drivers adhere to the designated transport routes; and - procedures to ensure that drivers implement safe driving practices; and <p>(d) a flood response plan detailing procedures and options for safe access to the site in the event of flooding.</p> <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	<p>Assessed as compliant in the Construction Phase IEA conducted by J2M Systems in February 2020.</p> <p>Correspondence from NSW DPIE, un-dated endorsing the Traffic Management Plan (revision 2.6, dated 2 June 2020).</p> <p>BJC Traffic Control Services Pty Ltd Construction Traffic Control Plan, Wellington Solar Farm, Goolma Road Wellington March 2020.</p> <p>Dubbo Traffic Control Plan (TCP) for Goolma Road underboring works 16 June 2020.</p> <p>BJC TCP for Goolma Road Lane Closure.</p> <p>Wellington Solar Farm Site Compound Plan, including designated parking area, Dubbo Traffic Control 13 November 2019.</p> <p>Correspondence from Dubbo Regional Council, 03 June 2020, re: Section 138 Roads Act Approval: Install or extend services in, under or across road (Goolma Rd).</p> <p>Visual confirmation of Marker Posts installed at Goolma Rd adjacent substation indicating existence of underground electrical conduit/cable.</p> <p>General Mobile Plant Pre-Mobilisation Checklist for three mini buses.</p> <p>National Heavy Vehicle Regulator Class 1 – Over Size/ Over Mass, Mass or Dimension Exemption Permit. Permit No 325883, issued 30/04/2022 – 29/05/2020.</p>	<p>A revised Traffic Management Plan was prepared and submitted to and approved by the Department to incorporate changes resulting from SSD 8573 Modification 2.</p> <p>Implementation during construction was assessed in the Construction IEA, but generally appears consistent with the plan.</p> <p>No road upgrades since construction and thus not triggered for Development Phase IEA.</p> <p>Operational activities are limited to site staff travelling to the site office and carrying out maintenance activities on solar farm infrastructure. Operational activities are confined to internal access roads and parking areas, consistent with the measures outlined within the approved Traffic Management Plan.</p> <p>National Heavy Vehicle Regulator approval was obtained for the transportation of the over size over mass heavy vehicle for the transport of transformers.</p>	C
CoA S3.7	<p>Landscaping Vegetation buffer</p> <p>The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 of the Conditions of Consent to the satisfaction of the Secretary. This vegetation buffer must:</p>	<p>a) vegetation buffer species are identified in the Landscaping Plan (LP), version 2.8 dated 10 August 2020, prepared by NGH Environmental.</p> <p>Tax invoice from BilbyBlooms, dated 14/10/2020 for 400</p>	<p>Non-Compliant</p> <p>Whilst vegetative buffer plantings observed in Site 5, Site 4, along Site 3, and Site 2, there were no plantings were observed at Site 1.</p>	NC

	<p>(a) consist of a variety of vegetation species that are endemic to the area;</p> <p>(b) within 3 years of the commencement of construction be effective at screening view of the solar panels and ancillary infrastructure (excluding the overhead power lines) on site from surrounding residences; and</p> <p>(c) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise.</p>	<p>plants, being of species consistent with those outlined in the approved landscaping plan.</p> <p>b) Site inspection observations 28 February – 02 March 2023.</p> <p>C) Site inspection observations 28 February – 02 March 2023.</p>	<p>It was evident during the site inspection that minimal monitoring, maintenance (e.g. weed management) and replacement of unsuccessful plants has occurred throughout the construction and operation period.</p> <p>Overall, The mature vegetative buffer has not yet been established (Site 1), effectively maintained (Sites 2, 3 and 4).</p> <p>Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer.</p> <p>The Proponent is considered to be non-compliant with the requirements of CoA s3.7.</p> <p>Auditor Recommendation: The Proponent must establish and maintain the mature vegetation buffer as per the requirements of this condition.</p>	
CoA S3.8	<p>Landscaping Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with RMS, Council and surrounding landowners, to the satisfaction of the Secretary. The plan must include:</p> <p>(a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) - (c);</p> <p>(b) include a program to monitor and report on the effectiveness of these measures; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020, with the following recommendation:</p> <ul style="list-style-type: none"> <i>It appears that NGH Environmental have updated the version numbering of the LP immediately following approval of the Secretary. I.e. the submitted and approved LP Version 2.3 became a final version 2.4 for issue after approval. It is recommended that the version numbers for subsequent versions of all project management plans remain unchanged from the time of approval to ensure only approved plans are subject to implementation on site.</i> <p>Correspondence from NSW DPIE, 24 August 2020 endorsing the Landscaping Plan (revision 2.8, dated 10 August 2020), as reviewed to incorporate changes resulting from SSD 8573 Modification 2.</p>	<p>The Landscaping Plan was revised to incorporate changes resulting from SSD 8572 Modification 2. The revision numbers remained as approved, addressing the auditors Construction IEA recommendation.</p> <p>The Landscaping plan includes control measures applicable to both construction and operation phases.</p> <p>Non-Compliant</p> <p>The implementation of the Landscaping plan is considered non-compliant with the following deficiencies identified during the audit:</p> <ul style="list-style-type: none"> No evidence of monthly monitoring and report since planting (Landscape Plan, Appendix C.4.5) No evidence of weed control at 	NC

		<p>Wolfpeak quote re: Landscaping screening 27 April 2020.</p> <p>Agronomist Report, Wellington Solar Farm, following inspection 18/07 – 19/07/2022. Luke Hogan and John John Ronan (company unknown).</p> <p>Tax invoice from BilbyBlossoms, dated 14/10/2020 for 400 plants, being of species consistent with those outlined in the approved landscaping plan.</p> <p>Site inspection observations 28 February – 02 March 2023.</p> <p>S&W Maintenance Procedure 16, Inspection and Maintenance Procedure for Site Routine, Rev 1, dated 20 February 2023.</p> <p>S&W Maintenance checklists completed 14 and 21 January, and 04 and 21 February 2023.</p> <p>Agronomist Report, Wellington Solar Farm following Site Visit 18-19 July 2022.</p>	<p>Sites 1 and 2.</p> <ul style="list-style-type: none"> - No evidence of supplementary plantings to achieve 90% success rate. - Weeds were observed in numerous locations across the site and the Construction inspections and the recently completed S&W Maintenance Checklists for operations failed to effectively identify weed management issues on site, including weed locations and necessary management actions (Landscape Plan, Appendix C.4.3). - If applied, there is no record of the Pesticide Application Record being completed (Landscape Plan, Appendix C.4.1 and C.4.3) <p>Auditor Recommendation: The Proponent must implement the measures outlined within the Landscaping plan to achieve planting success and to better manage weed prevalence on site.</p>	
CoA S3.9	<p>Land management</p> <p>Following any construction or upgrading on site, the Applicant must:</p> <p>(a) restore the ground cover of the site as soon as practicable, but within 12 months of completing any construction or upgrades, using suitable species;</p> <p>(b) restore and maintain the ground cover with appropriate perennial species; and</p> <p>(c) manage weeds within this ground cover.</p>	<p>Evidence collected under CoA s3.8</p> <ol style="list-style-type: none"> Site inspection observations 28 February – 02 March 2023. The following Regeneration Seed Mix was utilised for pasture rehabilitation: Regen Blend – Solar Farm Label No. 30600 including Tetila 20%, Wimmera 20%, Origin 20%, Dalkeith 20% and Cavalier 20%. Site inspection observations 28 February – 02 March 2023. Agronomist Report, Wellington Solar Farm following Site Visit 18-19 July 2022. <p>LSBP – PO/Service Order: PO-AUS004-971 Version 1, dated 06 February 2023, regard 2023 Vegetation</p>	<p>The previous construction IEA was undertaken at a time following a period of intense drought for the Central West NSW, and Eastern Australia broadly.</p> <p>Since then, the project area has experienced prolonged and high rainfall, including periods of significant flooding within Central West NSW, which has resulted in high groundcover growth and successful rehabilitation of the site.</p> <p>It was observed during the site inspection that groundcover underneath the solar panels appears both lush (green) and</p>	C

		<p>Management Additional Services Order, including scope of works. The scope of works sets out full site vegetation management that includes but not limited to:</p> <ol style="list-style-type: none"> 1. Mowing inside and outside of the array. 2. Weed spraying inside and outside the array, combiner box, inverter station, and spot spraying. 3. Spray fire breaks (APZ) 4. Agronomist Report. 	<p>higher percentage cover than areas immediately adjacent and not underneath the solar panels.</p> <p>The Proponent has recently engaged a contractor for vegetation management services, including mowing inside and outside of the array, weed management and on-going agronomist reporting.</p> <p>Noting the non-compliances identified under CoA s3.8 and CoA s3.11 with regard to the management of weeds on site, the proponent is generally considered to have complied with the requirements of this condition. All construction areas have a reasonable level of groundcover and sheep are actively grazing within the solar array.</p>	
CoA S3.10	<p>Biodiversity Retirement of credits</p> <p>Within two years of commencing development under this consent, unless otherwise agreed by the Secretary, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below to the satisfaction of BCD, unless the Secretary agrees otherwise.</p> <p>The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Scheme</i> and can be achieved by:</p> <p>(a) acquiring or retiring 'biodiversity credits' within the meaning of the <i>BC Act</i>;</p> <p>(b) making payments into an offset fund that has been developed by the NSW Government; or</p> <p>(c) providing supplementary measures.</p> <p><i>Table 1: Ecosystem Credit Requirements</i> Vegetation Community: White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion PCT ID: 266 Credits Required under the TSC Act: 3 Credits Required under the BC Act: 68</p> <p><i>Table 2: Species Credit Requirements</i></p>	<p>Ecosystem credit:</p> <p>NSW DPIE, Statement of assessment of reasonable equivalence of biodiversity credits, dated 17 January 2020. This document outlines the determination made in accordance with clause 22(3) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</p> <p>Correspondence 01 December 2021 from NSW DPIE Biodiversity and Conservation Division, providing confirmation of credit retirement (70 credits) for Lightsource Australia SPV4 Pty Ltd for the purpose of complying with a requirement to retire biodiversity credits of a planning approval or vegetation clearing approval reference SSD 8752.</p> <p>Biodiversity Offset Credit Transaction Report, as extracted and viewed 15/03/2023.</p> <p>Species Credit Correspondence from NSW Biodiversity Conservation Trust, dated 27/10/2020, confirming payment into the Biodiversity Conservation Fund for an offset obligation.</p>	<p>Construction commenced 04 December 2019</p> <p>LSBP retired the required 70 ecosystem credits on 01 December 2021 which is within two years of commencing development in compliance with the requirements of this condition.</p> <p>LSBP met their biodiversity credit retirement obligations by payment to the Biodiversity Conservation Fund of 1 credit for the White-bellied Sea-Eagle and 2 credits for the Pink-tailed Legless Lizard, on 27 October 2020 which is within two years of commencing development in compliance with the requirements of this condition.</p>	C

	<p>Species Credit Species: Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>) Credits Required under the BC Act: 2 White-bellied Sea-Eagle (<i>Haliaeetus leucogaster</i>) Credits Required under the BC Act: 1</p> <p>Note: Following repeal of the TSC Act on 25 August 2017, credits created under that Act are taken to be 'biodiversity credits' under the BC Act by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</p>			
CoA S3.11	<p>Biodiversity Management Plan Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must: (a) include a description of the measures that would be implemented for: - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and (b) include a seasonally based program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Assessed as non-compliant in the Construction Phase IEA by J2M Systems, February 2020, with the following recommendations in relation to the non-compliance:</p> <ul style="list-style-type: none"> - <i>Calculate and record the cumulative amount of vegetation cleared and ensure the project is within approved limits.</i> <p>Vegetation removal tracking map established to calculate and record the cumulative amount of vegetation cleared. Map updated following clearing works 28 April 2020.</p> <ul style="list-style-type: none"> - <i>Implement all requirements of the BMP for any future clearing, including pre-clearing surveys to identify habitat trees, ground disturbance permit and hollow-bearing tree removal procedure as applicable.</i> <p>Correspondence from OzArk Environmental and Heritage dated 28 April 2020 re: Supervisor of habitat tree clearing for the Wellington Solar Farm.</p> <p>Samples of completed Land Disturbance Permits for trenching and piling in management zones 1 and 2 (27 April 2020), and for creek works (02 June 2020).</p> <p>The following auditor recommendation was also recorded in the 2020 IEA:</p> <ul style="list-style-type: none"> - <i>Undertake weed management and inspections as per Section 7.5.1 of the BMP, including a survey of weed distribution across the project</i> 	<p>Preparation and approval of the Biodiversity Management Plan (BMP) was considered in the Construction Phase IEA. Implementation of the plan is considered as part of this audit.</p> <p>A vegetation removal tracking map was established and updated following the final clearing works undertaken on the project. This vegetation clearing was supervised by an ecologist in accordance with the requirements of the approved Biodiversity Management Plan. The Vegetation Removal Tracking Map (dated 30 June 2020) indicates that clearing works were below the approved allowances.</p> <p>Site inspections were undertaken and confirmed the re-use of coarse woody debris in management zones 3 and 4 generally in a manner consistent with the required set out in the Biodiversity Management Plan.</p> <p>Re-use of soil resources was difficult to determine, however on the basis that groundcover has re-established across the site it is considered compliant.</p> <p>Non-compliant: The implementation of the Biodiversity Management Plan is considered non-compliant with the requirements of CoA s3.11 with the following deficiencies identified against the requirements of the</p>	NC

		<p><i>site.</i></p> <p>No formal evidence of weed distribution surveys obtained during this audit.</p> <p>LSBP HSE Workplace Observation report – Weeds, dated 25 November 2020.</p> <p>LSBP HSE Workplace Observation report – Weeds, dated 08 January 2021.</p> <p>LSBP HSE Workplace Observation report – Weeds, dated 08 January 2021.</p> <p>Internal email LSBP to S&W dated 06 January 2021 indicating noxious weed outbreak on site which need containment.</p> <p>Agronomist Report, Wellington Solar Farm following Site Visit 18-19 July 2022.</p> <p>Correspondence from NSW DPIE, 17 September 2020, endorsing the revised Biodiversity Management Plan (revision 3.6, dated 14 September 2020) to incorporate changes resulting from SSD 8573 Modification 2.</p> <p>The following Regeneration Seed Mix was reportedly utilised for pasture rehabilitation: Regen Blend – Solar Farm Label No. 30600 including Tetila 20%, Wimmera 20%, Origin 20%, Dalkeith 20% and Cavalier 20%.</p>	<p>Biodiversity Management Plan:</p> <ul style="list-style-type: none"> - No evidence of quarterly weed survey for site and exclusion zones (construction) (BMP s10.3). - No evidence of annual weed survey for site and exclusion zones (operation) (BMP s10.3). - No evidence of weed mapping by GPS, including noting the species and degree of infestation, and capturing an image for monitoring purposes (BMP s10.3). - No evidence of groundcover monitoring using 1m x 1m quadrats placed at 30 random locations within Zone 2 and within all planted areas. Nominated to be completed fortnightly for first six months after establishment, 6 months after establishment and then annually throughout operations (BMP s10.3). - If applied, there is no record of the Pesticide Application Record being completed (BMP s7.5.1). - The regeneration seed mix reportedly utilised for pasture rehabilitation is inconsistent with the target to established perennial native pasture species under solar panels (BMP, Appendix A – Ground Cover Management Plan). 	
CoA S3.12	<p>Amenity</p> <p>Construction, Upgrading and Decommissioning hours</p> <p>Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <p>(a) 7am to 6pm Monday to Friday;</p> <p>(b) 8am to 1pm Saturdays; and</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Site Induction presentation.</p> <p>Discussions with:</p> <p>- S&W O&M Site Manager.</p>	<p>Operational activities are not trigger by the requirements of this condition.</p> <p>On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements</p>	NT

	<p>(c) at no time no Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none"> - activities that are inaudible at non-associated receivers; - the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or - emergency work to avoid the loss of life, property and/or material harm to the environment. 	<p>- LSBP Asset Manager.</p> <p>Covid work hours</p>	<p>of this condition.</p>	
CoA S3.13	<p>Noise</p> <p>The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guidelines</i> (DECC, 2009), or its latest version.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>No complaints.</p>	<p>Operational activities are not trigger by the requirements of this condition.</p> <p>On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements of this condition.</p>	NT
CoA S3.14	<p>Dust</p> <p>The Applicant must minimise the dust generated by the development.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Construction Environmental Management Plan (CEMP)</p> <p>Observations during site inspection, including:</p> <ul style="list-style-type: none"> • All weather access roads • Groundcover maintained in all areas. • 20km speed limit on site. <p>No record of dust related complaints.</p> <p>Discussions with:</p> <p>- S&W O&M Site Manager.</p>	<p>The Construction IEA assessed this as compliant. It was reported that up to 4 water carts were reportedly utilised during construction to managed dust suppression.</p> <p>Operational dust generation is minimal as access roads are constructed as all-weather access road and have a low-speed limit to further reduce dust generation.</p> <p>On the basis that no complaints have been reported or received, the project is generally considered complaint with the requirements of this condition.</p>	C
CoA S3.15	<p>Visual</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes. 	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. <p>Observations during site inspection.</p> <p>Project Feedback register.</p>	<ul style="list-style-type: none"> (a) Glare is not typically associated with solar panels and they are designed to absorb light. No glare related complaints recorded by the project team. No issues raised during audit consultation. (b) Ancillary infrastructure is consistent with surrounding environment and existing buildings. (c) Two signs are located at the site 	C

			<p>entrance to identify the site.</p> <p>On the basis of the above and supported by no complaints having been reported or received, the project is generally considered compliant with the requirements of this condition.</p>	
CoA S3.16	<p>Lighting</p> <p>The Applicant must:</p> <p>(a) minimise the off-site lighting impacts of the development; and</p> <p>(b) ensure that all external lighting associated with the development:</p> <ul style="list-style-type: none"> - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with <i>Australian Standard AS4282 (INT) 1997 - Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version. 	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. <p>Observations during site inspection.</p> <p>Project Feedback register.</p>	<p>Low intensity security and personal lighting is required for Operational Phase.</p> <p>No complaints have been reported or received regarding intrusive lighting.</p> <p>The audit and associated site inspection took place in daylight hours only.</p>	C
CoA S3.17	<p>Heritage</p> <p>Protection of heritage items</p> <p>Prior to the commencement of construction, the Applicant must salvage and relocate all Aboriginal heritage items located within the approved development footprint to suitable alternative locations on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.</p> <p>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 1 of the Conditions of Consent.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Aboriginal Cultural Heritage Salvage Report, Wellington Solar Farm, August 2020. NGH Environmental.</p> <p>Aboriginal Site Recording Forms (AHIMS Site ID 36-4-0215). Dated 07 August 2020.</p>	<p>This report specifically details the findings of the Aboriginal heritage salvage program including the surface collection, subsurface testing and burial of Aboriginal heritage items recovered from within the approved development footprint for the Wellington Solar Farm. The report confirms that the salvage program for the Wellington Solar Farm was undertaken in line with the project Conditions of Consent (CoC) and Cultural Heritage Management Plan (CHMP).</p>	C
CoA S3.18	<p>The Applicant must:</p> <p>(a) ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint;</p> <p>(b) minimise any impacts on the historic heritage items, and the potential archaeological deposits located within the approved development footprint; and</p> <p>(c) undertake a program of test excavation and salvage at the potential archaeological deposits located within the approved development footprint, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010) or its latest version.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>(a) Cultural Heritage management Plan (CHMP), Revision 1.8, dated 11 August 2020.</p> <p>Correspondence from NSW DPIE dated 24 August 2020 endorsing the Cultural Heritage management Plan, Revision 1.8, dated 11 August 2020, updated to incorporate changes under SSD 8573 Modification 2.</p> <p>(b) Unexpected Finds Protocol within CHMP</p> <p>Correspondence from NGH Consulting, dated 20 April</p>	<p>Cultural heritage management plan revised to incorporate changes under SSD 8573 Modification 2.</p> <p>(a) It was reported and observed that no works have occurred outside the approved development footprint.</p> <p>(b) Known heritage items and deposits were relocated prior to construction. Unexpected finds protocol was implemented on the site, including two unexpected find reports.</p>	C

	Note: The location of the Aboriginal heritage items and potential archaeological deposits referred to in this condition are shown in the figure in Appendix 1 of the Conditions of Consent.	2020, re: Possible artifact – Block 9 – Cable trench – Not an artefact. Site inspection observations.	(c) The test excavations and salvage of the PADs was complete prior to construction and not triggered by operations. Areas of relocated heritage items remain as exclusion zones during operations.	
CoA S3.19	<p>Heritage Management Plan</p> <p>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with BCD and Aboriginal Stakeholders;</p> <p>(c) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> - protecting the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works; - salvaging and relocating the Aboriginal heritage items located within the approved development footprint; - minimising and managing the impacts of the development on the historic heritage item, and the potential archaeological deposits located within the development footprint, including: <ul style="list-style-type: none"> - undertaking test excavation and salvage at the potential archaeological deposits, and - a strategy for the long-term management of any Aboriginal heritage items or material collected during the test excavation works; - a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified Aboriginal heritage items are found; <p>or</p> <ul style="list-style-type: none"> - Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Secretary's approval, the Applicant must</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>(a) Cultural Heritage management Plan (CHMP), Revision 1.8, dated 11 August 2020.</p> <p>Correspondence from NSW DPIE dated 24 August 2020 endorsing the Cultural Heritage management Plan, Revision 1.8, dated 11 August 2020, updated to incorporate changes under SSD 8573 Modification 2.</p> <p>Observations during audit site inspection.</p> <p>Unidentified finds records (photos)</p> <p>Correspondence from NGH Consulting, dated 20 April 2020, re: Possible artifact – Block 9 – Cable trench – Not an artefact.</p> <p>No skeletal items located.</p>	<p>Cultural heritage management plan revised to incorporate changes under SSD 8573 Modification 2.</p> <p>Implementation:</p> <p>An unexpected find was discovered on 20 April 2020 and reported to the Heritage Consultant, NGH Consulting Pty Ltd. An exclusion zone was established around the item (as evidenced by site photographs). NGH Environmental Heritage Consultant advised that the item was not an artefact.</p> <p>The site of previously relocated Aboriginal heritage items continues to be maintained as an exclusion zone during the operational phase of the project.</p> <p>Based on the above, and on the basis of the management of the unexpected finds, including initial identification, cease work and reporting, the project is considered compliant with the requirements of this condition.</p>	C

	implement the Heritage Management Plan.			
CoA S3.20	Soil & Water Water Pollution The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	Discussions with: - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. Observations during site inspection.	It was reported that there has been no water pollution incidents or events on the project at the time of this audit. The auditor did not identify any evidence of water pollution. There was no standing or flowing water on the project site at the time of the audit site inspection.	C
CoA S3.21	Stormwater drainage Prior to the commencement of construction, the Applicant must prepare a detailed Stormwater Plan for the site to the satisfaction of the Secretary. Following the Secretary's approval, the Applicant must implement the Stormwater Plan.	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020. Soil, Water and Stormwater Management Plan, Version 2.4 dated 09 April 2020, prepared by NGH Environmental Pty Ltd. Correspondence from NSW DPE, dated 07 May 2020 endorsing the Soil, Water and Stormwater Management Plan (Rev 2.4), incorporating changes under SSD 8573 Modification 2. S&W Report, Remediation of roads, swales and areas affected with erosion and sedimentation, dated 01 November 2022. Site inspection observations including: <ul style="list-style-type: none"> • Overarching Erosion and sediment control plan, Wellington Solar Farm • Sediment and Erosion Control Detail, Prepared by RobertBirdGroup (SWLB-LSBP-AUS-170MV-C-DWGSACED-302-R0). • Installed sediment and erosion controls around ground disturbance areas and within onsite drainage lines. • Delineated riparian buffer along Wuuluman Creek. • All-weather access roads • Rock checks within draining lines. • Stabilised rock placed where surface flows cross internal roadways. • Spill kits available on site. 	A revised Soil, Water and Stormwater Management Plan (SWSMP) was submitted to and approved by the Secretary to incorporate changes under SSD 8573 Modification 2. The SWSMP generally appears to be implemented on site and areas of site affected by recent heavy rainfall have been remediated.	C
CoA S3.22	Operating conditions	Assessed as non-compliant in the Construction Phase IEA	Construction based sediment and erosion	C

	<p>The Applicant must:</p> <p>(a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;</p> <p>(b) ensure the solar panels and associated infrastructure are designed, constructed and maintained to avoid causing any erosion on site;</p> <p>(c) ensure all works (including waterway crossings) are conducted in accordance with the:</p> <ul style="list-style-type: none"> - <i>Guidelines for Controlled Activities on Waterfront Land (2012)</i>, or its latest version; and - <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004)</i>, or its latest version. 	<p>by J2M Systems, February 2020, with the following recommendation:</p> <p><i>Install and maintain adequate erosion and sediment controls across the site in accordance with the requirements of the Managing Urban Stormwater: Soils and Construction Manual (Landcom, 2004) to manage erosion and sediment risks.</i></p> <p>Soil, Water and Stormwater Management Plan, Version 2.4 dated 09 April 2020, prepared by NGH Environmental Pty Ltd.</p> <p>Correspondence from NSW DPE, dated 07 May 2020 endorsing the Soil, Water and Stormwater Management Plan (Rev 2.4), incorporating changes under SSD 8573 Modification 2.</p> <p>S&W Report, Remediation of roads, swales and areas affected with erosion and sedimentation, dated 01 November 2022.</p> <p>Site inspection checklists.</p> <p>Site inspection observations.</p> <p>Spill kits available on site.</p>	<p>controls were assessed as part of the Construction IEA in February 2020.</p> <p>Operational sediment and erosion controls were assessed during this audit and appear consistent with the requirements of <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004), with following observations made:</p> <ul style="list-style-type: none"> • Sediment and erosion controls, including sediment fencing and rock checks were observed installed and maintained in key risk areas and within onsite drainage lines. • The riparian buffer along Wuuluman Creek remains an exclusion zone. • All-weather access roads have been constructed. • Rock checks within draining lines. • Stabilised rock placed where surface flows cross internal roadways. <p>Post rainfall inspections were completed and action was taken to address sediment and erosion control issues identified, including minor scouring underneath some solar panels and in internal drainage lines, in particular those adjacent to internal road ways.</p> <p>Waterway crossings design and construction appears consistent with the requirements to allow safe fish passage.</p> <p>Considered compliant.</p>	
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CoA S3.23	<p>Hazards Fire Safety Study At least one month prior to the commencement of construction of the development, or unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study for the development, in consultation with Fire & Rescue NSW, and to the satisfaction of the Secretary. The study must: (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines', and (b) report on the implementation status of the mitigation measures, listed in the EIS. Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.</p>	<p>Correspondence from NSW DPIE, dated 23 May 2019, regarding approval to defer the submission of the Fire Safety Study to until at least one month prior to commencement of construction of the battery storage facility.</p>	<p>DPIE has given approval for the Fire Safety Study to be deferred until at least one month prior to commencement of construction of the battery storage facility.</p> <p>The battery storage facility has not been constructed and is not yet planned to be constructed.</p> <p>The requirements of this condition were not yet triggered at the time of this audit.</p>	NT
CoA S3.24	<p>Storage and handling of Dangerous Goods The Applicant must: (a) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: <i>The storage and handling of flammable and combustible liquids</i>, or its latest version; (b) ensure the substation is suitable bunded; and (c) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.</p>	<p>Observations during audit site inspection.</p>	<p>Under the operational phase of the development there are minimal types and quantities of dangerous goods stored on site.</p> <p>Minor spills of hydraulic fluid and associated remediation were noted during construction and recorded in the Incident Register.</p> <p>The auditor did not observe any improper handling of dangerous goods or hazardous materials on site at the time of the audit.</p>	C
CoA S3.25	<p>Operating conditions The Applicant must: (a) minimise the fire risks of the development; (b) ensure that the development: - includes at least a 10 metre defendable space around the Electric Storage Facility as well as the perimeter of the solar array area that permits unobstructed vehicles access; - manages the defendable space and solar array area as an Asset Production Zone; - complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2006</i> (or equivalent) and <i>Standards for Asset Protection Zones</i>; - is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to the internal access road; (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management</p>	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. <p>Observations during audit site inspection.</p> <p>Revised project layout.</p> <p>Draft Emergency response plan, 27/02/2023, Revision 1 (internal document not yet issued for review, pending consultation if RFS and Fire & Rescue NSW).</p>	<p>A Fire Management and Emergency Response Plan has been prepared for the operational phase of the project.</p> <p>The project layout accommodates a 10m defendable space around the site, which was observed maintained as an asset protection zone (APZ). The APZ includes an all-weather perimeter road around the development.</p> <p>A 20,000L water tank with 65mm Storz fitting is located near Narrawa Homestead. An additional portable firefighting trailer was also available in the main compound.</p> <p>Recommendation: In accordance with CoA s3.25(d) the proponent is required to notify</p>	C

	committee following construction of the development, and prior to the commencement of operations.		the relevant local emergency management committee now that the project has commenced operating.	
CoA S3.26	Fire Management and Emergency Response Plan Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times.	Discussions with: - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. Fire Management and Emergency Response Plan, revision 2.4 dated 27 April 2020, prepared by NGH Environmental. Two copies of the plan are maintained at the site gate.	A Fire Management and Emergency Response Plan has been prepared for the operational phase of the project. The S&W O&M Site Manager reported that consultation with RFS is currently underway (recently). Recommendation: It is recommended that both RFS and Fire & Rescue NSW are further consulted with regard to the content of the Fire Management and Emergency Response Plan as there is little evidence to support this having occurred since the initial comments raised in response to the Environmental Impact Statement.	C
CoA S3.27	Waste The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.	Discussions with: - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager.	There is only limited waste generated during the operational phase of the development, including general office-based waste and waste from maintenance of equipment, such as replacement of damage solar panels. A waste register was maintained during construction to track type of waste, category and disposal location. It was reported that the site has not received or disposed of any waste on site, and there was no evidence to suggest otherwise. On the basis of no waste issues being identified during the audit site inspection, the site is generally considered compliant with the requirements of this condition.	C
CoA S3.28	Decommissioning and rehabilitation Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant shall rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3 .	N/A	Construction commenced 04 December 2019 and operations commenced 23 December 2022. The site remains in operational phase and as such the requirements of this condition had not been triggered at the time	NT

	<p>Table 3: Rehabilitation Objectives</p> <p>Feature: Project Site</p> <p>Objective:</p> <ul style="list-style-type: none"> - Safe, stable and non-polluting - Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use. <p>Feature: Solar farm infrastructure</p> <p>Objective: To be decommissioned and removed, unless the Secretary agrees otherwise.</p> <p>Feature: Land use</p> <p>Objective: Restore the land and soil capability to the same class, and the associated agricultural productivity potential to pre-existing levels.</p> <p>Feature: Community</p> <p>Objective: Ensure public safety</p>		of this audit.	
Schedule 4	Environmental Management and Reporting			
CoA S4.1	<p>Environmental Management</p> <p>Environmental Management Strategy</p> <p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:</p> <ul style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> - keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise; - respond to any non-compliance; - respond to emergencies; and (e) include: <ul style="list-style-type: none"> - copies of any plans approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Environmental Management Strategy, prepared by NGH Environmental Pty Ltd, Version 3, dated 26 Aug 2019.</p> <p>Correspondence from NSW DPIE, dated 07 May 2020 endorsing the revised Environmental Management Strategy, revision 3.2, dated 09 April 2020.</p> <p>Revised Environmental Management Strategy, prepared by NGH Environmental Pty Ltd, Version 3.2, dated 09 April 2020 to incorporate changes resulting from SSD 8573 modification 2.</p> <p>Observations during audit site inspection.</p>	<p>The Environmental Management Strategy was revised to incorporate changes resulting from SSD 8573 modification 2.</p> <p>Implementation:</p> <p>Evidence was available to generally support the implementation of the EMS on site, including:</p> <ul style="list-style-type: none"> • Supporting management plans available on site and understood by site team. • Records of site inductions • Records of daily pre-start meetings • Records of site inspections. • Incident register • Feedback register 	C

CoA S4.14	<p>Revision of Strategies, Plans and Programs</p> <p>The Applicant must:</p> <p>(a) update the strategies, plans or programs as required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> - submission of an incident report under condition 4 of Schedule 4; - submission of an audit report under condition 6 of Schedule 4; or - any modification to the conditions of consent. 	<p>Development Consent SSD 8573 Modification 1 dated 11 December 2019, assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Development Consent SSD 8573 Modification 2 dated 03 April 2020 was assessed by this Development IEA.</p>	<p>Compliance with this condition was assessed based on the approval of SSD 8573 Modification 2.</p> <p>All management plans appear to have been revised to the satisfaction of the Secretary following the approval of SSD 8573 Modification 2.</p> <p>LSBP and S&W reportedly reviewed the management plans following completion of the Construction 2020 IEA and found no reason to revise management plans.</p> <p>LSBP and S&W reported that there were no reportable incidents under Condition 4, schedule 4.</p> <p>It is not clear if the plans were reviewed within one month, however on the basis that the plans were revised and subsequently approved by the Secretary the proponent is considered compliant with the requirements of this condition. It is noted that the 1 (one) month timeframe for review, revision and approval of management plans by the Secretary may be unrealistic. The intent of this requirement, being the progressive review and, if necessary, revision of management plans appears to have been met.</p>	C
CoA S4.15	<p>Updating and Staging of Strategies, Plans or Programs</p> <p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p>	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. 	<p>It was reported that LSBP and S&W has not sought to submit plans on a progressive basis and plans submitted for approval relate to the entire scope of the development.</p> <p>Overall the project is considered compliant with the requirement as all revised plans were submitted to and endorsed by the Secretary.</p>	C

	<p>- While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</p> <p>- If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</p>			
CoA S4.16	<p>Compliance Incident Notification</p> <p>The Department must be notified in writing 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>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. 	The project team reported no notifiable incidents; hence the requirements of this condition have not yet been triggered.	NT
CoA S4.17	<p>Non-Compliance Notification</p> <p>The Department must be notified in writing within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.</p>	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. - LSBP Asset Manager. <p>Correspondence from LSBP to the Department dated 23 March 2020 regarding non-compliance notification following the issue of the draft construction IEA report on 16 March 2020.</p>	The Proponent provided adequate notification of identified non-compliances consistent with the requirements of this condition.	C
CoA S4.18	<p>Independent Environmental Audit</p> <p>The Applicant must commission and pay the full cost of an Independent Environmental Audits of the development. The audits must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018); (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (c) be prepared, unless otherwise agreed with the Secretary: <ul style="list-style-type: none"> (i) within 3 months of commencing construction; (ii) within 3 months of commencement of operations; and (iii) as directed by the Secretary; (d) be carried out in consultation with the relevant agencies; (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and (f) recommend appropriate measures or actions to improve the 	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>NSW DPIE correspondence dated 24 Jan 2023 (SSD-8573-PA-20) re: notification of the commencement of operation.</p> <p>NSW DPIE correspondence dated 20 May 2020 re: receipt of Construction IEA report on 04 May 2020.</p> <p>NSW DPE correspondence 29 January 2020 approving the auditor.</p> <p>This Operational IEA is considered to meet the requirements of this condition.</p>	<p>Operation of the solar farm commenced on 23 December 2022. This Operational IEA commenced on site 28 February 2023, within 3 months of commencing operations.</p> <p>The previous IEA report was issued to the department, including responses to identified recommendations.</p> <p>Recommendations generally appear to have been implemented by the proponent, with the exception of the recommendation regarding the completion of weed surveys in accordance with the biodiversity management plan.</p>	C

	<p>environmental performance of the development and any strategy, plan or program required under this consent.</p> <p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.</p> <p>The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p>			
CoA S4.19	<p>Access to information</p> <p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> - the EIS; - the final layout plans for the development; - current statutory approvals for the development; - approved strategies, plans or programs required under the conditions of this consent; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - how complaints about the development can be made; - a complaints register; - compliance reports; - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	<p>The auditor accessed the LSBP Wellington Solar Farm website during the audit.</p> <p>https://lightsourcebp.com/project/wellington-solar/</p> <p>On Thursday 16 March 2023 the following documents were available on the following website:</p> <ul style="list-style-type: none"> - The EIS - Final layout plans - Development Consent SSD 8573 - Development Consent SSD 8573 Mod 1 - Development Consent SSD 8573 Mod 3 - Environmental Management Strategy (Rev 3.2) - Biodiversity Management Plan (Rev 3.3) - Traffic Management Plan (Rev 2.6) - Cultural Heritage Management Plan (Rev 1.8) - Soil, Water and Stormwater Management Plan (Rev 2.4) - Landscaping Plan (Rev 2.8) - Fire Management and Emergency Response Plan (Rev 2.0). - Construction IEA report <p>https://www.lightsourcebp.com/au/projects/wellington-solar-farm/</p> <ul style="list-style-type: none"> - Feedback form (complaints process) - Feedback register. 	<p>The Wellington Solar Farm website was found to include the majority of updated project information under with the requirements of this condition, however the following management plans were not updated on the website:</p> <ul style="list-style-type: none"> - Biodiversity Management Plan V3.6 approved 19 September 2020. <p>Recommendation:</p> <p>Ensure the most current approved version of the Biodiversity Management Plan is made available on the public website.</p>	C
Other licences, approvals	-	<p>Discussions with:</p> <ul style="list-style-type: none"> - LSBP Head of Planning – Australia and New Zealand. - S&W O&M Site Manager. 	<p>Section 138 Roads Act Approval was obtained for underboring activities at Goolma Rd.</p>	C

and permits		<p>- LSBP Asset Manager.</p> <p>Correspondence from Dubbo Regional Council, 03 June 2020, re: Section 138 Roads Act Approval: Install or extend services in, under or across road (Goolma Rd).</p>	<p>The audit was advised that LSBP is currently in the process of obtaining / confirming water access licence for the existing water bore on site.</p>	
	End of CoA checklist.			

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	Biodiversity			
B1	If the credit profile of the final infrastructure layout cannot be reduced to zero, retirement of the biodiversity credits from the biodiversity register established under Part 7A of the TSC Act would be undertaken.	Refer to CoA S3.10	Addressed under CoA S3.10	C
B2	Hollow-bearing trees within the development site would not be cleared between June and January, to avoid the breeding season of Superb Parrot and Corben's Long-eared Bat and the core hibernation period for Corben's Long-eared Bat. If clearing outside of this period cannot be achieved, pre-clearing surveys would be undertaken to ensure these species do not occur.	Assessed as not triggered in the Construction Phase IEA by J2M Systems, February 2020.	Clearing in February 2020 and was assessed as part of the Construction IEA. Clearing works are not relevant to this Operational IEA.	NT
B3	Preparation of a Flora and Fauna Management Plan (FFMP) that would incorporate protocols for: <ul style="list-style-type: none"> Protection of native vegetation to be retained Best practice removal and disposal of vegetation Staged removal of hollow-bearing trees and other habitat features such as fallen logs with attendance by an ecologist Weed management Unexpected threatened species finds and Rehabilitation of disturbed areas The FFMP would consider the potential to link and enhance remnant patches on the site. The FFMP would form part of the Wellington Solar Farm Construction Environmental Management Plan (CEMP).	Refer to CoA S3.11.	Preparation and approval of the Biodiversity Management Plan (BMP) was considered in the Construction Phase IEA. A revised Biodiversity Management Plan remains established and approved by the Secretary.	C
B5	<ul style="list-style-type: none"> Stockpiling materials and equipment and parking vehicles will be avoided within the dripline (extent of foliage cover) of any native tree. 	Observations during audit site inspection.	There was no evidence of stockpiling of materials or parking under the drip line of trees.	C
B5	<ul style="list-style-type: none"> A riparian buffer zone of 40m along Wuuluman Creek should be clearly delineated prior to works commencing. Works should be avoided within the riparian buffer zone. Existing native riparian vegetation is retained to the 	Refer to CoA S3.22 Site inspection observations.	A riparian buffer zone was observed established along Wuuluman Creek. Existing native vegetation appears to have been retained to the greatest extent possible and disturbed areas have been regenerated.	C

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	<p>greatest extent possible in an undamaged and unaltered condition.</p> <ul style="list-style-type: none"> Works occurring around the Wuuluman Creek should be in accordance with the DPI Fisheries Policy and Guideline Document Policies and Guidelines for Fish Habitat Conservation and Management. 		<p>As the Wellington Solar Farm is State Significant Development (SSD), under the provisions of the EP&A Act, a permit under section 201, 205 or 219 of the Fisheries Management Act 1994.</p> <p>Works in and around Wuuluman Creek appear to have been undertaken in accordance with the DPI Fisheries policy and guidelines.</p>	
B6	<ul style="list-style-type: none"> A groundcover management plan would be developed and implemented to ensure an appropriate perennial ground cover is established and maintained beneath the arrays during operation of the solar farm. This will require consideration of existing groundcover and may require expert input and trials to achieve the objective. 	Biodiversity Management Plan (Version 3.6)	<p>A groundcover management plan has been prepared within the approved Biodiversity Management Plan.</p> <p>The implementation of the Groundcover Management Plan appears satisfactory with the groundcover benefiting from regular rains in recent years. Weed management remains an issue on site.</p>	C
B7	<ul style="list-style-type: none"> Where possible, landscape plantings will be comprised of local indigenous species with the objective of increasing the diversity of the existing vegetation. Planting locations would be designed to improve the connectivity between patches in the landscape where consistent with landscaping outcomes. 	Refer to CoA S3.8 Site inspection observations.	The approved landscape plan includes specifications for perimeter plantings, including for use of native species, which were observed planted in Site 5, Site 4, along Site 3, and Site 2.	C
B8	<ul style="list-style-type: none"> Carry out refuelling of plant and equipment, chemical storage and decanting off site or at least 50m away from farm dams in impervious bunds. Ensure that dry and wet spill kits are readily available. 	Site inspection observations.	<p>No refuelling works occurring during Operational activities. Spill kits were observed within the site compound.</p> <p>No refuelling issues were identified during the audit site inspection. No uncontained spills were reported or identified. Considered compliant.</p>	C
B9	<ul style="list-style-type: none"> The Construction Environmental Management Plan will include measures to avoid noise encroachment on adjacent habitats such as avoiding night works as much as possible. 	CEMP	The CEMP includes noise management measures, including requirements for works within approved construction hours.	C
B10	<ul style="list-style-type: none"> Avoid night works. Direct lights away from vegetation 	Site inspection observations. Discussion with S&W O&M Site Manager.	It was reported that no night works had been undertaken at the time of this audit and that all	C

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			construction work was within approved hours.	
B11	<ul style="list-style-type: none"> Weed, hygiene and pest management protocols will be prepared and implemented as part of the Flora and Fauna Management Plan for the proposal. 	Refer to CoA S2.13 and S3.11	<p>Biodiversity Management Plan prepared and approved by the Secretary that includes control measures for weed, hygiene and pest management.</p> <p>Audit finding discussed under CoA S2.13 and S3.11</p>	<p>NC</p> <p>NC raised under CoA S3.11</p>
B12	<ul style="list-style-type: none"> Awareness training during site inductions regarding enforcing site speed limits Site speed limits to be enforced. 	Discussion with S&W O&M Site Manager Induction presentation.	Speed limit awareness is included as part of the site induction process and limits are sign posted on site. Speed limited appeared were adhered to during the audit site inspection.	C
	Aboriginal heritage			
AH1	<ul style="list-style-type: none"> The development must avoid the site Wellington Scarred Tree 1, as per the current development design plans detailed in this report. A minimum 10m buffer around the tree should be in place to protect the tree given its current condition. 	Observation during audit site inspection.	A 10m-exclusion zone was observed established around the Wellington Scarred Tree 1 prior to construction (sighted during Construction IEA) and this remains in place.	C
AH2	<ul style="list-style-type: none"> If complete avoidance of the ten artefacts scatters and 15 isolated find sites recorded within the proposal area is not possible, the artefacts within the development footprint must be salvaged prior to the proposed work commencing and moved to a safe area within the property that will not be subject to any ground disturbance. 	Refer to CoA S3.17.	Requirement addressed under CoA S3.17	NT
AH3	<ul style="list-style-type: none"> The collection and relocation of the artefacts should be undertaken by an archaeologist with representatives of the registered Aboriginal parties. A new site card/s will need to be completed once the artefacts are moved to record their new location on the AHIMS database. 	Refer to CoA S3.17.	Requirement addressed under CoA S3.17	NT
AH4	<ul style="list-style-type: none"> A minimum 5m buffer should be observed around all sites including those outside the development footprint. 	Observations during site inspection.	Exclusion zones remain around heritage sites. These are communicated at site induction and clearly identified on the Overall Array Layout plan.	C
AH5	<ul style="list-style-type: none"> If the complete avoidance of PAD1 and PAD2 is not possible, further archaeological investigation should be undertaken in the form of excavations in order to 	-	Action completed prior to construction and thus not triggered during the Operational Phase of the	NT

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	establish the presence or absence and significance of any sub surface deposits. The excavations would be conducted prior to any development and would be undertaken in consultation with the Registered Aboriginal Parties in compliance with the OEH Code of Practice. A technical report on the results of the testing would be provided and management strategies recommended depending on the outcome. The testing would be conducted by a qualified archaeologist and members of the registered Aboriginal parties. Any monitoring or testing would be undertaken in consideration of OEH advice and outlined through a Cultural Heritage Management Plan.		development.	
AH6	<ul style="list-style-type: none"> First Solar should prepare a Cultural Heritage Management Plan (CHMP) to address the potential for finding additional Aboriginal artefacts during the construction of the Solar Farm and management of known sites and artefacts. The Plan should include the unexpected finds procedure to deal with construction activity. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties. 	Refer to CoA S3.19.	Requirement addressed under CoA S3.19.	C
	Visual			
V1	<p>Solar farm vegetation screening:</p> <ul style="list-style-type: none"> A sparse vegetation screen, 1 -2 rows deep, would be established with reference to Appendix C Proposed onsite screening. The screen would be comprised of varying native species appropriate to the area and of varying height to soften not block the view of the site. Breaks in the screen, reflecting natural breaks in existing remnants would be appropriate. Planting should be undertaken as soon as practical in the construction process depending on the season, as it will take time for the plants to establish and become effective as a screen. Seasonal requirements 	Refer to CoA S3.7 and S3.8	<p>Requirement addressed under CoA S3.7 and S3.8.</p> <p>NC raised under CoA S3.7: The mature vegetative buffer has not yet been established (Site 1), effectively maintained (Sites 2, 3 and 4).</p> <p>Additionally, the Proponent has not yet sought approval from the Secretary as to the effectiveness of the vegetative buffer.</p>	NC raised under CoA S3.7

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	<p>for planting should also be considered.</p> <ul style="list-style-type: none"> The screen would be maintained for the operational life of the solar farm. Dead plants would be replaced. Pruning and weeding would be undertaken as required to maintain the screen's visual amenity and effectiveness in breaking up views. Residential receiver screening Establish plantings for receivers R2 and R8, in consultation with landowners, based on the as-built views of the solar farm. 			
V2	<ul style="list-style-type: none"> Where feasible, underground rather than overhead power lines would be considered. Where feasible, co-location of powerlines would be undertaken to minimise the look of additional power poles. If additional poles are required, these would match existing pole design as much as possible. 	<p>Observations during audit site inspection.</p> <p>Discussions with:</p> <ul style="list-style-type: none"> S&W SO&M Site Manager. LSBP Asset Manager. 	Existing power lines between Goolma Road were relocated underground. All associated infrastructure is underground around the solar farm, including under Goolma road into substation.	C
V3	<ul style="list-style-type: none"> The materials and colour of onsite infrastructure will, where practical, be non-reflective and in keeping with the materials and colouring of existing infrastructure or of a colour that will blend with the landscape. Where practical: <ul style="list-style-type: none"> Proposed new buildings will be non-reflective and colouring will be in keeping with the existing landscape. Pole mounts will be non-reflective. Security fencing posts and wire would be non-reflective; colouring would be chosen to reduce the industrial character of the fence and fit the existing landscape. 	<p>Observations during audit site inspection.</p> <p>Discussions with:</p> <ul style="list-style-type: none"> S&W SO&M Site Manager. LSBP Asset Manager. 	<p>On site infrastructure is considered to comply with the requirements of this mitigation measure.</p> <p>The security fencing posts and wire are galvanised grey, which will become non-reflective in time.</p>	C
V4	<ul style="list-style-type: none"> During construction, dust would be controlled in response to visual cues. Areas of soil disturbed by the project would be rehabilitated progressively or immediately post-construction, reducing 	Refer to CoA S3.14.	Requirement addressed under CoA S3.14.	C

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	<p>views of bare soil.</p> <ul style="list-style-type: none"> Ground cover would be maintained beneath the panels and within the site boundary, to break up views of the infrastructure from the side and back views. Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at main component locations). 			
V5	<ul style="list-style-type: none"> Maintenance of ground cover beneath panels, to reduce dust. Minimise traffic movements on unsealed tracks, to reduce dust. Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at main component locations). 	<p>Observations during audit site inspection.</p> <p>Discussions with:</p> <ul style="list-style-type: none"> S&W SO&M Site Manager. LSBP Asset Manager. 	<p>Benefiting from regular rainfall in recent years, groundcover on site is sufficient to reduce dust.</p> <p>Traffic movements on site are limited to all-weather access roads. Access to site off these roads is by exception only and required for operational maintenance activities.</p> <p>Low intensity security and personal lighting is required for Operational Phase.</p> <p>No complaints have been reported or received regarding intrusive lighting.</p>	C
	NOISE			
N1	<ul style="list-style-type: none"> Implement noise control measures such as those suggested in Australian Standard 2436-2010 “Guide to Noise Control on Construction, Demolition and Maintenance Sites”, to reduce predicted construction noise levels. 	Refer to CoA S3.13	Requirement addressed under CoA S3.13.	C
N2	<ul style="list-style-type: none"> A Noise Management Plan would be developed as part of the CEMP and will specifically target R1 and R7 in order to achieve compliance. The plan would include, but not be limited to: <ul style="list-style-type: none"> Use less noisy plant and equipment where feasible and reasonable Plant and equipment to be properly maintained. Provide special attention to the use and maintenance of ‘noise control’ or ‘silencing’ kits fitted to machines to ensure they perform 	<p>Refer to CoA S4.1</p> <p>Discussion with S&W O&M Site Manager.</p> <p>Feedback register.</p>	<p>Requirement addressed under CoA S4.1.</p> <p>Limited noisy work required during operational phase of the development.</p> <p>No noise related complaints received during construction phase.</p> <p>Considered compliant.</p>	C

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N3	<p>as intended.</p> <ul style="list-style-type: none"> ○ Strategically position plant on site to reduce the emission of noise to the surrounding neighborhood and to site personnel. ○ Avoid any unnecessary noise when carrying out manual operations and when operating plant. ○ Any equipment not in use for extended periods during construction work should be switched off. ○ Complaints procedure deal with noise complaints that may arise from construction activities. Each complaint would need to be investigated and appropriate noise amelioration measures put in place to mitigate future occurrences, where the noise in question is in excess of allowable limits. ● Establish good relations with people living in the vicinity of the site at the beginning of proposal and maintain. Keep people informed, take complaints seriously, deal with complaints expeditiously. The community liaison member of staff should be adequately experienced. 			
N4	<ul style="list-style-type: none"> ● If the ESF is constructed outside the main construction period, a specific construction noise management plan would be undertaken to manage any additional impacts. 	<p>Discussion with S&W O&M Manager.</p> <p>Discussion with LSBP Asset Manager.</p>	<p>ESF is not planned to be constructed at this stage. The requirements of this mitigation measure will apply should works on the ESF be planned and undertaken.</p>	NT
	Historic Heritage			
HH1	<ul style="list-style-type: none"> ● The Applicant must ensure that all new buildings and structure, and any alterations and additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia 	Refer to CoA S2.10	Requirement addressed under CoA S2.10.	C
HH2	<ul style="list-style-type: none"> ● It is understood that, under Part 4A of the EP&A Act, the applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation set out the requirements for the certification of the 	Refer to CoA S2.10	Requirement addressed under CoA S2.10.	C

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	development.			
HH3	<ul style="list-style-type: none"> Should an item of historic heritage be identified, the Heritage Division (OEH) would be contacted prior to further work being carried out in the vicinity. 	Refer to CoA S3.19.	Requirement addressed under CoA S3.19.	C
HH4	<ul style="list-style-type: none"> The Narrawa Homestead should not be altered whilst in use as an Office and Maintenance building for the solar farm. 	<p>Refer to CoA S2.8.</p> <p>Statement of Heritage Impact – Narrawa Homestead, prepared by NGH Environmental, October 2019.</p> <p>Narrawa Homestead addendum Statement of Heritage Impact, prepared by NGH Environmental, February 2020.</p>	<p>Currently in use as a O&M facility.</p> <p>Requirement addressed under CoA S2.8</p>	C
HH5	<ul style="list-style-type: none"> The existing cultural plantings around the Narrawa Homestead and its driveway should be maintained. 	Observation during audit site inspection.	The auditor did not observe any damage or changes to existing plantings around the Narrawa Homestead and its driveway.	C
	TRAFFIC TRANSPORT AND ROAD SAFETY			
T1	<ul style="list-style-type: none"> Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction (the proponent is committed to transporting 80% of construction traffic to the site by bus. Pick up points will be identified in the Traffic Management Plan which will be developed prior to construction). 	Discussion with S&W O&M Site Manager.	<p>This mitigation measure relates to construction and is not triggered in the Operational Phase.</p> <p>Shuttle bus services were reportedly utilised during construction.</p>	NT
T2	<ul style="list-style-type: none"> The proponent would consult with the Roads and Maritime Services regarding the proposed upgrading of the site access from Goolma Road. The upgrade would be subject to detailed design, and must be designed and constructed to the standards specified by RMS Guidelines. 	Refer to CoA S3.4.	Requirement addressed under CoA S3.4	NT
T3	<ul style="list-style-type: none"> A Haulage Plan would be developed with input from the roads authority, including but not limited to: <ul style="list-style-type: none"> Assessment of road routes to minimise impacts on transport infrastructure. Scheduling of deliveries of major components to minimise safety risks (on other local traffic). Consideration of cumulative traffic loads due 	Refer to CoA S3.6.	Requirement addressed under CoA S3.6.	C

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	<ul style="list-style-type: none"> to other local developments. Traffic controls (signage and speed restrictions etc.). 			
T4	<ul style="list-style-type: none"> Upon determining the haulage route(s) for construction vehicles associated with the Project, and prior to construction, undertake a Road Dilapidation Report. The Report shall assess the current condition of the road(s) and describe mechanisms to restore any damage that may result due to traffic and transport related to the construction of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage. 	-	Not applicable to operation phase.	NT
T5	<ul style="list-style-type: none"> A Traffic Management Plan would be developed as part of the CEMP and DEMP, in consultation with the Dubbo Regional Council and Roads and Maritime. The plan would include, but not be limited to: <ul style="list-style-type: none"> The designated routes of construction traffic to the site. Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction. Scheduling of deliveries. Community consultation regarding traffic impacts for nearby residents and school bus operators. Consideration of cumulative impacts, undertaken consultation with Bodangora Wind Farm. Consideration of impacts to the railway. Traffic controls (speed limits, signage, etc.). Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts. Providing a contact phone number to enable any issues or concerns to be rapidly identified and addressed through appropriate procedures. 	Refer to CoA S3.6	Requirements addressed under CoA S3.6	C
T6	<ul style="list-style-type: none"> If the ESF is constructed outside the main construction period, a specific traffic management plan would be undertaken to manage any additional impacts. 	<p>Discussion with S&W O&M Manager.</p> <p>Discussion with LSBP Asset Manager.</p>	<p>ESF is not planned to be constructed at this stage. The requirements of this mitigation measure will apply should works on the ESF be planned and undertaken.</p>	NT
	LAND USE (INCLUDING MINERAL RESOURCES)			
L1	<ul style="list-style-type: none"> Consultation with local community, to minimise 	Assessed as compliant in the Construction Phase IEA	LSBP remains in contact with the local community	NT

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	impact of construction of adjacent agricultural activities and access.	by J2M Systems, February 2020. Discussion with: - S&W O&M Manager. - LSBP Asset Manager. - LSBP Head of Planning, Australia and New Zealand.		
L2	<ul style="list-style-type: none"> Consultation would be undertaken with TransGrid regarding connection to the substation and design of electricity transmission infrastructure. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	Connection to the substation has been completed during construction phase. The requirements of this mitigation measure are not triggered during operational phase.	NT
L3	<ul style="list-style-type: none"> Consultation with proposal site mineral titleholders regarding the proposal and potential impacts. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	No further correspondence reported or evidence provided. Considered to remain compliant.	C
L4	<ul style="list-style-type: none"> A Rehabilitation Plan would be prepared to ensure the array site is returned to its pre solar farm land capability. The plan would be developed with reference to base line soil testing and with input from an Agronomist to ensure the site is left stabilised, under a cover crop or other suitable ground cover. The plan would reference: <ul style="list-style-type: none"> Australian Soil and Land Survey Handbook (CSIRO 2009) Guidelines for Surveying Soil and Land Resources (CSIRO 2008) The land and soil capability assessment scheme: second approximation (OEH 2012) 	Nil	<p>This is considered to be required prior to/during decommissioning and as such is not considered triggered.</p> <p>Aspects of remediation during construction and operations are addressed by the Landscaping Plan and the Biodiversity Management Plan.</p>	NT
	SOILS			
S1	<ul style="list-style-type: none"> The array would be designed to allow sufficient space between panels to establish and maintain ground cover beneath the panels and facilitate weed control. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	No change to design. The constructed array has a full tilt function panel to allow maintenance, including mowing and weed management activities.	C
S2	<ul style="list-style-type: none"> As part of the CEMP, a Soil and Water Management Plan (SWMP) (with erosion and sediment control plans) would be prepared, 	Refer to CoA S3.21 and S3.22	Requirements addressed under CoA S3.21 and S3.22.	C

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	<p>implemented and monitored during the proposal, in accordance with Landcom (2004), to minimise soil (and water) impacts. These plans would include provisions to:</p> <ul style="list-style-type: none"> ○ Carry out soil testing prior to any impacts, to inform any soil treatments and provide baseline information for the decommissioning rehabilitation. ○ Install, monitor and maintain erosion controls. ○ Ensure that machinery leaves the site in a clean condition to avoid tracking of sediment onto public roads which may cause risks to other road users through reduced road stability. ○ Manage topsoil: In all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. Stockpile topsoil appropriately so as to minimise weed infestation, maintain soil organic matter, maintain soil structure and microbial activity. ○ Minimise the area of disturbance from excavation and compaction; rationalise vehicle movements and restrict the location of activities that compact and erode the soils as much as practical. Any compaction caused during construction would be treated such that revegetation would not be impaired. ● Manage works in consideration of heavy rainfall events; if a heavy rainfall event is predicted, the site should be stabilised, and work ceased until the wet period had passed. 			
S3	<ul style="list-style-type: none"> ● A Spill and Contamination Response Plan would be developed as part of the overall Emergency Response Plan to prevent contaminants affecting adjacent surrounding environments. The plan would include measures to: <ul style="list-style-type: none"> ○ Respond to the discovery of existing contaminants at the site (eg. pesticide 	<p>LSBP Environmental Management Strategy, Appendix D – Spill Response Plan.</p> <p>LSBP Environmental Management Strategy, Appendix C – Environmental Incident Response Plan.</p>	<p>The Environmental Management Strategy includes an incident response plan and spill response plan which address the requirements of this mitigation measure.</p>	C

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	<p>containers or asbestos), including stop work protocols and remediation and disposal requirements.</p> <ul style="list-style-type: none"> ○ Requirement to notify EPA for incidents that cause material harm to the environment (refers 147-153 <i>Protection of the Environment Operations Acts</i>). ○ Manage the storage of any potential contaminants onsite. ○ Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and EPA notification procedures and remediation). ○ Ensure that machinery arrives on site in a clean, washed condition, free of fluid leaks. ○ Prevent contaminants affecting adjacent pastures, dams, water courses and native vegetation. ○ Monitor and maintain spill equipment. ○ Induct and train all site staff. 			
S4	<ul style="list-style-type: none"> • A Groundcover Management Plan would be developed in consultation with an agronomist and taking account of soil survey results to ensure perennial grass cover is established across the site as soon as practicable after construction and maintained throughout the operation phase. The plan would cover: <ul style="list-style-type: none"> ○ Soil restoration and preparation requirements ○ Species election ○ Soil preparation ○ Establishment techniques ○ Maintenance requirements ○ Perennial groundcover targets, indicators, condition monitoring, reporting and evaluation arrangements — ie. Live grass cover would be maintained at or above 70% at all times to protect soils, landscape function and water quality. Any grazing stock would be removed from the site when 	<p>Discussion with S&W O&M Site Manager</p> <p>Biodiversity Management Plan including Appendix A – Groundcover Management Plan.</p> <p>Agronomist report</p>	<p>A Groundcover Management Plan has been established and is provided within Appendix A of the Biodiversity Management Plan. A Soil Agronomist has been engaged and one report has been issued.</p> <p>The Groundcover Management Plan has been reviewed and approved by the Secretary.</p>	C

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	<p>cover falls below this level. Grass cover would be monitored on a fortnightly basis using an accepted methodology.</p> <ul style="list-style-type: none"> Contingency measures to respond to declining soil or groundcover condition Identification of baseline conditions for rehabilitation following decommissioning. 			
S5	<ul style="list-style-type: none"> A protocol would be developed in relation to discovering buried contaminants within the proposal site (e.g. pesticide containers). It would include stop work, remediation and disposal requirements. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	Buried contaminants are unlikely to be discovered during the operational phase of the development. Considered to remain compliant.	C
	Hydrology (Surface and groundwater), Water quality and water use			
W1	<ul style="list-style-type: none"> The maximum harvestable right for surface water of approximately 32.05ML would not be exceeded. The WAL would be obtained, should on site ground water sources be used. The proponent would purchase water from Council if onsite requirements are not sufficient. 	<p>Observations during audit site inspection.</p> <p>Discussion with S&W O&M Site Manager.</p>	<p>No dams or water storage features have been established on site and as such the maximum harvestable right for surface water has not been exceeded.</p> <p>LSBP are currently obtaining the relevant water licence for the continued use of the original on site bore for the 20,000L tank.</p> <p>Construction water was purchased from Macquarie Stud Filling Station.</p>	C
W2	<ul style="list-style-type: none"> As part of the CEMP, DOI would be consulted regarding water quality impacts. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	NSW DPIE previously reviewed and approved the Soil, Water and Stormwater Management Plan	C
W3	<ul style="list-style-type: none"> Design waterway crossings and services crossing in accordance with the publications: <ul style="list-style-type: none"> <i>Why do fish need to cross the road? Fish Passage Requirements for Waterway Crossings</i> (Fairfull & Witheridge, 2003); and <i>Policy and Guidelines for Fish Friendly Waterway Crossings</i> (NSW DPI, 2003). <i>Guidelines for Watercourse Crossings on Waterfront Land</i> (NSW DPI, 2012) <i>Guidelines for Laying Pipes and Cable in Watercourses on Waterfront Land</i> (NSW DPI, 	<p>Discussion with:</p> <ul style="list-style-type: none"> S&W O&M Manager. LSBP Asset Manager. LSBP Head of Planning, Australia and New Zealand. <p>Drainage Layout and Drain Cross Section Details, Wellington Solar Farm. Design by Robert Bird Group.</p> <p>Design review register.</p>	<p>Water way crossing designs were completed by the civil design consultant, Robert Bird Group (RBG) and reviewed by LSBP.</p> <p>It was reported in the initial Construction IEA that the civil design consultant has been in contact with the relevant agencies throughout the design process to ensure compliance with all appropriate policies and guidelines specifically regarding the creek crossing and culvert installation.</p>	C

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	2012)			
W4	<ul style="list-style-type: none"> All fuels, chemicals, and liquids would be stored at least 40m from any waterways or drainage lines, not on sloping land and would be stored in an impervious bunded area. 	Observations during audit site inspection.	The auditor did not identify any non-compliance against the requirements of this condition. Due to the operational phase of the project there was minimal fuel and chemical storage on site.	C
W5	<ul style="list-style-type: none"> The proposed network of access roads is to be constructed from gravel, and within the floodplains itself are to be constructed at the existing surface level so as not to result in adverse impact on flood behaviour. Any proposed crossing of existing watercourses should, where possible, consist of fords constructed flush with the bed of the watercourse to minimise any hydraulic impact. 	Observations during audit site inspection	All Internal roadways have been constructed as all-weather roadways and watercourse crossings are fords constructed flush with the bed.	C
W6	<ul style="list-style-type: none"> The refuelling of plant and maintenance would be undertaken in impervious bunded areas on hardstand areas only. 	Observations during audit site inspection.	The auditor did not identify any non-compliance against the requirements of this condition. Due to the operational phase of the project there was minimal need for refuelling on site.	C
W7	<ul style="list-style-type: none"> All potential pollutants stored on-site would be stored in accordance with HAZMAT requirements and bunded. 	Observations during audit site inspection.	The auditor did not identify any non-compliance against the requirements of this condition. Minimal quantities of potential pollutants on site during the operational phase of the project.	C
W8	<ul style="list-style-type: none"> Roads and other maintenance access tracks would incorporate appropriate water quality treatment measures such as vegetated swales to minimise the opportunity of dirty water leaving the site or entering the waterways. 	<p>Observations during audit site inspection.</p> <p>Road Layout designs, Wellington Solar Farm. Design by Robert Bird Group.</p>	Roads and maintenance tracks include vegetated and rock check drainage lines to minimise dirty water leaving the site. Erosion and sediment fencing remains installed in areas more prone to sediment erosion.	C
	Flooding			
F1	<ul style="list-style-type: none"> The design of buildings, equipment foundations and footings for electrical componentry and panel mounts would be designed to avoid the 1% AEP flood level to minimise impacts from potential flooding including: 	<p>Overall site layout.</p> <p>Discussion with:</p> <p>- S&W O&M Site Manager.</p>	<p>The Overall site layout provides for tracker heights varying from 1.22m – 1.83m from natural ground to manage flood risks.</p> <p>Designs of other buildings and facilities have been</p>	C

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	<ul style="list-style-type: none"> The solar array mounting piers are designed to withstand the forces of floodwater (including any potential debris loading) up to the 1% AEP flood event, giving regard to the depth and velocity of floodwaters; The layout of the solar array mounting piers are designed to minimise encroachment within the areas of highest velocity and depth. This may necessitate solar module frame spans in excess of those proposed. The mounting height of the solar module frames should be designed such that the lower edge of the module is clear of the predicted 1% AEP flood level. All electrical infrastructure, including inverters, should be located above the 1% AEP flood level. Where electrical cabling is required to be constructed below the 1% AEP flood level it should be capable of continuous submergence in water. The proposed perimeter security fencing should be constructed in a manner which does not adversely affect the flow of floodwater and should be designed to withstand the forces of floodwater, or collapse in a controlled manner to prevent impediment to floodwater. 	- LSBP Asset Manager	completed to address flooding risks.	
F2	<ul style="list-style-type: none"> The proposed network of access roads is to be constructed from gravel, and within the floodplains itself are to be constructed at the existing surface level so as not to result in adverse impact on flood behaviour. Any proposed crossing of existing watercourses should, where possible, consist of fords constructed flush with the bed of the watercourse to minimise any hydraulic impact. Detailed design of fencing to ensure no adverse impact of the flow of floodwater and ability to withstand floodwater, the design may include removable section or collapsible panels. 	<p>Observations during audit site inspection.</p> <p>Discussion with S&W O&M Site Manager.</p>	Road network, water crossing and fencing onsite appears consistent with the intent and requirements of this mitigation measure. Fencing in creek has been modified to allow high-flows to pass.	C

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F3	<ul style="list-style-type: none"> An Emergency Response Plan incorporating a Flood Response Plan would be prepared prior to construction covering all phases of the project. The plan would: <ul style="list-style-type: none"> Detail who would be responsible for monitoring the flood threat and how this is to be done. Detail specific response measures to ensure site safety and environmental protection. Outline a process for removing any necessary equipment and materials offsite and out of flood risk areas (i.e rotate array modules to provide maximum clearance of the predicted flood level). Consideration of site access in the event that some tracks become flooded. Establish an evacuation point. Define communications protocols with emergency services agencies. 	Fire Management and Emergency Management Plan, revision 2.0 dated 27/04/2020. Prepared by NGH Environmental.	The revised Fire Management and Emergency Management Plan no longer includes a procedure for flood response.	NC
	Resource use and waste generation			
RW1	<ul style="list-style-type: none"> A Waste Management Plan (WMP) would be developed to minimise wastes. It would include but not be limited to: <ul style="list-style-type: none"> Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy. Quantification and classification of all waste streams. Provision for recycling management onsite. Provision of toilet facilities for onsite workers and identify that sullage would be disposed of (i.e., pump out to local sewage treatment plant). Tracking of all waste leaving the site. Disposal of waste at facilities permitted to accept the waste. Requirements for hauling waste (such as covered loads). 	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Waste register maintained.</p>	<p>Minimal waste generation during operational phase.</p> <p>Auditor recommendation:</p> <p>It is recommended that the proponent revisit the Waste Management Plan to ensure it meets the needs of operational requirements, including recycling of damaged panels.</p>	C

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RW2	<ul style="list-style-type: none"> Septic system is installed and operated according to the Dubbo Regional Council regulations. 	Discussion with S&W O&M Site Manager.	The site is currently utilising the existing pump out septic system. Temporary amenities facilities were installed during construction and these were also pump out septic systems.	C
	Community and Socio-economic			
C1	<ul style="list-style-type: none"> Liaison with local industry representatives to maximise the use of local contractors, manufacturing facilities, materials. 	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Discussion with S&W O&M Site Manager.</p>	<p>It was reported that local industry representatives are being contacted as applicable. A local transport operator engaged during the construction phase.</p> <p>Some members of the current operational team are from local area.</p>	C
C2	<ul style="list-style-type: none"> Liaison with local representatives regarding accommodation options for staff, to minimise adverse impacts on local services 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	<p>Not applicable to operational phase.</p> <p>It was reported that Local real estate agents have been engaged to assist with accommodation needs during construction.</p>	NT
C3	<ul style="list-style-type: none"> Liaison with local tourism industry representatives to manage potential timing conflicts with local events. 	<p>Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.</p> <p>Discussion with S&W O&M Site Manager.</p>	<p>Not applicable to operational phase.</p> <p>Local community groups were contracted with regard to the Wellington Show.</p>	NT
C4	The Community Consultation Plan would be implemented to manage impacts to community stakeholders, including but not limited to: Protocols to keep the community updated about the progress of the proposal and proposal benefits. Protocols to inform relevant stakeholders of potential impacts (haulage, noise, air quality etc.). Protocols to respond to any complaints received.	<p>Community Consultation Plan (CCP) Final V2.3.</p> <p>Discussions with:</p> <ul style="list-style-type: none"> - S&W O&M Site Manager. - LSBP Head of Planning, Australia and New Zealand. 	It was reported that Community Consultation have continued throughout the project, including phone call and face to face discussions, and project updates via the website. This is consistent with the measures nominated in the Community Consultation Plan.	C
C5	A site inspection is to be undertaken prior to construction to ensure no watermills would be impacted by the proposal.	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	<p>Not applicable to operational phase.</p> <p>One redundant windmill was relocated.</p>	NT

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C6	<ul style="list-style-type: none"> If the ESF is constructed outside the main construction period, a specific community notification procedure would be undertaken to manage any additional impacts of this installation. 	<p>Discussion with S&W O&M Manager.</p> <p>Discussion with LSBP Asset Manager.</p>	ESF is not planned to be constructed at this stage. The requirements of this mitigation measure will apply should works on the ESF be planned and undertaken.	NT
	Air quality and Climate			
A1	<ul style="list-style-type: none"> Dust generation by vehicles accessing the site and earthworks at the site would be suppressed using water applications or the other means as required. 	Refer to CoA S3.14	Requirements addressed under CoA S3.14	C
A2	<ul style="list-style-type: none"> Vehicle loads of material which may create dust would be covered while using the public road system. 	Refer to CoA S3.14	Requirements addressed under CoA S3.14	C
A3	<ul style="list-style-type: none"> All vehicles and machinery used at the site would be in good condition, fitted with appropriate emission controls and comply with the requirements of the POEO Act, relevant Australian standards and manufacturer's operating recommendations. Plant would be operated efficiently and turned off when not in use. 	Refer to CoA S2.13	Requirements addressed under CoA S2.13	C
	Hazards			
H1	<ul style="list-style-type: none"> Risk control measure would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment). Other risk control measures for unique site-specific hazards would be included. 	Induction presentation and site signage.	<p>Risk controls measures are defined within risk assessments, site induction and site signage.</p> <p>This audit did not assess safety risk assessments.</p> <p>Note: As per WHS legislation, risk controls measures are always open to further review, assessment, and change and as such this condition is considered not-triggered rather than compliant.</p>	NT
H2	<ul style="list-style-type: none"> Once constructed and prior to operation, the operator of the facility will contact the relevant local emergency management committee (LEMC). 	Discussion with S&W O&M Manager.	The O&M Site Manager is currently in consultation (verbal via phone) with the local RFS. Further consultation may also be undertaken following	C

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			outcomes of RFS discussion.	
H3	<ul style="list-style-type: none"> Two copies of the ERP are stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s. 	Site observations during audit site inspection.	Two copies of the ERP are located on the front gate.	C
H4	<ul style="list-style-type: none"> Dangerous or hazardous materials would be stored and handled in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids. 	Observations during audit site inspection.	The auditor did not identify any non-compliance against the requirements of this condition. Minimal quantities of potential pollutants on site during the operational phase of the project.	C
H5	<ul style="list-style-type: none"> Protocols would be developed for lithium-ion battery storage, maintenance, and incident response to mitigate Li-ion fire risks. 	Discussion with LSBP Asset Manager.	Battery storage has not been designed or constructed. No Lithium-ion batteries on site.	NT
H6	<ul style="list-style-type: none"> The transportation of new and waste lithium-ion batteries would comply with the requirements of the Dangerous Goods Code, including specific 'special provisions' and 'packing instructions' applying to the transportation of Li-ion batteries. 	Discussion with LSBP Asset Manager and S&W O&M Site Manger.	It was reported that there has been no transport of lithium-ion batteries.	NT
H7	<ul style="list-style-type: none"> Develop a Bush Fire Management Plan to include but not be limited to: <ul style="list-style-type: none"> Specific management of activities with a risk of fire ignition (hot works, vehicle use, smoking, use of flammable materials, blasting) Incorporation of fire safety and response in staff and contractor induction, training, OHS procedures and Work Method Statements Designation of a staff safety officer tasked with ensuring implementation of the plan and regular liaison with firefighting agencies Document all firefighting resources maintained at the site with an inspection and maintenance schedule Monitoring and management of vegetation fuel loads A communications strategy incorporating use of mobile phones, radio use (type, channels and call-signs), Fire Danger 	Refer to CoA S3.26.	Requirement addressed under CoA S3.26	C

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	<p>Warning signs located at the entrance to the site compounds, emergency services agency contacts</p> <ul style="list-style-type: none"> In developing the Fire Management Plan, NSW RFS would be consulted on the volume and location of water supplies, fire-fighting equipment maintained on-site, fire truck connectivity requirements, proposed APZ and access arrangements, communications, vegetation fuel levels and hazard reduction measures. 			
H8	<ul style="list-style-type: none"> An APZ Of minimum 10 metres would be maintained between remnant or planted woody vegetation and solar farm infrastructure. The APZ around the perimeter of the site would incorporate a 4 metre wide gravel access track. Average grass height within the APZ would be maintained at or below 5 centimetres on average throughout the October-March fire season. Average grass height outside the APZ, including beneath the solar array, would be maintained at or below 15 centimetres throughout the fire season. 	<p>Observations during audit site inspection.</p> <p>Revised project layout.</p>	<p>The project layout accommodates a 10m defendable space around the site, which was observed maintained as an asset protection zone (APZ). The APZ includes an all-weather perimeter road around the development.</p>	C
H9	<ul style="list-style-type: none"> The overhead powerlines at the site would be managed by maintaining appropriate vegetation clearance limits to minimise potential ignition risks, in accordance with the ISSC 3 Guideline for Managing Vegetation Near Power Lines. 	<p>Observations during audit site inspection.</p>	<p>Vegetation appeared managed to minimise potential ignition risks.</p>	C
H10	<ul style="list-style-type: none"> Appropriate fire-fighting equipment would be held on site to respond to any fires that may occur at the site during construction. This equipment will include fire extinguishers, a 1000 litre water cart retained on site on a precautionary basis, particularly during any blasting and welding operations. Equipment lists would be detailed in Work Method Statements. 	<p>Observations during audit site inspection.</p>	<p>A 1000L fire response trailer and fire extinguishers are provided to response to fire emergencies.</p>	C
H11	<ul style="list-style-type: none"> The NSW RFS and Fire and Rescue would be provided with a contact point for the solar farm, during construction and operation. 	<p>Discussion with S&W O&M Manager.</p>	<p>The O&M Site Manager is currently in consultation (verbal via phone) with the local RFS. Further consultation may also be undertaken following outcomes of RFS discussion.</p> <p>Site contact details are displayed at the site gate, along with copies of the Fire Management and</p>	C

Environmental Impact Statement – Revised Mitigation Measures – Submissions Report				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			Emergency Response Plan.	
H12	<ul style="list-style-type: none"> Following commissioning of the solar farm, the local RFS and Fire and Rescue brigades would be invited to an information and orientation day covering access, infrastructure, firefighting resources on-site, fire control strategies and risks/hazards at the site. 	Discussion with S&W O&M Manager.	<p>The O&M Site Manager is currently in consultation (verbal via phone) with the local RFS.</p> <p>An information and orientation day had not yet been organised.</p> <p>Auditor Recommendation:</p> <p>LSBP / S&W to contact the local RFS and Fire and Rescue brigades and organise an information and orientation day covering access, infrastructure, firefighting resources on-site, fire control strategies and risks/hazards at the site.</p>	C
H13	<ul style="list-style-type: none"> The perimeter access track would comply with the requirements for Fire Trails in the PBP guidelines. All access and egress tracks on the site would be maintained and kept free of parked vehicles to enable rapid response for firefighting crews and to avoid entrapment of staff in the case of bush fire emergencies. Access tracks would be constructed as through roads as far as possible. Dead end tracks would be signposted and include provision for turning firetrucks. 	Site observation during audit site inspection.	<p>The project layout accommodates a 10m defensible space around the site, which was observed maintained as an asset protection zone (APZ). The APZ includes an all-weather perimeter road around the development.</p> <p>Dead ends have not yet been signposted, however a site layout plan clearly identifies the internal roads.</p>	C
H14	<ul style="list-style-type: none"> A Hot Works Permit system would be applied to ensure that adequate safety measures are in place. Fire extinguishers would be present during all hot works. Where possible hot works would be carried out in specific safe areas (such as the Construction Compound temporary workshop areas). 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	Hot work permits would be required during operations when relevant activities take place. Considered to comply.	C
H15	<ul style="list-style-type: none"> Machinery capable of causing an ignition would not be used during bushfire danger weather, including Total Fire Ban days. 	Discussion with S&W O&M Site Manager.	It was reported that this condition is taken into consideration during bushfire danger weather.	C
H16	<ul style="list-style-type: none"> Prior to operation of the solar farm, an Emergency Response Plan (ERP) must be prepared in consultation with the RFS and Fire & Rescue NSW. This plan must include but not be limited to: <ul style="list-style-type: none"> Specifically addresses foreseeable on site 	Refer to CoA S3.26	<p>Requirements addressed under CoA S3.26</p> <p>Compliant with recommendation.</p>	C

Environmental Impact Statement – Revised Mitigation Measures – Submissions Report				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>and off site fire events and other emergency incidents.</p> <ul style="list-style-type: none"> ○ Detail appropriate risk control measures to mitigate potential risks to the health and safety of firefighters and other first responders ○ Outline other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site. ○ A copy of the ERP is to be stored in a location directly adjacent to the sites main entry points <ul style="list-style-type: none"> • Once constructed and prior to operation, the operator is to contact with the relevant local emergency management committee regarding the site. 			
H17	<ul style="list-style-type: none"> • All electrical equipment would be designed in accordance with relevant codes and industry best practice standards in Australia 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	AECOM are engaged as the owners Engineer to verify and validate the designs for the project, including an electrical engineer.	C
H18	<ul style="list-style-type: none"> • All design and engineering would be undertaken by qualified and competent person/s with the support of specialist as required. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	AECOM are engaged as the owners Engineer to verify and validate the designs for the project, including an electrical engineer.	C
H19	<ul style="list-style-type: none"> • Design of electrical infrastructure would minimise EMFs. 	Assessed as compliant in the Construction Phase IEA by J2M Systems, February 2020.	No change to overall design.	C
End of EIS MM Checklist.				
End of Audit Table.				

Appendix B: Secretary Approval of Audit Team



Ms Diana Mitchell
Lighsource BP
Lv 10/420 George Street
Sydney NSW 200

29 January 2020

Dear Ms Mitchell

Contact: Jennifer Rowe
Phone: (02) 4247 1851
Reference: SSD 8573

**Wellington Solar Farm (SSD 8573)
Independent Environmental Audit**

I refer to your email dated 24 January 2020 seeking the Secretary's endorsement for an auditor to undertake the Independent Environmental Audit (audit) for the Wellington Solar Farm Project Consent SSD 8573 (**Consent**).

Having considered the qualifications and experience, the Secretary endorses the appointment of Mr Peter Marsham of J2M Systems to undertake the audit in accordance with Schedule 4 Condition 6 of the Consent. This approval is conditional on Mr Peter Marsham being independent of the development.

The audit is to be conducted in accordance with the IAPAR. A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems

The audit report is to:

- include a compliance table indicating the compliance status of each condition of consent;
- not use the term "partial compliance"
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this approval; and
- identify opportunities for improved environmental management and performance.

Within 3 months of commissioning the audit, or otherwise as agreed by the Secretary, Lightsource BP is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Lightsource BP reviews the report to ensure it complies with the relevant approval condition.

Should you wish to discuss this matter please contact Jennifer Rowe on the details above.

Yours sincerely,

Katrina O'Reilly
Team Leader Compliance
as nominee for the Secretary

Appendix C: Consultation

From: Katrina O'Reilly Katrina.OReilly@planning.nsw.gov.au
Subject: RE: Wellington Solar Farm - Operational IEA.
Date: 28 February 2023 at 8:42 pm
To: Peter Marshman peter@j2m.com.au

KO

Good evening Peter,

Sorry for the delay in responding.

The department would consultation to be undertaken with Council, Local Aboriginal Land Councils,
TfNSW, BCD and EPA.

Areas for consideration for operational stage include;

Weed management/ Rehabilitation/landscaping - compliance with conditions and with commitments with the relevant management plans.

Monitoring plans – as required in management plans

Fire mgt and emergency plan compliance with

Operating conditions

Management of Erosion and sediment measures and controls

Stormwater management and compliance with relevant management plans.

Regards

Katrina

Mr Peter Marshman
Director
J2M Systems Pty Ltd
C/- Planning Portal

Notification of Independent Environmental Audit – Wellington Solar Farm

Dear Peter

Thank you for your notification of 8 July 2022 regarding the opportunity to provide comment on the audit to be undertaken at Wellington Solar Farm.

The NSW Department of Primary Industries (DPI) Agriculture collaborates and partners with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

We did email you a response on 19 February 2020 regarding the issues that related to agricultural land and the management of the site for the initial audit request. Specifically, we provided comment on the Conditions of the Project Approval:

BIODIVERSITY MANAGEMENT PLAN (Schedule 3, page 9)

11. Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must:

- (a) include a description of the measures that would be implemented for:*
 - protecting vegetation and fauna habitat outside the approved disturbance areas;*
 - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and*
- (b) include a seasonally based program to monitor and report on the effectiveness of these measures; and*
- (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.*

Note: If the biodiversity credits are retired via a Biobanking Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.

We commented at the time that this condition relates to biodiversity management, the "salvage of vegetative and soil resources" relates to the restoration of the site post-construction and its in situ functioning during the life of the project, particularly from a soils aspect. How the salvage occurs and final placement of the vegetative and soil resources for the ongoing operation of the area is a key to the ongoing successful revegetating of the site to protect the soil resource. Issues such as settling, ponding, erosion potential etc need to be avoided so this will require ongoing monitoring

particularly over the first 12 months of soil placement. It is now over 2 years with substantially more rainfall and storm activity that may have impacted on the stability of the land and vegetative growth that would be useful to measure.

Related to this is the ongoing land management of the site that will be based on native pasture establishment and its ongoing management. This relates to the general condition in Schedule 3 (Page 8):

LAND MANAGEMENT

9. *Following any construction or upgrading on site, the Applicant must:*

- (a) restore the ground cover of the site as soon as practicable, but within 12 months of completing any construction or upgrades, using suitable species;*
- (b) restore and maintain the ground cover with appropriate perennial species; and*
- (c) manage weeds within this ground cover*

Again, this condition is all part of the basis for a groundcover management plan which links to the soil placement issue and protection of the soil resource. At that time, we commented on the prevailing dry conditions that may have seen the restoration of groundcover with perennial species as challenging. With the last 2 years of more rain, it will be of interest to observe how this has changed in terms of groundcover density and species composition, as well as the weed occurrence in the solar farm area. Associated with this is how the site has been managed to ensure groundcover is maximised with the more desirable species i.e., perennial grasses. The land management over this time is useful to describe, and the measures used to ensure grass species persistence and weed control have been considered. Other management such as the application of soil ameliorants, fertiliser etc should also be included.

Lastly the climatic conditions between audit periods should form part of setting the context for the audit.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me on 0427949987 or by email at landuse.ag@dpi.nsw.gov.au.

Sincerely



Mary Kovac

Agricultural Land Use Planning Officer
Strategic Policy and Initiatives
Central West Orana Region

4 August 2022

Our ref: OUT22/9927

Peter Marshman
J2M Systems Pty Ltd
Email: peter@j2m.com.au

11 July 2022

Subject: Wellington Solar Farm (SSD-8573) Independent Audit

Dear Peter,

I refer to your request to the Planning Portal seeking advice from the Department of Planning and Environment (DPE) Water on an upcoming audit for the above matter. It is understood this consultation is in accordance with the requirements of Condition 18, Schedule 4 of project approval SSD-8573 for the Wellington Solar Farm.

DPE Water understands that the scope of the audit as outlined under the development consent and the reference guideline, "*Independent Audit Post Approval Requirements (2020)*" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

DPE Water requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- Condition D21 – A Stormwater Plan is prepared, approved and implemented.
- Condition D22(a and b)– sediment and erosion controls are in accordance with relevant guidelines.
- Condition D22(c) – works within waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012).
- Any water take at the site via storage, diversion, interception or extraction is authorised by a relevant Water Access Licence or exemption under the *Water Management Act 2000* or Water Management (General) Regulation 2018.

Department of Planning and Environment



Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments at water.assessments@dpie.nsw.gov.au, or me at Tim.Baker@dpie.nsw.gov.au or 0428162097

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Z. Baker".

Tim Baker
Senior Project Officer
Water Assessments
Department of Planning and Environment: Water



Heritage NSW

Our ref: HMS ID 1254

Peter Marshman
Director
J2M Systems Pty Ltd

By email: peter@j2m.com.au

Dear Mr Marshman

Notification of Independent Environmental Audit – Wellington Solar Farm (SSD-8573-PA-21)

Thank you for your referral to Heritage NSW seeking feedback on the scope of an Independent Environmental Audit of the Wellington Solar Farm Project.

Heritage NSW has no comments on the audit scope with respect to environmental heritage as the project site does not contain any items listed on the State Heritage Register.

We note that you have received a separate response from Heritage NSW with respect to Aboriginal Cultural Heritage matters.

If you have any questions regarding the above advice, please contact Lily Chu, Senior Assessment Officer at Heritage NSW on 9873 8595 or lily.chu@environment.nsw.gov.au.

Yours sincerely

Michael Ellis.

Michael Ellis
Manager Assessments
Heritage NSW
Department of Planning & Environment
As Delegate of the Heritage Council of NSW
1 August 2022

From: [Nicole Davis](#)
To: peter@j2m.com.au
Subject: Heritage NSW - Aboriginal cultural heritage (ACH) - Proponent Request for Advice - Wellington Solar Farm - Notification of IEA (SSD-8573-PA-21) (Dubbo Regional)
Date: Wednesday, 13 July 2022 5:25:00 AM
Attachments: [image001.png](#)
[image004.png](#)

Hi Peter,

Thank you for your referral to Heritage NSW dated 8 July 2022, in relation to the Notification of Independent Environmental Audit – Wellington Solar Farm (SSD-8573-PA-21) (Dubbo Regional), and your request for feedback on the scope and environmental performance. Heritage NSW has no comments on the project or audit scope - with respect to Aboriginal cultural heritage (ACH). If you require any further information please contact me directly.

Kind Regards
Nicole Davis

Nicole Davis
Manager Assessments
Heritage NSW
Department of Planning and Environment

T 02 4927 3156 **M** 0409 394 343 **E** nicole.davis@environment.nsw.gov.au

Locked Bag 5020 Parramatta 2124

Working Days Monday to Friday



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

From: no-reply@majorprojects.planning.nsw.gov.au <no-reply@majorprojects.planning.nsw.gov.au>
Sent: Friday, 8 July 2022 12:48 PM
To: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>; Erin McWhirter <Erin.McWhirter@environment.nsw.gov.au>; Andre Quinon <andre.quinon@environment.nsw.gov.au>; Sirena Larsson <sirena.larsson@environment.nsw.gov.au>
Subject: Major Projects – Proponent Request for Advice - Wellington Solar Farm - Notification of IEA (SSD-8573-PA-21) (Dubbo Regional)

A proponent is requesting advice in relation to a post approval matter for the Wellington Solar Farm.

Please sign in to your account to view the details of this request and to upload your advice.

If you have any enquiries about this request, you can contact Peter Marshman at peter@j2m.com.au.

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning and Environment



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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL





Our ref: DOC22/644916

Your ref: SSD 8573

Peter Marshman
Director
J2M Systems Pty Ltd
peter@j2m.com.au

Dear Peter

Wellington Solar Farm – Independent Environmental Audit

I refer to your referral through the Major Projects Portal dated 8 July 2022 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment seeking input into an independent environmental audit of the Wellington Solar Farm.

BCS's main issues regarding the project that we suggest for review as part of the audit are:

- Confirmation that the vegetation buffers (landscape screening) at the locations identified in the figure in Appendix 1 of the project consent have been established.
- Confirmation that all offset requirements as set out in Condition 10 of Schedule 3 of the project consent have been retired.
- Confirmation that the actions within the Biodiversity Management Plan are being implemented.

If you require any further information regarding this matter, please contact David Geering, Senior Conservation Planning Officer, via david.geering@environment.nsw.gov.au or (02) 6883 5335.

Yours sincerely

Samantha Wynn
Senior Team Leader Planning North West
Biodiversity, Conservation and Science Directorate

27 July 2022



File Ref. No: FRN17/1264 BFS22/3423 8000022433
TRIM Doc. No: D22/65897
Contact: Senior Firefighter Lachlan Haar

3 August 2022

Peter Marshman
J2M Systems Pty Ltd
PO Box 163
NEWPORT BEACH NSW 2106

Dear Peter,

Re: Notification of Independent Environmental Audit –Request for feedback on scope and environmental performance – Wellington Solar Farm (SSD-8573)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 8 July 2022, requesting advice on the Independent Environmental Audit for Wellington Solar Farm (SSD-8573).

FRNSW note that Condition 23 of the Development Consent for SSD-8573 requires that:

'At least one month prior to the commencement of construction of the development, or unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study for the development, in consultation with Fire & Rescue NSW, and to the satisfaction of the Secretary.'

The study must:

(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines'; and

(b) report on the implementation status of the mitigation measures, listed in the EIS. Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.'

To date the applicant has not consulted with FRNSW in relation to the development of the fire safety study for the premises. A meeting was held on 3 July 2019 however this related to the *Fire Management and Emergency Response Plan*, not the Fire Safety Study for the premises.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS22/3423. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



Superintendent John Hawes
Manager
Operational Liaison and Special Hazards Unit

Cc: peter@j2m.com.au

SSD-8573
Parcel 46470
DTQ:DQ

16 August 2022

J2M Systems Pty Ltd
PO Box 163
NEWPORT BEACH NSW 2106



Dear Mr Marshman

RE: SSD 8573 Wellington Solar Farm

PROPERTY: Lots 89-92, 99 and 102-104, DP 2987, Lot 1, DP 34690, Lot 1, DP 520396 and Lot 2, DP 807187. 6808 Goolma Road, Wuuluman

I refer to the abovementioned State Significant Development 8573 Modification 2, and to your letter dated 8 July 2022, attached to your email dated 12 July 2022, seeking feedback or comments into the scope of the audit and the environmental performance of the project.

As such, the following comments are provided:

Schedule 2 Administrative Conditions

WORK AS EXECUTED PLANS

7. The condition relates to the applicant submitting Work-As-Executed plans to the Department. Council has previously requested that the Work-As-Executed plans be forwarded to Council for our records. If these plans could be forwarded to Council that would be appreciated.

NARRAWA HOMESTEAD

8. Council is unaware whether the Homestead has been repurposed as an operations and maintenance facility.

Schedule 3 Environmental Conditions – General

LANDSCAPING

7. An inspection of the site has confirmed that the mature vegetation buffer (landscape screening) does not appear to have been established as per Appendix 1.



All communications to: **CHIEF EXECUTIVE OFFICER**

ABN 53 539 070 928

PO Box 81 Dubbo NSW 2830

T (02) 6801 4000 **F** (02) 6801 4259 **E** council@dubbo.nsw.gov.au

Civic Administration Building Church St Dubbo NSW 2830

W dubbo.nsw.gov.au

LANDSCAPE PLAN

8. It does not appear that the Applicant has prepared a detailed Landscaping Plan for the development.

BIODIVERSITY

10. Council is unaware whether the Applicant has retired the biodiversity credits as required by the condition. Council made enquiries with BCS and BCT but is yet to receive any response.

If you have any enquiries in this matter, please do not hesitate to contact Mr Quigley during normal office hours, on 6801 4000.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Quigley', with a stylized flourish at the end.

Darryll Quigley
Manager Building and Development Services

Appendix D: Independent Audit Declaration Form

Independent Audit Declaration Form


Project Name	Wellington Solar Farm
Consent Number	SSD 8573 Mod 2
Description of Project	Solar Farm (Operation)
Project Address	Goolma Road, Wuuluman NSW
Proponent	Lightsource BP
Title of Audit	Operational Independent Environmental Audit – Wellington Solar Farm
Date	12 April 2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Audit	Peter Marshman
Signature	
Qualification	Lead EMS Auditor – Exemplar Global No. 114942
Company	J2M Systems Pty Ltd
Company Address	P.O. Box 163 Newport Beach NSW 2106

Appendix E: Site Inspection Photographs.

Site Inspection Photographs

A site inspection was carried out as part of this audit with the following photos taken of key work areas and environmental control measures.



Photo 1: Site entrance and signage



Photo 2: Internal access tracks as all-weather access.



Photo 3: Perimeter access tracks and asset protection zone.



Photo 4: Internal drainage lines with culverts.



Photo 5: Inverter station



Photo 6: Boundary of solar array (left) and Endangered Ecological Community (right).



Photo 7: Endangered Ecological Community no-go exclusion zone.



Photo 8: Evidence of coarse woody debris relocated for beneficial reuse.



Photo 9: Endangered Ecological Community no-go exclusion zone.



Photo 10: Perimeter road and rock lined dish draining channel.



Photo 11: Example of rock lined drainage channel and under array culvert.



Photo 12: Perimeter gate with moveable storm flow barrier.



Photo 13: Evidence of weeds within the solar array.



Photo 14: Evidence of weeds within the greater project boundary, but outside the primary solar farm fence line.



Photo 15: Evidence of maintained dish drains on site.



Photo 16: General overview of project area. Recent rainfall has increased the quality of groundcover.



Photo 17: Evidence of erosion and sediment control fencing used in key drainage area on site.



Photo 18: Evidence of erosion and sediment control fencing used in key drainage area on site.



Photo 19: Culvert at Wuulman Creek.



Photo 20: Culvert at Wuulman Creek.

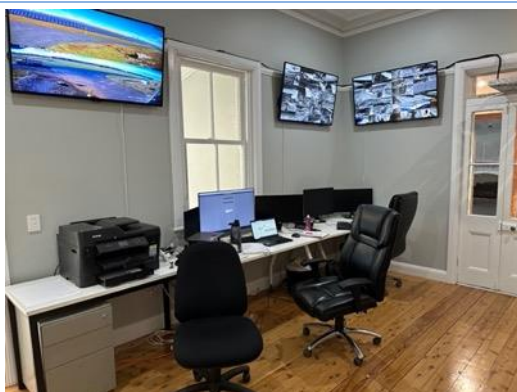


Photo 21: Narrawa Homestead utilised as Operation and Maintenance Facility.



Photo 22: Narrawa Homestead utilised as Operation and Maintenance Facility.



Photo 24: Evidence of coarse woody debris relocated for beneficial reuse.



Photo 23: Evidence of coarse woody debris relocated for beneficial reuse.



Photo 25: Exclusion zone maintained around Aboriginal heritage scar tree.



Photo 26: Maintenance compound and hardstand.



Photo 27: Portable firefighting trailer and water tank.



Photo 28: Damaged solar panels for recycling.



Photo 29: General waste bin provided in maintenance compound.



Photo 30: Evidence of sheep grazing within solar array.



Photo 31-32: General examples of ground cover side on and top-down view. Western side of Solar Farm.



Photo 33-34: General examples of ground cover side on and top-down view. Middle of Solar Farm.



Photo 35-36: General examples of ground cover side on and top-down view. Easter side of Solar Farm.



Photo 37-38: General examples of ground cover side on and top-down view. Easter side of Solar Farm.