



# Distribution and Authorisation Record

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Final V3	04 December 2025	Michelle Housego, Lightsource bp	DPHI comments included: Section 2.2, 3.3 and Appendix E, Item 23

This report has been prepared and reviewed in accordance with our quality control system.

This report has been prepared by:

#### **Grant Brown**

Lead Environmental Auditor

Date: 11 July 2025

Reviewed by:

#### **Anita Rylah**

Technical Reviewer Date: 11 July 2025

Finalised and issued by:

#### **Grant Brown**

Lead Environmental Auditor Date: 04 December 2025 © Copyright APP Corporation Pty Ltd ABN: 29 003 764 770

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#### 1. Executive Summary

The Goulburn River project consists of a 585 MWp solar farm and battery energy storage system (BESS), located between Wollar and Merriwa, on Wollara Road, in the Upper Hunter Region of NSW. Lightsource bp (LSbp) will construct and operate the project and deliver renewable energy to Australia's grid. Lightsource bp have appointed DT Infrastructure (DTI) as the head contractor for the construction of this development.

The project includes a battery to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network.

This Audit Report presents the outcomes of the first independent environmental audit of the project, conducted for the assessment of environmental controls established by LSbp and DTI against the requirements of State Significant Development SSD-33964533 for the project, in accordance with the *Independent Audit Post Approval Requirements* (IAPAR 2020).

The Determination of Consent SSD-33964533 was given on 22 August 2024, with the commencement of construction being 14 April 2025. The audit was conducted by The APP Group (APP) on 18 June 2025 which encompassed a review of Schedule 2 Parts A, B, C and Appendices of the SSD-33964533 Development Consent. The audit period is therefore defined as 22 August 2024 up to and including 18 June 2025, with the audit being undertaken within 12 weeks of the commencement of early construction critical works.

Construction works are in early stages, with road and access works providing most of the activity to date. Early works involving the accommodation camp and the substation bench are progressing through early stages of construction.

Throughout the audit process LSBP and DTI have generally demonstrated compliance with the conditions of Development Consent SSD-33964533 with the exception of two identified non-compliances linked to a self-reported non-compliance with Condition B17.

The independent environmental audit assessed a total of 90 conditions of consent comprising of a review of documents and records, interviews with key personnel and a site inspection.

#### Site inspection

During the audit, a site inspection was undertaken to review environmental controls in place.

Refer to Section 6.4 for further details with photos included under Appendix G.

#### **Findings**

There was one self-reported non-compliance identified during the audit period; however this triggered a non-compliance against two conditions, A3 and B17. No Opportunities for Improvement (OFI) were raised.



Table 1 - Audit Findings

Finding No.	Condition of Consent	Audit Finding Details
Non- Compliance GRSF-01_NC- 01	A3. The development may only be carried out:  a. in compliance with the conditions of this consent  B17. Construction, Upgrading and Decommissioning Hours Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:  a. 7 am to 6 pm Monday to Friday;  b. 8 am to 1 pm Saturdays; and at no time on Sundays and NSW public holidays.	A self-reported non-compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours.  Construction activities occurred outside the approved construction hours on Sunday, 25 May 2025. The final demobilisation of the 5 Mile Rest Stop worksite was scheduled for 26 May 2025; however, due to forecast rainfall and the associated risk of sediment runoff, the contractor removed the material stockpile on Sunday, 25 May 2025, without obtaining prior approval. Three truck & dogs from the 5 mile rest area (Golden Hwy) moved VENM to the council borrow pit. Each truck undertook three trips each.  The non-compliance was notified to DPHI on 28 May 2025 and follow up correspondence sent to DPHI on 10 June 2025 with updated information. On 13/06/2025, DPHI requested further information from the project, due by 23/06/2025. A response to DPHI was still being drafted at the time of the audit.  A non-compliance is therefore triggered against condition A3(a) and condition B17(c).

Details of these findings are included within the Audit Checklist (Appendix D) of this report.



#### 2. Introduction

#### 2.1 Background

The Goulburn River project consists of a 585 MWp solar farm and battery energy storage system (BESS), located between Wollar and Merriwa, on Wollara Road, in the Upper Hunter Region of NSW. Lightsource bp (LSBP) will construct and operate the project and deliver renewable energy to Australia's grid. Lightsource bp have appointed DT Infrastructure (DTI) as the head contractor for the construction of this development.

The Development Consent was issued on 22 August 2024, defining the scope of this audit. The project includes a battery system designed to shift renewable energy to night-time peak periods and support the reliable operation of Australia's electricity grid. Additionally, it comprises operation and maintenance buildings, a temporary onsite workers' accommodation camp, and the necessary electrical infrastructure to connect to the existing electricity network.

Construction activities have been staged and consist of the following at the time of the audit. Road Upgrades commenced on 7<sup>th</sup> February 2025. At the time of the audit, the following had been completed:

- Upgrade of Golden Highway and Ringwood Road intersection
- U-turn facility on Barnett Street (off Golden Highway)

Upgrades to Ringwood Road and Wollara Road were ongoing at the time of the audit.

Limited Early Construction Solar Farm (Planning Secretary approval 12<sup>th</sup> April 2025) commenced on the 14<sup>th</sup> April 2025 with the following construction activities:

- Preparation of the switchyard pad (substation bench)
- Preparatory works for the temporary workers accommodation (TWA) facility.
- Establishment of environmental controls, including erosion and sediment controls, heritage no-go zones and temporary ecological no-go zones.
- Demolition of existing farmhouse

Main construction works commenced on 29<sup>th</sup> May 2025, following the practical completion of the Golden Highway/Ringwood Road intersection and remain ongoing at the of this audit, activities include:

- Internal Roads
- Pre-clearing works
- · Establishment of site office
- Bulk earthworks and general site-wide cut and fill, including the substation bench and TWA

Establishment of environmental controls, including erosion and sediment controls, heritage no-go zones and temporary ecological no-go zones. The project is expected to be completed in 2027.

Lightsource bp (LSbp) is the Proponent for the development and has appointed DT Infrastructure (DTI) as the head contractor. LSbp engaged The APP Group (APP) to undertake an independent environmental audit on 18 June 2025. The audit was conducted in compliance with Condition C37 of the Development Consent SSD-33964533, which states:

**Condition C15**: Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).



#### 2.2 Project Details

Table 2 - Project Details

Project Name	Goulburn River Solar Farm
Project Application No.:	SSD-33964533
Project Address:	Wollara Road, Merriwa, NSW 2329
Project Phase:	Construction
Project Activity Summary:	The following is a summary of the works that were in progress at the time of audit:  Road upgrades  Site establishment  Transgrid pad construction  Workers accommodation early works

#### 2.3 Audit Team

Details of The APP Group independent environmental auditing team as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Table 3 - Auditor Qualifications

Name	Company	Position	Certification
Grant Brown	APP	Lead Environmental Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C-461697
Sanan Qasim	APP	Auditor Assistant	Exemplar Global Lead Environmental Auditor – Certificate No. C-467153

The auditor approval letter from DPHI for this audit is attached as Appendix C. Independent Audit declaration forms are included as Appendix D.

### 3. Audit Objectives and Scope

#### 3.1 Audit Objectives

The objective of this audit was to undertake an independent environmental review of the project in compliance with Development Consent SSD-33964533 Condition C15, in accordance with the requirements for an independent audit methodology and independent audit report in the Independent Audit Post Approval Requirements (IAPAR 2020).



#### 3.2 Audit Scope

The scope of this audit involved the review of project compliance against the conditions of SSD-33964533 Schedule 2, Parts A, B, C and Appendices, including the following:

- Review of implementation of management plans, including:
  - Project Environmental Management Strategy
  - **Biodiversity Management Plan**
  - Traffic Management Plan Rev. 3
  - Heritage Management Plan
  - Other Plans and documents refer to Section 5 Document Review
- Site inspection conducted on 18th June 2025
- Review the environmental performance of the project;
- Review of environmental records; and
- Interviews with site personnel.

#### 3.3 Audit Period

This was the first independent environmental audit of the project. It covers the review of environmental documentation and records of the pre-construction, early works, and construction works for the period from the issue of the Development Consent on 22 August 2024 to the completion of the audit site inspection on 18 June 2025.

#### 4. Audit Methodology

#### 4.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is included under Appendix C.

#### 4.2 Audit Scope Development

APP developed the audit scope and a checklist based on the Project Requirements set out in the Development Consent SSD-33964533, Schedule 2 – refer to Appendix E of this report. Consultation with project stakeholders was also undertaken as part of the scope development as per Section 4.6.

#### 4.3 Audit Process

#### 4.3.1 Opening Meeting

An opening meeting was held with personnel from LSBP, DTI and APP as per the Audit Attendance Sheet (Appendix B) on 18 June 2025 at 8:00am.

Key items were discussed as follows:

- Confirmation of the purpose and scope of the audit
- Overview of the Project and status of the works
- Occurrence of environmental incidents and non-compliances, if applicable
- Overview of the audit process in accordance with the Schedule 2 Consent Conditions, Project Staging Report, and the Independent Audit Post Approval Requirements (IAPAR 2020).



#### 4.3.2 Conduct of Audit

Audit activities included the following:

- Conduct of a site inspection led by DTI to review implementation of mitigation measures and environmental controls.
- Review of the project documentation to verify compliance with the SSD-33964533 Schedule 2 conditions,
- Conduct of the audit based on the checklist with the Conditions of Consent, interviews with personnel and review of records provided as evidence of compliance, and
- Discussion of any identified findings and actions noted during the site inspection.

#### 4.3.3 **Closing Meeting**

The closing meeting was held on 18th June 2025 at 3:00pm with representatives of LSBP, DTI and APP. General feedback and the audit findings were discussed during the closing meeting.

The APP lead auditor acknowledged the efforts made in preparing for the audit, cooperation, and openness of LSBP and DTI personnel during the conduct of this audit.

#### 4.4 Interviewed Persons

Name and position of persons interviewed:

Table 4 - Personnel Interviewed

Name	Organisation	Position
Michelle Housego	LSBP	Senior HSE Advisor
Rachel Hannah	LSBP	Environmental Advisor
Brendan Toohey	DTI	Environmental Manager
Rachel So	DTI	Environmental Advisor
Chris Doherty	LSBP	Site Manager
Linkon Knott	DTI	Logistics Manager

#### 4.5 Site Inspection

A site inspection was carried out on 18th June 2025 from approximately 9:00am to 11:00am with representatives of LSBP, DTI and the APP auditor. Minor construction works were underway at the time of inspection, with no observations identified. Refer to details of the inspection in Section 6.4 of this report and site photos included under Appendix G.



#### 4.6 Consultation

Consultation with the Department of Planning Housing and Infrastructure (DPHI) was sent in advance of the audit (28th April 2025) to request feedback on the project as per the Independent Audit Post Approval Requirements (IAPAR 2020) Section 3.2.

The Department responded 30th April 2025 and confirmed they had no additional matters for inclusion within the scope of the audit that are not already captured by the Consent and the NSW Planning's Independent Audit Post Approval Requirements.

Refer to Appendix F for a copy of the consultation.

#### 4.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Table 5 - Audit Criteria

Rating	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.

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

#### 5. Document Review

- Demolition Certification No. 750956 dated 22/05/25
- Demolition SWMS 27/05/25
- Asbestos Clearance Certificate 30/05/25
- Demolition waste dockets from 3/06/25 to 5/06/25
- Heavy vehicle monitoring Extract from EPC Project Monthly Report January 12 April Road Upgrade work
- LV & HV movements register January to June 2025
- **GRSF** Equipment Tracker
- Various plant maintenance service records
- **GRSF Site Induction**
- Ecology clearance reports 13/01/25, 21/02/25, 28/04/25 and 04/06/25
- Request to variation of hours under condition B17 as per B19 (30/05/25) and consultation with UHSC and TfNSW (20/05/25)
- Soil & Water Management Plan V3 dated February 2025



- Emergency Plan Rev 1 dated 10/02/25
- Hazardous Substance Register and SDS register
- Waste Register up to 03/06/25
- Amended Accommodation and Employment Strategy May 2024
- Camp Management Plan AUS-GRSF-DTI-PMT-PLN-0010 Rev. K dated 16/05/25
- Road Dilapidation Survey Report December 2024
- Staging request to DPHI 06/06/25
- Notification of Commencement of Construction correspondence dated 28/05/25
- Approval to commence for limited/early construction works on the solar farm 12/4/25
- Initial notification to DPHI of non-compliance with B17 dated 28/05/25
- Follow-up notification to DPHI with further information of non-compliance with B17 dated 10/06/25
- Complaints register 24/02/25 to 30/05/25

#### 6. Audit Findings

#### 6.1 Assessment of Compliance

This audit was completed to assess the implementation of the Project Environmental Management Strategy and sub-plans, as well as environmental controls established by DTI for the Project, against Development Consent SSD-33964533, Schedule 2 (90 conditions).

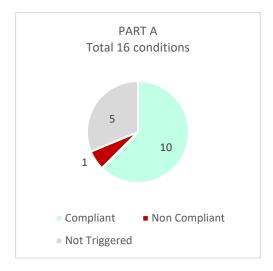
The following table summarises the audit findings by rating category:

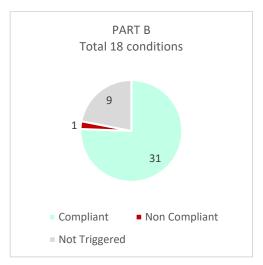
Table 6 - Summary of Findings

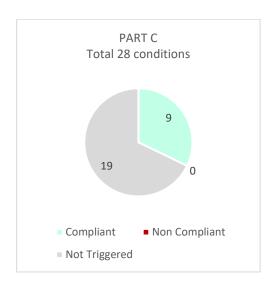
Findings Rating	Findings
Compliant	52
Non-Compliant	2
Not Triggered	36
Total	90

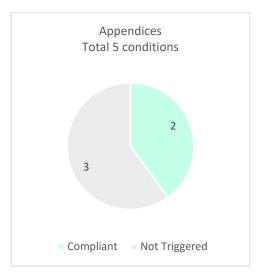


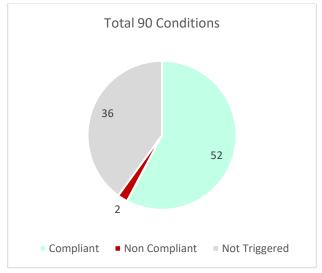
The comparison of audit requirements against the compliance ratings is as follows:













#### 6.2 Notices, Incidents and Complaints

#### 6.2.1 Notices and Incidents

LSBP and DTI confirmed that no notices or formal advisory letters were issued by the Department during the audit period. No reportable incidents have occurred on the Project to date.

#### 6.2.2 Complaints

A Complaints Register is in place where complaint details and status are recorded and is published on the project website.

#### 6.2.3 Non-Compliances

One non-compliance was self-reported during the audit period. This results in one common non-compliance against two conditions of the consent during the scope of this audit.

#### 6.3 Previous Audit Findings

As this is the initial independent environmental audit, there are no previous audit findings to address.

#### 6.4 Audit Site Inspection

A site inspection was conducted of the construction areas with representatives of LSBP, DTI and APP to review the effectiveness of environmental mitigation measures implemented on the site. The main works are based on the solar farm site, with road upgrades continuing to occur on the access roads:

- Signage in place at the Wollara Road Main Site entrance
- ▶ Temporary site office established, with offices, first aid, lunchroom and ablution facilities in place
- Storage facilities established, including diesel & fuel storage
- Waste bins available onsite and observed to be within capacity.
- No mud tracking or dust observed (water cart active on site).
- Spill kits stocked and available.
- Site Safety Noticeboard displayed onsite.
- Erosion & sediment controls in place.
- Topsoil stockpiled separately for future use.
- Heritage No-go zones demarcated

Photos of the site inspection are included in Appendix G.

#### 6.5 Suitability of Plans and the Environmental Management System

As part of the project's environmental management framework, Lightsource bp maintains an Environmental Management Strategy (EMS). The EMS has been prepared for the project to comply with the relevant conditions within the Development Consent, as well as to meet other applicable statutory requirements and obligations during the construction, operation and decommissioning of the Project.

The purpose of this EMS is to:

- Outline the strategic environmental management framework for the construction, operation and decommissioning of the Project.
- Identify the statutory approvals that apply to the Project.



- Identify the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Project.
- Establish procedures to:
  - o Inform the community and relevant Government agencies about the operation and environmental performance of the Project.
  - Manage and respond to complaints and resolve any disputes.
  - Respond to any non-compliances or emergencies.
- Outline the monitoring program for the Project, to ensure ongoing compliance with all relevant statutory approvals

Other project plans have been developed with the assistance of SME's (where required), in consultation with government departments, authorities, councils, and stakeholders (where required), and in accordance with the consent conditions. These include the Biodiversity Management Plan, Traffic Management Plan, Heritage Management Plan, Emergency management Plan, and the Soil and Water Management Plan. No updates to the plans were required during the initial audit period.

Implementation of the Environmental Management Strategy and other management plans was verified during the review of records and as demonstrated during the site inspection, with all plans deemed to be suitable for the current stage of the works with only improvement opportunities identified.

#### 6.6 Actual vs Predicated Impacts

An assessment of actual impacts was undertaken via a review of documentation prior to and during the audit, and via observations made during the site inspection. Predicted impacts are described in the Environmental Impact Statement for the project, prepared by Umwelt, dated 3rd May 2023. Section 6 of the EIS contains a summary of the Assessment and Mitigation of Impacts and includes categories for Biodiversity, Heritage, Land, Visual Amenity (including glint and glare), Noise, Transport, Water, Hazards, Social Impact, Economics, and Waste.

When comparing actual vs predicted impacts the following factors have been considered:

- the occurrence of environmental incidents
- compliance history against the conditions of consent and adherence to the approved management plan
- number of and frequency of internal actions raised during site inspections
- the nature and frequency of complaints
- regulatory notices
- consistency of designs with the EIS; and
- any planning approval modifications.

The Project is noted to have demonstrated a strong level of environmental performance during the audit period, despite one non-compliance that was self-reported. The Project continues to effectively implement the environmental management plans to mitigate impacts and has taken steps to ensure no further noncompliances with the conditions of consent are recorded. In general, the Auditor considers that the Project's actual environmental impacts are consistent with the EIS predictions, with the following items to note as relevant during the audit period:

#### Biodiversity



- The Project continues to implement a comprehensive biodiversity mitigation strategy and undertakes ecological surveys and relocations as required.
- Demarcation of No-Go Zones are established for ecological areas as required.
- Biodiversity credits for critically endangered habitat and species have been retired.

#### Heritage

- An unexpected finds procedure has been developed for the project. No heritage impacts or unexpected heritage finds have occurred to date.
- The heritage listed Slab Hut and heritage item 37-01-1027 are demarcated No-Go Zones.

#### Noise and Vibration

- Construction noise levels for the Ringwood Road upgrades were predicted to exceed the established Noise Management Levels at some receivers, and as such, appropriate noise mitigation and management strategies are implemented.
- There have been no noise or vibration complaints to date.
- Construction works are undertaken during standard construction hours, and community notifications are provided to noise sensitive receivers.



#### Traffic and Transport

- The Construction Traffic Management Plan continues to be in place. The plan considers working hours, oversize/overmass vehicle movements, and site access.
- Traffic impacts have been limited to date as the project is in the early stages of construction.
- No traffic complaints or non-compliances have been received.

#### Bushfire Hazard Management

- The Emergency Management plan has been approved and in place. This has been developed with consultation with NSW RFS.
- The project will be installing a Pano Al powered Bushfire Detection and Situational Awareness system for early detection of bushfires. The system was sighted by the auditor on site awaiting installation.

#### Other items

- No contamination identified during the audit period.
- Stormwater was contained within the site, with erosion and sediment controls installed as per the CPESC certified ESCP's.
- Waste management is in place, with a waste contractor currently servicing site. The contractor is in the final stage of appointing a permanent waste contractor (contract yet to be executed).
- Air quality (dust) is being managed with through the application of water with water carts.

Based on the outcome of the audit and controls observed during the site inspection, no significant changes or additional impacts were noted for the design and construction works as compared to the predicted impacts stated in the Environmental Impact Assessment. It is of the auditor's opinion that the mitigation measures included in Section 6 of the EIS were generally being appropriately implemented during the audit period.

#### 6.7 Key Strengths

Mitigation controls for environmental management of the site were generally observed for the project, in compliance with the consent conditions SSD-33964533. The following key strengths were noted:

- Strong collaboration between the DTI and LSBP teams demonstrated with responsibility of conditions requirements clearly assigned to meet compliance.
- Clear communication protocols established for roadworks on local roads approaching the solar farm site.
- Installation and maintenance of environmental controls and established no-go zones (for heritage and ecological protection)
- Proactive measures undertaken to address actions onsite.

#### 6.8 Audit Findings and Recommendations

Throughout the audit process LSBP and DTI have generally demonstrated compliance with the conditions of Development Consent SSD-33964533 and shown implementation of the Environmental Management Strategy and project plans in accordance with the project requirements, with the exception of two identified noncompliances linked to a self-reported non-compliance with Condition B17.

The self-reported non-compliance with B17 is currently being addressed by LSBP with a response to DPHI RFI dated 25 May 2025 being prepared at the time of the audit. The auditor recommends a response to the



Department as soon as practical which includes improvements made to the projects systems and processes to avoid future non-compliances.



#### Table 6 - Findings

Finding No.	Condition of Consent	Audit Finding Details
Non- Compliance GRSF-01_NC-01	A3. The development may only be carried out:  b. in compliance with the conditions of this consent  B17. Construction, Upgrading and Decommissioning Hours Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:  b. 7 am to 6 pm Monday to Friday;  c. 8 am to 1 pm Saturdays; and d. at no time on Sundays and NSW public holidays.	A self-reported non-compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours.  Construction activities occurred outside the approved construction hours on Sunday, 25 May 2025. The final demobilisation of the 5 Mile Rest Stop worksite was scheduled for 26 May 2025; however, due to forecast rainfall and the associated risk of sediment runoff, the contractor removed the material stockpile on Sunday, 25 May 2025, without obtaining prior approval. Three truck & dogs from the 5 mile rest area (Golden Hwy) moved VENM to the council borrow pit. Each truck undertook three trips each.  The non-compliance was notified to DPHI on 28 May 2025 and follow up correspondence sent to DPHI on 10 June 2025 with updated information. On 13/06/2025, DPHI requested further information from the project, due by 23/06/2025. A response to DPHI was still being drafted at the time of the audit.  A non-compliance is therefore triggered against condition A3(a) and condition B17(c).

# Appendix A – Audit Agenda





Project	Independent Environmental Audit – Goulburn River Solar Farm
Proponent	Lightsource bp
Contractor	DT Infrastructure
Location	Wollara Rd, Merriwa
Date and Time	18 <sup>th</sup> June 2025 8:00 AM – 3:30 PM
Auditing Team	Grant Brown (Lead Independent Auditor)
Site contact	Michell Housego (Senior HSE Advisor)
Audit criteria	Development Consent SSI-33964533, and in accordance with the Independent Audit Post Approval Requirements (IAPAR 2020)
Audit scope	Initial construction audit, from commencement of construction

## Agenda

ltem	Time	Required Personnel
Wednesday 18 June 2025		
Opening Meeting – Merriwa RSL  ➤ Confirm scope of the audit, outline the audit process, methodology, timing, access, and resources required.	8:00 AM – 8:30 AM	All
Travel from Merriwa to Site	8:30 AM – 9:15 AM	All
<ul> <li>Site Inspection</li> <li>Undertake site induction/sign on as required.</li> <li>Witness current construction activities and provide focus for the review of environmental aspects, impacts and controls.</li> </ul>	9:15 AM – 10:15 AM	All
Travel from Site to Merriwa	10:15 AM – 11:00 AM	All



ltem	Time	Required Personnel
Review of Consent Conditions SSI-33964533		
<ul> <li>Part A: Administrative Conditions</li> <li>Part B: Environmental Conditions - General</li> </ul>	11:00 AM – 12:30 PM	Lightsource bp
Lunch Break	12:30 PM – 1:00 PM	All
<ul> <li>Part B: Environmental Conditions – General (cont.)</li> <li>Part C: Environmental Management, Reporting and Auditing</li> </ul>	1:00 PM – 2:30 PM	Lightsource bp DTI
Auditor consolidation (auditor only) / Afternoon tea break	2:30 PM – 3:00 PM	APP
Closing meeting  ➤ Outcome of audit and presentation of findings.  Deliverables as noted below.	3:00 PM – 3:30 PM	All

# Deliverables

Audit Deliverables	Responsibility
<ul> <li>Draft Report Submission</li> <li>▶ 15 days following conduct of independent audit</li> <li>▶ Invoice for works undertaken issued with draft report</li> </ul>	APP
Response to draft report  ➤ 7 days following receipt of draft audit report from APP	Lightsource bp & DTI
Final report submission  ➤ Finalised within 7 days following receipt of comments from Lightsource bp & DTI  ➤ Submitted to Lightsource bp upon payment of invoice	APP
Response to findings and submission of final audit report  Final audit report submitted to DPHI within 60 days	Lightsource bp



Audit Deliverables	Responsibility
Non-Compliances (if applicable)  ➤ Lightsourcebp is to follow the process to notify DPHI within 7 days regarding any non-compliances raised during the audit. Refer to conditions C12 & C13 of SSI-33964533 for details.	Lightsource bp

#### Limitations

- The audit will cover the construction requirements and will therefore be limited to auditing the applicable conditions of Schedules 2, Parts A, B, C and Appendices in accordance with Development Consent Conditions SSI-33964533.
- B. The audit will cover a sampling of records relevant to the scope. APP auditors will apply their professional judgment based on the information made available during the audit.
- C. APP will conduct the audit in accordance with the Independent Auditing Post Approval Requirements (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.

# Appendix B – Audit Attendance Sheet





# **Audit Attendance Sheet**

Project	Goulburn F	River Solar Farm	Audit No.	
Auditee	Michelle Ho	ousego	Lead Auditor	Grant Brown
Location		Goulburn River site		
Opening M	leeting Date	18/06/25		
Closing Me	eeting Date	18/06/25		

Name	Organisation	Position	Signature
Rachael Hannah Michelle Housego Rachel soh Brende Toely GRANT BROOM	LSOP LSOP PTI DTI APP	Environmental. HSE Advisor Enviro Advisor ENV. MANAGEN AUDITOR	Mys Shalls



#### **Details of attendees via Teams:**

Opening Meeting 7:58am - 8:12am				
Name	Company	Position		
Glenn Tilley	LSbp	Senior Project Manager		
Beth Kramer	LSbp	Principal Environmental Planner		
Jeffrey Brown (External)	DTI	Project Manager		
Luke Keerie (External)	DTI	Quality Manager		
Simon Sweeney (External)	DTI	Electrical Superintendent		
Andrew Peacock (External)	DTI	Senior Project Manager		
Vincent Malacria (External)	DTI	Mechanical Superintend		
Closing Meeting 2:58pm - 3:12p	om	1		
Name	Company	Position		
Glenn Tilley	LSbp	Senior Project Manager		
Beth Kramer	LSbp	Principal Environmental Planner		
Jeffrey Brown (External)	DTI	Project Manager		
Amy Williams	DTI	NSW Environmental Manager (in person)		
Linkon Knott	DTI	Logistics Manager (in person)		

# Appendix C – Approval of Auditors

#### Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-33964533-PA-18

Ellie Andrivon

LIGHTSOURCE DEVELOPMENT SERVICES AUSTRALIA PTY LTD

Level 29 420 George Street Sydney New South Wales 2000 15/04/2025

Sent via the Major Projects Portal only

Subject: Goulburn River Solar Farm (SSD 33964533) - Proposed IEA team Dear Ms

Andrivon

Reference is made to your post approval matter, SSD-33964533-PA-18, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Goulburn River Solar Farm, submitted as required by Schedule 2, Condition C15 of SSD-33964533 (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 7 April 2025.

In accordance with Schedule 2, Condition C15 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr Grant Brown, Lead Auditor
- Mr Sana Qasim, Auditor Assistant

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please note, the Lead Auditor must attend the site inspection/s. The end of the audit period shall coincide with the date of the site inspection.

Should you wish to discuss the matter further, please contact Ann Hagerthy, (Senior Compliance Officer) on 02 6575 3407 or email <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a>

# Department of Planning, Housing and Infrastructure



Yours sincerely

Joel Fleming

A/ Team Leader Compliance - Northern Region Compliance

As nominee of the Planning Secretary

# Appendix D – Independent Audit Declaration



# Declaration of Independence Form

Independent Audi	Independent Audit Declaration Form		
Project Name:	Goulburn River Solar Farm		
Consent Number:	SSD-33964533		
Description of Project:	Construction of a 585 MWp solar farm and battery energy storage system (BESS) to shift renewable energy to night-time peaks and support the reliable operation of Australia's grid. The project will also include operation and maintenance buildings, a temporary onsite workers accommodation camp, and electrical infrastructure required to connect to the existing electricity network.		
Project Address:	Wollara Road, Merriwa, NSW, 2329		
Proponent:	Lightsource bp		
Title of Audit:	Independent Environmental Audit		
Date:	09 July 2025		

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- 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 Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the 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 the Auditor:	Grant Brown
Signature:	90~.
Qualification:	Lead Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

# Appendix E – Audit Checklist



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating			
SCF	CHEDULE 2, PART A ADMINISTRATIVE CONDITIONS							
NE1	WORK C	ONNECTION WORKS						
1.	A1	Prior to commencing construction of the development, the Applicant must submit evidence to the satisfaction of the Planning Secretary that development for the augmentation of the existing transmission line and any associated works required to connect the solar farm to the electricity network:  (a) has been granted development consent under Part 4 of the EP&A Act; or  (b) if the development is an activity within the meaning of section 5.1 of the EP&A Act, a determining authority has assessed and determined to carry out, or approved the carrying out of, the activity in accordance with Part 5, Division 5.1 of the EP&A Act.	A Letter from Lightsource bp to DPHI, dated 6 March 2025, submitting the evidence that Transgrid has been assessed and approved for the carrying out of augmentation work to the existing transmission line in accordance with A1(b).  A SER Decision Statement "Transmission Line 54A – Optical Ground Wire Installation" was issued by Transgrid on 14 November 2024, confirming that the project is approved to proceed.  A letter from DPHI (Ref. SSD-339645333-PA-10), dated 10 March 2025, confirms that the requirements of Condition A1(b) have been satisfied, subject to compliance with the terms and conditions of the NSW National Parks and Wildlife Service and the implementation of the mitigation measures outlined in the Environmental Report prepared by GHD.		Compliant			
OBL	IGATION	TO MINIMISE HARM TO THE ENVIRONMENT						
2.	A2	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, commissioning, operation, upgrading, rehabilitation or decommissioning of the development.	The site inspection undertaken as part of this audit confirms that this condition is met. Environmental controls and management processes are in place on site and regularly assessed by the Contractor and Proponent.  Refer to site Inspection and photos within the audit report.		Compliant			



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
TER	RMS OF C	ONSENT			
3.	A3	The development may only be carried out:  (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 1.	The development is carried out:  (a) Self-reported non-compliance with Condition B17  (b) Written direction from DPHI regarding early access request to the site as per condition B7 specifying requirements pursuant to this approval (as evidenced in DPHI letter 10 <sup>th</sup> October 2024).  (c) Generally in accordance with EIS  (d) Generally in accordance with the development layout in appendix 1.	GRSF-01_NC-01:  A self-reported non-compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours (notified on 10 June 2025 to DPHI, ref. SSD-33964533-PA-24).  A non-compliance is therefore triggered against A3.  It is recommended that approval from the Department be obtained prior to undertaking any works outside of standard construction hours.	Non-Compliant
4.	A4	The Applicant must comply with any requirement/s of the Planning 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.	Lightsource bp have complied with requests for information relating to the Departments review of strategies, plans and correspondence with respect to the consent.  Sighted various requests for information from DPHI and responses from the applicant.		Compliant
5.	A5	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A3(c) or A3(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A3(c) or A3(d), the most	Noted		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		recent document prevails to the extent of the inconsistency, ambiguity or conflict.			
BAT	TERY ST	ORAGE RESTRICTION			
6.	A6	Unless the Planning Secretary agrees otherwise, the centralised battery storage associated with the development must not exceed a total energy storage capacity of 900MWh.			Not Triggered
7.	A7	Unless the Planning Secretary agrees otherwise, a single decentralised battery storage system location must:  (a) not exceed 30 MWh of energy storage in collocated batteries; and  (b) be separated by 25 metres from another decentralised battery storage system location.  The total energy storage stored in all decentralised battery storage system location must not exceed 1,160 MWh.  Note: Conditions A6 and A7 may be undertaken simultaneously. 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 in the future.			Not Triggered
UPG	RADING	OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE			
8.	A8	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 Planning Secretary incorporating the proposed upgrades.			Not triggered
9.	A9	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 National Construction Code.  Notes:			Not triggered



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		<ul> <li>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the development.</li> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>			
DEN	OLITION				
10.	A10	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Demolition of farmhouse was completed from 3 <sup>rd</sup> – 5 <sup>th</sup> June 2025. The demolition work was carried out by Hunter Valley Group.  SWMS for the demolition of farmhouse by Hunter Valley Group, dated 20 May 2025, was provided. The SWMS was reviewed and approved by DT Infrastructure on 27 May 2025 and reference the latest legislation and codes.  Complying Development Certificate application for demolition of dwellings and outbuildings, dated 22 May 2025, was provided.  Asbestos Clearance Certificate No. 249457 provided on 30 <sup>th</sup> May 2025 by Jarrad Cooper, Asbestos Assessor.		Compliant
PRO	TECTIO	N OF PUBLIC INFRASTRUCTURE			
11.	A11	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.			Not Triggered



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		<b>Note:</b> This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.			
OPE	RATION	OF PLANT AND EQUIPMENT			
12.	A12	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.	Provided with the GRSF Equipment Tracker, and sighted the following vehicle/plant maintenance records:  • AOE101, Caterpillar D8T dozer (500hr service, 17/12/24)  • AOE102, Caterpillar D10T dozer (30,000hr service, 09/04/25)  • AOE305, Dynapac CA5000PD (3,500hr service)  • AOE703, Mitsubishi Fuso FEC81CR (172,095hr service)		Compliant
APP	LICABIL	LITY OF GUIDELINES			
13.	A13	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.  However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
CON	MPLIANC	E			
14.	A14	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	GRSF induction presentation provided. The induction references the environmental consent and compliance management.  Copies of the following toolbox talks covering environmental aspects were provided:  Fauna strike procedures, 25/06/25  Construction Hours (no date)  End-of-day environmental controls, 24/06/25  No-Go Zones, 28/04/25  Spill Response (no date)  Spoil Movement and Placement 14/05/25		Compliant
EVIC	DENCE C	OF CONSULTATION			
15.	A15	Where conditions of this consent require consultation with an identified party, the Applicant must:  (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and  (b) provide details of the consultation undertaken including:  (i) the outcome of that consultation, matters resolved and unresolved; and  (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Consultation as linked to Conditions is referenced in each Management Plan:  B8 – Road Maintenance – consultation required with relevant Councils and TfNSW in Appendix H.  B10 – Traffic Management Plan – consultation required with TfNSW, Upper Hunter Shire Council, Mid-Western Regional Council in Appendix H.  B16 – Biodiversity Management Plan – consultation required with BCS in Appendix 1.  B26 – Heritage Management Plan – consultation required with local aboriginal stakeholders in Appendix 1.		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
COM	IMUNITY	ENHANCEMENT	B30 – Consultation required with DPE water – letter from DPE Water dated 16/04/25  B39 – Accommodation Camp Management Plan - consultation required with Council. UHSC confirmed consultation and final review of plan on 29/04/25.  B40 – Accommodation and Employment Strategy – consultation required with Council, Section 3.		
16.	A16	Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:  (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the draft agreement between the Applicant and Council, as referenced in Council's correspondence dated 16 May 2024, which are summarised in Appendix 3.	Voluntary Planning Agreement dated 20 <sup>th</sup> December 2024.  Letter to Upper Hunter Shire Council dated 3/6/2025 proposing 14 <sup>th</sup> April 2025 as the date for commencement of construction under clause 5.1(a) of the Goulburn River Solar Farm Voluntary Planning Agreement.		Compliant



D Re	eq. o.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
SCHEDUI	JLE 2,	PART B ENVIRONMENTAL CONDITIONS - GENERAL			
RANSPO	ORT				
7. B1	1	Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions  The Applicant must ensure that the:  (a) development does not generate more than:         (i) 55 heavy vehicle movements a day (a maximum of 15 heavy vehicle movements per hour) during construction, upgrading or decommissioning;  (ii) 24 movements of heavy vehicle requiring escort during construction, upgrading and decommissioning; and  (b) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 19 metres,  unless the Planning Secretary agrees otherwise.	Heavy vehicle monitoring is included under section 2.3 of EPC Project Monthly Report.  Heavy vehicle movement monitoring data for the Road Upgrade works from January to April 2025 was presented, confirming that heavy vehicle movements did not exceed the limit of 55 movements per day. The maximum recorded was 11 heavy vehicle movements on 22 January 2025.  Heavy and Light vehicle movement monitoring data for the early construction works from April 2025 was presented, confirming that heavy vehicle movement did not exceed the limit of 10 movements per day and light vehicle movement didn't exceed the limit of 20 movements per day. The maximum recorded was 10 heavy vehicle movements on 24 & 30 April 2025 and 19 light vehicle movements on 24 April.  LV & HV Movements Monthly Register provided depicting all traffic movements up to and including 30/06/2025.  Security log of vehicles in & out (sign on sheet) was sighted at arrival to site on the day of site inspection.		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
18.	B2	The Applicant must keep accurate records of the number of heavy vehicles and vehicles requiring escort entering or leaving the site each day for the duration of the project.	As above.		Compliant
19.	В3	Access Route  Unless otherwise agreed by the Planning Secretary, all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4.	Traffic Management Plan section 3.5.2 "Oversize / Overmass Vehicle Routes" outlines the heavy vehicles route to and from site via the Golden Highway / Ringwood intersection.		Compliant
20.	B4	All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection:  (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4; and  (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Traffic Management Plan section 3.5  "Construction Vehicle Routes" outlines the route including the Golden Highway and Ringwood Road.  Vehicle Movement Plan is included under appendix G.		Compliant
21.	B5	All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4.	Traffic Management Plan section 3.5 "Construction Vehicle Routes" outlines the turnaround facility on Barnett Street approximately 190m north of Golden Highway.  The turnaround facility 190m North of Golden Highway (approx. 4km west of Golden Highway / Ringwood Rd. intersection) is in place and used by all project vehicles travelling east on the Golden Highway. This was sighted by the auditor after leaving the site.		Compliant
22.	B6	Site Access  All vehicles associated with the development must enter and exit the site via the Primary Access point off Wollara Road, as identified in Appendix 1.  Note: Other site access points may be used for emergency purposes.	Traffic Management Plan section 3.5  "Construction Vehicle Routes" outlines the primary access point off Wollara Road.  Site inspection confirmed that the primary site access is off Wollara Road as per Appendix 1 of the consent. Two secondary access points of		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Wollara Road are designated emergency access only.		
23.	B7	Road Upgrades  Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 4.  Unless the relevant roads authority agrees otherwise, these upgrades must comply with the current Austroads Guidelines, Australian Standards (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.	The following approvals from DPHI were noted regarding the road upgrades:  • Lightsource bp letter to DPHI, dated 8 October 2024, requesting approval for revised timing of the road upgrade works.  • DPHI response to Lightsource bp, dated 10 October 2025, confirming approval of the revised timing for the road upgrades.  • Lightsource bp letter to DPHI, dated 28 March 2025, requesting early access to the site for limited commencement of construction works prior to the completion of road upgrades.  • DPHI response to Lightsource bp, dated 12 April 2025, granting approval for early site access to undertake limited construction works, subject to a restriction on daily traffic volumes to a maximum of 10 heavy vehicles and 20 light vehicles.  Additionally, TfNSW Notice of Practical Completion – WAD Merriwa BAR HW27 Golden HWY WST24/00054 28 May 2025 for the highway intersection upgrade and Barnett St was provided to GRSF		Compliant
24.	B8	Road Maintenance  The Applicant must, in consultation with the relevant roads authority:	(a) Road Dilapidation Survey for Goulburn River Solar Farm, version 1, ref. AUS- GRSF-DTI-ENG-CIV-REP-0001, dated		Compliant



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		<ul> <li>(a) undertake an independent dilapidation survey and report to assess the:         <ul> <li>(i) existing condition of Ringwood Road and Wollara Road on the transport route, prior to construction, upgrading or decommissioning works; and</li> <li>(ii) condition of Ringwood Road and Wollara Road on the transport route, following construction, upgrading or decommissioning works;</li> </ul> </li> <li>(b) on completion of the dilapidation reports undertaken in B8(a)(i) and (ii) provide a copy to the relevant road authority;</li> <li>(c) repair the roads identified in condition B8(a) if dilapidation surveys identify that the road has been damaged due to development-related traffic during construction, upgrading or decommissioning works;</li> <li>If there is a dispute between the Applicant and the relevant roads authority about road repairs (including timeframes) required under this condition, then either party may refer the matter to the Planning Secretary for resolution.</li> </ul>	13 January 2025, was reviewed. The survey was taken for Council Road "Ringwood Road & Wollara Road" and TfNSW Road "West Side of Barnett Street & East Side of Barnett Street". Section 6 of the survey "Conclusion" outlines the current condition of the roads.  (b) The Dilapidation Survey was submitted to the Upper Hunter Shire Council on 23/06/25  (c) Not triggered  There have been no disputes with relevant road authority for road repairs.		
25.	B9	Operating Conditions  The Applicant must ensure:  (a) the internal roads are constructed as all-weather roads; (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) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.			Not Triggered
26.	B10	Traffic Management Plan  Prior to commencing road upgrades identified in condition B7, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW, Upper Hunter Shire Council	Traffic Management Plan Rev. 3 doc no. TEJ0416-RPT-0001 prepared by Turnbull Engineering, dated 18 December 2024. The Plan was prepared in consultation with TfNSW, Upper Hunter Shire Council and Mid-Western Regional	Although the TMP is currently being revised to include DPHI comments, the revised TMP is not required to be approved	Compliant



ID Req.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
	and Mid-Western Regional Council, and to the satisfaction of the Planning Secretary. This plan must include:  (a) details of the transport route to be used for all development related traffic; (b) details of the road upgrade works required by condition B7; (c) a reconciliation table to demonstrate all traffic-related management measures and recommendations identified in the EIS have been included in the plan; (d) monitor the compliance of vehicles using the access route described in conditions B3, B4 and B5; (e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:  (i) details of the dilapidation surveys required by condition B8 of this consent; (ii) temporary traffic controls, including detours and signage, in particular regarding the left in / left out arrangement at the Ringwood Road / Golden Highway intersection, and the turnaround point on Barnett Street; (iii) monitoring the bi-directional traffic volumes on the Golden Highway at the Ringwood Road intersection; (iv) limiting construction traffic associated with the development to ensure that vehicle movements along the Golden Highway do not exceed 380 vehicles per hour during the AM network peak hour; (v) scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable; (vi) notifying the local community about development-related traffic impacts; (vii) procedures for receiving and addressing complaints from the community about development-related traffic impacts with other projects in the area during construction, upgrading or decommissioning works;	Council. The consultation details are included under appendix H "Stakeholder Consultation".  The TMP was conditionally approved by DPHI on 19 December 2024 ref. SSD-33459633-PA-2. The Department requested to resubmit the TMP for approval and include any changes to staging of management plans (where relevant) and project specific traffic management system for managing heavy vehicles requiring escort.  DPHI letter states that "The revised Traffic Management Plan must be updated and approved by the Planning Secretary:  • prior to the movement of any heavy vehicles requiring escort;  • prior to commencing construction (excluding road upgrades as detailed in the consent), upgrading or decommissioning;  • following approval of any staging request;  • following any additional consultation with TfNSW, Upper Hunter Shire Council and Mid-Western Regional Council; or  • as required in accordance with the consent."  Compliance with this condition demonstrated below:  (a) details of routes included under section 3.3 and appendix G	until culvert works on Ringwood Road is completed (approx. August 2025).	



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		(ix) minimising dirt tracked onto the public road network from development-related traffic;  (x) details of any employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;  (xi) measures for managing light vehicle peak numbers, including car-pooling or ride sharing by employees;  (xii) scheduling of haulage vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles;  (xiii) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;  (xiv) measures to minimise dust generated by construction traffic;  (xv) responding to any emergency repair or maintenance requirements; and  (xvi) a traffic management system for managing heavy vehicles requiring escort;  (f) a driver's code of conduct that addresses:  (i) driver fatigue;  (ii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and (iii) procedures to ensure that drivers implement safe driving practices; and  (g) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.  Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.	<ul> <li>(b) details of road upgrades included under section 3.1; section 3.5; appendix A; Appendix B.</li> <li>(c) Traffic-related management measures and recommendations included under section 5</li> <li>(d) Monitoring of compliance of vehicles included under section 5.6</li> <li>(e) Implementation of measures to minimise traffic impacts as follows: <ul> <li>(i) As per section 5.7.1</li> <li>"Dilapidation Surveys".</li> <li>(ii) As per section 3.1 "Early Works – Pre-construction; section 5.3 "Traffic Guidance Schemes"; section 5.6</li> <li>"Management of Construction Vehicle Routes".</li> <li>(iii) As per section 3.6.5</li> <li>"Monitoring of Construction Traffic Volumes"</li> <li>(iv) As per section 3.6.5</li> <li>"Monitoring of Construction Traffic Volumes"</li> <li>(v) As per section 3.6.3</li> <li>"Construction Traffic"</li> <li>(vi) As per section 6.1</li> <li>"Stakeholders"</li> <li>(vii) As per section 6.2 "Complaints Management"</li> <li>(viii) As per section Impacts"</li> </ul> </li> </ul>		



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(ix) As per section 5.7.2 "Tracking Dirt onto Public Roads"  (x) As per section 3.6.4 "Employee Shuttle Bus Services"  (xi) As per section 3.6.3 "Construction Traffic"  (xii) As per section 3.5.2 "Oversize / Overmass Vehicle Routes"; section 5.5 "Driver Code of Conduct"  (xiii) As per section 5.5 "Driver Code of Conduct"  (xiii) As per section 5.5 "Driver Code of Conduct"  (xiv) As per section 5.7.5 "Air Quality"; Appendix F "Driver Code of Conduct"  (xv) As per section 5.7.4 "Emergency Road Repair"  (xvi) As per section 5.9 "OSOM Vehicles"  (f) Driver code of conduct is included under appendix F and addresses the following:  (i) Section 3 "Driver Fatigue"  (ii) Section 4 "Designated Transport Routes"  (iii) Section 2 "Driving to and from the Project"  (g) Section 5.5 "Driver Code of Conduct" outlines that the driver receives the suitable training.		



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27.	B11	Unless the Planning Secretary agrees otherwise, the Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations adjacent Wollara Road identified in Appendix 5, which must:  (a) be planted prior to commencing operation; (b) be comprised of species that are endemic to the area; (c) be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and (d) be properly maintained with appropriate weed management; unless the Planning Secretary agrees otherwise			Not Triggered
28.	B12	Unless the Planning Secretary agrees otherwise, the Applicant must maintain the agricultural land capability of the site, including:  (a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; (b) maintain ground cover at a minimum of 70% to prevent soil erosion; and (c) properly maintaining the ground cover with appropriate perennial species and weed management.			Not Triggered
29.	B13	Vegetation Clearance The Applicant must not clear any native vegetation or fauna habitat located outside the approved development footprint described in the EIS.	Biodiversity Management Plan section 6.3 "Vegetation Clearance Procedures" specifies the total amount of vegetation clearance that is permitted by the Project. It also states that exclusion fencing, and signage will be used to protect vegetation and fauna habitat located outside of the approved disturbance areas.		Compliant



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			Seven pre-clearance survey reports by AEP for Main Site and access roads between 13/01/25 – 06/06/25 provided as evidence to satisfy the requirements of Section 6.3.4 of the Biodiversity Management Plan.  Weeds, such as prickly pear, are manually removed, stockpiled separately and covered with black plastic to destroy plants and prevent seeds from spreading.  Drones are used for mapping of vegetation.  Slashing of grass does not usually require inspection by an ecologist, however each scenario is risk-assessed beforehand. Should the risk assessment determine an unsatisfactory ecological risk, an ecologist will inspect.		
	B14	Biodiversity Offsets  Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:  (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.  Table 1: Ecosystem Credit Requirements  Vegetation Community PCT Credits Timing	The following Biodiversity Credit Reports were provided:  1. Road Upgrade – Kerrabee IBRA Subregion, 07/01/2024, Assessment ID 00032861/BAAS17099/23/00044406  2. Goulburn River Solar Farm – Ringwood Road Upgrade Works, 07/01/2024, Assessment ID 00032861/BAAS17099/23/00040004  3. Goulburn River Solar Farm, 07/01/2024, Assessment ID 00032861/BAAS17099/22/00032862  Payment confirmation statement BCF793 dated 27 November 2024 from the NSW Biodiversity Conservation Trust was provided.		Compliant



o lo	Req. No.	SSD 33964533 Requirer	ment			Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		Solar Farm Site Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley Narrow-leaved Ironbark - Black Pine - Sifton Bush heathy open forest on sandstone ranges of the upper Hunter and Sydney Basin  Road Upgrades Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter	483 483 483 1691	4,618 59	Prior to commencing construction  Prior to commencing road upgrade works	Additionally, Credit Retirement Reports 00053932 (23/08/24) and 00055549 (22/08/24) were provided.  All records confirm that the biodiversity credits in Table 1 and 2 have been retired and payments made.	_	
		Western Hunter Flats Red Gum Sedge Forest Central West Valleys	3334	1 12				
		White Box Forest Ulan Sandstone Ironbark- Pine Woodland	3781	32				
		Table 2: Species Credit Rec Species Credit Species	quireme	ents Cred Requi				
		Solar Farm Site Regent Honeyeater (Antho	ochaera	ra   1,4	24 Prior to			



ID No	Req. No.	SSD 33964533 Requirement			Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		phrygia) Barking Owl (Ninox connivens)  Road Upgrades Commersonia rosea Pine Donkey Orchid (Diuris tricolor) Regent Honeyeater (Anthochaera phrygia) Large-eared Pied Bat (Chalinolobus dwyeri) Giant Burrowing Frog (Heleioporus australiacus) Pale-headed Snake (Hoplocephalus bitorquatus) Broad-headed Snake (Hoplocephalus bungaroides) Barking Owl (Ninox connivens) Common Planigale (Planigale maculate) Stripped Legless Lizard (Delma	6 14 2 9 85 25 3 64 13 3	commencing construction  Prior to commencing road upgrade works			Training
31.	B15	impar) Eastern Cave Bat (Vespadelus troughtoni) Prior to carrying out any development the impact the biodiversity values requiring provide evidence to the Planning Secretary bear retired.	14 nat could di	Applicant must	DPHI letter to Lightsource bp ref. SSD-33964533-PA-7, dated 19 December 2024, confirming the satisfaction with the offset package for road upgrades works.		Compliant
					DPHI letter to Lightsource bp ref. SSD-33964533-PA-15, dated 13 March 2025, confirming that the project meets the offset requirements in terms of vegetation types, species and credits for the Solar Farm site.		
32.	B16	Biodiversity Management Plan  Prior to carrying out any development the impact biodiversity values, the Applican Management Plan for the development the satisfaction of the Planning Secretary	t must prep in consultat	pare a Biodiversity tion with BCS, and to	Biodiversity Management Plan Rev. Final prepared by Umwelt Australia, dated 18 December 2024. The Plan was prepared in consultation with BCS. The details of consultation are included under appendix 1 "Agency		Compliant



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	(a) be prepared in accordance with the Biodiversity Development Assessment Reports dated 11 January 2024 and 18 January 2024 provided in the Amendment Report;  (b) include a description of the measures and timeframes that would be implemented for:  (i) protecting vegetation and fauna habitat outside the approved disturbance areas;  (ii) managing and enhancing the remnant vegetation and fauna habitat on site;  (iii) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;  (iv) minimising the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna;  (v) minimising the impacts to fauna on site and implementing fauna management protocols;  (vi) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions;  (vii) 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;  (viii) controlling weeds, feral pests and pathogens in consideration of the relevant Commonwealth threat abatement plans; and  (ix) minimising impacts on entities at risk of a serious and irreversible impact (SAII), including:  • securing an additional 23.5 hectares of Box Gum Woodland derived native grassland (DNG) within a Biodiversity Stewardship Agreement for the purposes of rehabilitating, enhancing and protecting, in perpetuity, this vegetation to a condition state commensurate with Box Gum Woodland;  • undertaking a research program regarding the impacts of the development on the vegetation	Consultation. The BMP and approval letter are both on the project website.  The DPHI approved the plan on 19 December 2024 ref. SSD-33964533-PA-4.  Compliance with this condition demonstrated below:  (a) Section 1.1 "Purpose of this Biodiversity Management"  (b) The plan includes a description of the measures and timeframes that would be implemented as follows:  (i) As per section 6.3.2 "Exclusion fencing and No-go Zone Procedure"  (ii) As per section 6.8 "Vegetation Management Zones"; section 6.9 "Rehabilitation and Restoration Procedure"  (iii) As per section 6.3.1 "Monitoring the Total Clearing Footprint for the Project"  (iv) As per section 6.3.6 "Tree Felling and Fauna Habitat Feature Removal Procedure"  (v) As per section 6.4 "Fauna Handling Procedure"  (vi) As per section 6.9 "Rehabilitation and Restoration Procedure"  (vii) As per section 6.9.2 "Salvage of Habitat Features and Vegetative Materials"		



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		integrity of the Box Gum Woodland DNG retained onsite; and  • providing \$25,000 per annum (over the first 5 years following commencement of construction) towards Regent Honeyeater conservation programs in consultation with the BCS;  (c) include a program to monitor and report on the effectiveness of mitigation measures;  (d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site;  (e) include details of who would be responsible for monitoring, reviewing and implementing the plan.  Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	(viii) As per section 6.6 "Weed and Pathogen Management Procedure"; section 6.7 "Pest Management Procedure"  (ix) As per section 6.3 "Vegetation Clearance Procedures"  • As per section 6.13.2 "Box Gum Woodland Restoration"  • As per section 6.12 "Vegetation Integrity Study"  • As per section 6.10 "Regent Honeyeater Conservation"  (c) As per section 8.0 "Monitoring and Reporting"  (d) As per section 6.5 "Unexpected Threatened Species Finds Protocol"  (e) As per section 7.0 "Roles and Responsibilities".		
AME	NITY				
33.	B17	Construction, Upgrading and Decommissioning Hours  Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:  (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays.	Construction hours are included in the project site induction, provided as evidence  Construction activities occurred outside the approved construction hours on Sunday, 25 May 2025, resulting in a non-compliance. The final demobilisation of the 5 Mile Rest Stop worksite was scheduled for 26 May 2025; however, due to forecasted rainfall and the associated risk of sediment runoff, the contractor removed the	GRSF-01_NC-01:  A self-reported non- compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours (notified on 10 June	Non-Compliant



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			material stockpile on Sunday, 25 May 2025, without obtaining prior approval. Three truck & dogs from the 5 mile rest area (Golden Hwy) moved VENM to Council Borrow Pit. Each truck undertook three trips each.  The non-compliance was notified to DPHI on 28 May 2025 on 10 June 2025 ref. SSD-33964533-PA-24. Follow up correspondence was sent to DPHI on 10 June 2025 with updated information.  On 13/06/2025, DPHI requested further information from the project, due by 23/06/2025. A response to DPHI was still being drafted at the time of the audit.	2025 to DPHI, ref. SSD-33964533-PA-24).  A non-compliance is therefore triggered against B17.  It is recommended that approval from the Department be obtained prior to undertaking any works outside of standard construction hours.	
34.	B18	Exceptions to Construction Hours  The following activities may be undertaken outside the hours specified in condition B17 above:  (a) commissioning activities that are inaudible at non-associated residences; (b) the delivery or dispatch of materials as requested by the NSW Police Force or other authorities for safety reasons; or (d) emergency work to avoid the loss of life, property and/or material harm to the environment.	Noted		Not Triggered
35.	B19	Variation of Construction Hours  The hours of construction activities specified in condition B17 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:  (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during	There is a request currently with DPHI to extend hours to Saturday afternoon and Sundays (with conditions). Both TfNSW and the Upper Hunter Shire Council have responded to consultation confirming no objection to the request. A response from DPHI was still pending at the time of the audit.		Compliant



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		the varied construction hours;  (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been and will be undertaken;  (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and  (e) accompanied by a noise impact assessment consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or latest version.	<ul> <li>Evidence provided:</li> <li>Request for extended hours under B17 from Lightsource bp (30/05/25)</li> <li>No objection email from TfNSW (21/05/25)</li> <li>No objection email from UHSC (25/05/25)</li> </ul>		
36.	B20	The Applicant must:  (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009) or its latest version; and ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq, 15min to be determined in accordance with the procedures in the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence.	<ul> <li>(a) The project is operating in accordance with best practice requirements outlined in the <i>Interim Construction Noise Guideline</i></li> <li>(b) Not triggered</li> </ul>		Compliant
37.	B21	Dust  The Applicant must minimise the dust generated by the development.	Dust suppression mitigation measures are included in Environmental Management Strategy under appendix 3 "Consolidated Mitigation and Management Measures".  • Where construction works generate dust, all reasonable and practicable measures are to be undertaken to prevent dust and street sweepers to be used to remove sediment from sealed roads		Compliant



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			<ul> <li>Areas are to be stripped progressively and only where it is necessary for works to occur</li> <li>Disturbed areas are to be stabilised as soon as practical.</li> <li>Disturbed areas are to be dampened with a light water spray as required.</li> <li>Vehicle movements are to be restricted to designated access roads.</li> <li>All loads are to be covered when transporting material where practical.</li> <li>Three water carts are used on site and were operational on site and Wallara Road upgrades.</li> <li>See photo in Appendix G</li> </ul>		
38.	B22	The Applicant must:  (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection;  (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.	Environmental Management Strategy section 4.1.2 "Visual Amenity" states that "Visual impacts will be managed in accordance with Condition B22 of the Development Consent, the EIS (Umwelt 2023) and the Landscape Character and Visual Impact Assessment (Envisage 2023)".  The mitigation measures for Visual id. EMS20 is included in the Environmental Management Strategy under Appendix 3 "Consolidated Mitigation and Management Measures".		Compliant
39.	B23	(a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; (iii) complies with the good lighting design principles	The mitigation measures for Social Amenity (lighting) id. EMS12 is included in Environmental Management Strategy under appendix 3 "Consolidated Mitigation and Management Measures".		Compliant



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		outlined in the Dark Sky Planning Guideline (2023); and (iv) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or the latest version.	<ul> <li>Where possible, Lightsource bp will aim to manage potential night lighting impacts by:         <ul> <li>Locating common areas within the internal zone of the TWA Facility to contain light spill.</li> <li>Selecting and designing lights to avoid excessive light spill onto surrounding areas.</li> <li>Encouraging the use of the TWA Facility shuttle</li> </ul> </li> <li>Lighting towers at the site compound on site are used for pre-start only at 6.30am (winter). Lighting is not used on site at any other time. Lighting tower luminance is minor and downward facing and complies with the Dark Sky Planning Guideline (2023) principles and AS4282.</li> </ul>		
HERI	TAGE				
40.	B24	Protection of Heritage Items  The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint.	Heritage Management Plan section 6 "Mitigation and Management" outlines the detailed management strategies to protect the heritage items located outside the approved development footprint.  There have been no impacts to heritage items noted to date.		Compliant
41.	B25	The Applicant must maintain a 20m exclusion zone around the area of 'high potential' for historical archaeological artefacts associated with the original slab hut as identified by the red shading on Figure 11 in Appendix 6.	Heritage Management Plan section 6.2.3.4  "Management of HS01" states that the permanent fence will be installed 20m exclusion zone around aboriginal heritage slab hut ruins (HS01) and managed in accordance with the		Compliant



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			recommendation set out in Aboriginal Cultural Heritage Assessment Report prepared by OzArk.		
			Heritage Management Plan Section 6.3  "Historical Heritage Management" outlines the management measures to protect the historical heritage values associated with HS01.  Slab Hut and heritage item 37-01-1027 are flagged off. Slab hut heritage site inspected during site inspection, and photo of 37-01-1027 provided.		
42.	B26	Heritage Management Plan  Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development and to the satisfaction of the Planning Secretary. This plan must:  (a) be prepared in consultation with local Aboriginal stakeholders, and reviewed by Heritage NSW; (b) include a description of the measures that would be implemented for:  (i) protecting the heritage items identified in Table 1 of Appendix 6, and items located outside the approved development footprint;  (ii) fencing / demarcation (as appropriate) of the identified heritage items prior to carrying out any development that could directly or indirectly impact the identified heritage items;  (iii) establishing the exclusion zone around the original slab hut as required under condition B25;  (iv) recording and salvage collection of the heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6;  (v) further recording and investigation of the grinding groove site 'Kiloe Creek GG1'	Heritage Management Plan Rev. Final prepared by OzArk, dated March 2025. The plan was approved by DPHI on 9 April 2025 ref. SSD-33964533-PA-5.  Compliance with this condition demonstrated below:  (a) The plan was prepared in consultation with local Aboriginal stakeholders and Heritage NSW. The consultation details are included under Section 5  "Consultation"; Appendix 1 "Government Stakeholder Consultation Records"; Appendix 2 "Aboriginal Stakeholder Consultation Records".  (b) The description of measures that would be implemented are addressed as follows;  (i) As per section 6.2.3.1 "Aboriginal sites that will not be harmed"; section 6.2.3.10 "Management of Community Interest Trees"; section		Compliant



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		(AHIMS site #37- 1-1033);  (vi) a contingency plan and reporting procedure if:  • heritage items outside the approved development footprint are damaged;  • previously unidentified heritage items are found; or  • skeletal material is discovered;  (vii) 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  (viii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and  (c) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.  Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.	6.4.5 "New Sites Outside the Development Footprint"  (ii) As per section 6.2.3 "Measures to protect known Aboriginal objects; section 6.3 "Historical Heritage Management"  (iii) As per section 6.2.3.3 "Additional investigation at 37-1-0053 (Poggy;Mt Misery;)  (iv) As per section 6.2.3.5 "Management of 37-1-1027); section 6.2.3.7 "Community Interest Trees that will be Harmed"  (v) As per section 6.2.3.2 "Additional Investigation at 37-1-1033 (Killoe Creek GG1)  (vi) As per section 6.3.2 "Identification of Previously Unknown Historical Heritage Sites"; section 6.4.1 "Unanticipated heritage finds procedures, section 6.4.2 'Identification of Previously Unknown Historical Heritage Sites"; section 10 "Incident Reporting"  (vii) As per section 7.2 "Cultural Heritage Awareness Training"  (viii) As per section 5 "Consultation"; appendix 2 "Aboriginal Stakeholders Consultation Records"  (c) Monitoring and Reporting procedures and details are included under section 7 "Monitoring and Reporting".		



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SOIL	AND W	ATER			
43.	B27	Water Supply  The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.  Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.	Soil and Water Management Plan section 4.1.1.1 "Construction" outlines the water supply arrangements during construction phase. It also states that "non-potable water will primarily be used for plant establishment, dust suppression and site ablutions".  Section 4.1.1.3 "Water Sourcing Strategy" outlines the strategy for sourcing potable and non-potable water.  No water licences have been obtained by the project to date. The project plans to access four GW bores, at which time licences will be obtained for these and the SWMP will be updated to include these agreements.		Complaint
44.	B28	Water Pollution  The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	No water pollution events have occurred on site.		Compliant
45.	B29	Operating Conditions  The Applicant must:  (a) minimise any soil erosion and control sediment generation; (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), or their latest versions; (c) ensure the solar panels and ancillary infrastructure are	Soil and Water Management Plan addresses the following requirements:  (a) The details of erosion and sediment control design and controls are included under section 6 and section 7. ESCP 20250606_PESCP_Haul Road Area 1&2 was sighted during the site inspection. Additionally, the PESCP Temporary Workers Accommodation is being updated to include the re-direction of the western RFD outlet t north to		Compliant



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		designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site;  (d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site;  (e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site;  (f) ensure all works within waterfront land is undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (DPE, 2022), unless the Planning Secretary agrees otherwise; and  (g) ensure the design of all creek crossings (including internal tracks and MV cables) is in accordance with the document Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries 2003) and the Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013).	sediment basin and include batter treatments detail.  (b) The details of erosion and sediment control design and controls are included under section 6 and section 7. A CPESC undertakes monthly site inspections to confirm compliance.  (c) Surface water management measures and controls details are outlined in section 4 and section 7.  (d) Surface water management measures and controls details are outlined in section 4 and section 7.  (e) Surface water management measures and controls details are outlined in section 4 and section 7.  (f) The work in waters and on waterfront land management controls are outlined in section 7.8, however not triggered to date.  (g) Stormwater Management and Access Track Management controls are outlined section 4.2 and section 7.4, however not triggered to date.		
46.	B30	Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPE Water. This plan must:  (a) be prepared by suitably qualified and experienced persons; (b) include a description of the measures that would be implemented to ensure that the objectives of condition B29 (a) – (g) above are achieved; (c) include a program to monitor and report on the effectiveness	Soil and Water Management Plan Rev. 3 prepared by Umwelt Australia, dated 13 February 2025.  Evidence of consultation with DPE Water includes:  • Request to NSW DCCEEW for consultation on the Soil & Water management Plan (14/02/25)		Compliant



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		of these measures; and (d) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.  The Applicant must implement the Soil and Water Management Plan.	<ul> <li>Response from NSW DCCEEW         (11/03/25) with two recommendations</li> <li>Confirmation from Lightsource bp         (01/04/25) that NSW DCCEEW         recommendations are included in the         SWMP.</li> <li>Compliance with this condition demonstrated below:         <ul> <li>(a) Section 1.1 states that "This SWMP has                 been prepared by Melissa Swan,                 Principal Environmental Engineer,                 Umwelt. Melissa Swan is a Certified                Professional in Erosion and Sediment                 Control (CPESC #8954)".</li> <li>(b) Objectives of condition B29 (a) to (g) are                 addressed in section 5, section 6 and                 section 7.</li> <li>(c) As per section 10 "Inspection,                  Maintenance and Monitoring".</li> <li>(d) As per section 10.1 "Site Monitoring"                       and 10.3 "Water Quality Monitoring".</li> </ul> </li> </ul>		
HAZA	ARDS				
47.	B31	Prior to commencing construction of the battery storage facility (except for construction of those preliminary works that are outside the scope of the hazard studies), the Applicant must prepare and submit a Fire Safety Study for the battery storage, to the satisfaction of the Planning Secretary and that meets the requirements of FRNSW. The study must:  (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study'	This condition will be triggered prior to BESS construction.		Not Triggered



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		<ul> <li>(b) be prepared in accordance with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium- ion battery energy storage systems – Fire safety study considerations.</li> <li>(c) describe the final design of the battery storage;</li> <li>(d) include reasonable worst-case fire scenario to and from the battery storage and the associated fire management; and</li> <li>(e) identify measures to eliminate the expansion of any fire incident including:</li> <li>(i) adequate fire safety systems and appropriate water supply;</li> <li>(ii) separation and / or compartmentalisation of battery units; and</li> <li>(iii) strategies and incident control measures specific to the battery storage design.</li> <li>Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study.</li> <li>Note: 'meets the requirements of FRNSW' above means confirmation in writing from FRNSW that the Study meets the requirements of FRNSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</li> </ul>			
48.	B32	Storage and Handling of Dangerous Goods  The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Diesel is stored on site in self-bunded tanks and separated from other flammable liquids. It is therefore not considered to be potentially hazardous as per Appendix 4 of the Hazardous and Offensive Development Application Guidelines.		Not Triggered
49.	B33	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:  (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids:  Environmental Protection – Participants Handbook if the chemicals are liquids.	Dangerous goods are stored correctly on site with correct segregation and security, as sighted during the site inspection.  A copy of the Hydrocarbon Container Register and the SDS Register were provided.		Compliant



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		In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.			
50.	B34	For the solar and battery storage components of the development, the Applicant must:  (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development: (i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; and (ii) is suitably equipped to respond to any fires on site, including provision of a 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection; (iii) includes a 10 metre defendable space around the perimeter that permits unobstructed vehicle access, and assists the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (iv) is managed as an asset protection zone (including the defendable space); (c) assist the RFS, FRNSW 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 committee following completion of construction of the			Not Triggered
51.	B35	development, and prior to commencing operations.  Emergency Plan  Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, including an evacuation plan for the accommodation camp, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must:	Emergency Plan (EP) Rev. 1 prepared by Riskcon Engineering, dated 10 March 2025. The EP was submitted to the NSW Rural Fire Service (RFS) via email on 12 March 2025. The RFS responded on 1 April 2025 confirming their	A baseline EP is now in place. This will be updated for bushfire emergency evacuation purposes for the Temporary Workers Camp.	Compliant



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	<ul> <li>(a) be updated in accordance with the findings of the Fire Safety Study required under Condition B31 of Schedule 2;</li> <li>(b) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);</li> <li>(c) be consistent with the NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan;</li> <li>(d) include details on how the battery storage and sub-systems can be safely isolated in an emergency;</li> <li>(e) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</li> <li>(f) include availability of fire suppression equipment, access and water;</li> <li>(g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</li> <li>(h) include fire and bushfire emergency management planning, including: <ol> <li>(i) details of the location, management and maintenance of the Asset Protection Zone;</li> <li>(ii) a list of works that must not be carried out during a total fire ban;</li> <li>(iii) details of how RFS would be notified, and procedures that would be implemented, in the event that:  <ol> <li>there is a fire on-site or in the vicinity of the site;</li> <li>there are any activities on site that would have the potential to ignite surrounding vegetation; or</li> <li>there are any proposed activities to be carried out during a bushfire danger period;</li> </ol> </li> <li>(i) detail specific response measures in the case of flood to ensure site safety;</li> <li>(j) describe the specific emergency exit routes to be used in</li> </ol></li></ul>	satisfaction with the plan. Copies of all correspondence was sighted by the auditor.  Compliance with condition B35 as follows:  (a) As per section 2.3.2.3 "BESS Facility" (b) As per section 1.1 "Purpose of Emergency Response Plan"  (c) As per section 1.1 "Purpose of Emergency Response Plan"  (d) As per section 2.3.2.3 "BESS Facility" (e) As per section 3.2.1 "Fire and Explosion Hazards and Management"  (f) As per section 3.2.1.4 "Fire and Emergency Management Measures"  (g) As per appendix A "Emergency Contact Numbers"  (h) Fire and bushfire emergency planning as follows:  (i) As per section 3.2.1.2 "Bushfire/Grass Fire"  (ii) As per section 3.2.1.3 "Construction Hotwork"  (iii) As per section 3.2.1 "Fire and Explosion Hazards and Management"  (i) As per section 3.2.4 "Natural Events" and appendix B "Emergency Services Information Package"  (k) As per appendix B "Emergency Services Information Package"  Additionally, the project will be installing a Pano Al powered Bushfire Detection and Situational		



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and  (k) include an Emergency Services Information Package in accordance with Emergency services information package and tactical fire plans (FRNSW, 2019), to the satisfaction of FRNSW and RFS.	Awareness system for early detection of bushfires. The system was sighted by the auditor on site awaiting installation.		
52.	B36	The Applicant must:  (a) implement the Emergency Plan and Emergency Services Information Package for the duration of the development; and  (b) following commencement of commissioning of the battery storage, keep two copies of the Emergency Plan and Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times.	Compliance with condition B36 as follows:  (a) Emergency Plan section 8 "Plan Implementation and Distribution"  (b) Not Triggered		Compliant
WAS	TE				
53.	B37	<ul> <li>(a) minimise the waste generated by the development;</li> <li>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</li> <li>(c) store and handle all waste on site in accordance with its classification;</li> <li>(d) not receive or dispose of any waste on site; and</li> <li>(e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal (including consultation with Council for use of Council facilities).</li> </ul>	As the project is in early stages of construction, waste generation is minor. As such, office waste is removed to the Merriwa site office and disposed of  At the time of audit, 8.38T of general and demolition waste has been disposed of to landfill, and 131.7T of demolition waste has been recycled.  All waste has been removed as per the Waste Classification Guidelines.  The site has not received or disposed of any waste on site.		Compliant



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			Two licensed waste contractors have serviced the site to date.  A copy of the Waste Register was provided.		
ACC	ОММОД	ATION CAMP			
54.	B38	For the accommodation camp components of the development, the Applicant must:  (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development:     (i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; (ii) internal roads and utilities are provided in accordance with the requirements of the bushfire assessment report produced by Umwelt (Australia) Pty Limited (dated May 2024); (iii) includes a defendable space around the perimeter being a minimum 20 metres on all sides, that permits unobstructed vehicle access; and (iv) is managed as an asset protection zone (including the defendable space); (c) assist the RFS, FRNSW 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 committee following completion of construction of the development, and prior to commencing operations.	Accommodation camp is still under construction		Not Triggered



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
55.	B39	Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. The plan must:  (a) ensure utilities at the accommodation camp, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards;  (b) ensure the accommodation camp complies with condition B38;  (c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction:  (i) complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) Guidelines for irrigation water quality;  (ii) meets the requirements of the Public Health Act 2010;  (d) include measures for dust suppression within the accommodation camp;  (e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and  (f) include measures to support local suppliers in servicing the camp where possible.  The Applicant must implement the Accommodation Camp Management Plan.	Camp Management Plan Rev. K prepared by DT Infrastructure, doc no. AUS-GRSF-DTI-PMT-PLN-0010, dated 16 May 2025. The plan was prepared in consultation with Upper Hunter Shire Council. The final response from Council was received on 11 June 2025 confirming that plan looks fine.  Compliance with condition B39 as follows:  (a) As per section 3.3 "Utilities"  (b) Section 8.1 refer to Emergency Plan – Emergency Plan complies with condition B38  (c) As per section 3.3 "Utilities"  (d) As per section 3.3 "Utilities"  (e) As per section 3 "Camp Layout and Facilities"  (f) As per section 6.1.1, the contractor has secured a long-term contract with DTI will secure a long-term contract with Merriwa Fuel Supplies (CRT) for the fuel supply contract for camp.		Compliant
56.	B40	Accommodation and Employment Strategy  Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council. This strategy must:  (a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development, generally consistent with the Accommodation and Employment Strategy dated May 2024;  (b) consider the cumulative impacts associated with other State	Accommodation and Employment Strategy Amended prepared by Umwelt, dated 23 May 2025. The Rev. Final was issued on 5 December 2025.  Details of consultation with local councils is within Section 3 of the plan. Consultation includes:  • UHSC 12/10/23 & 08/11/23 • Muswellbrook Shire Council 12/10/23		Compliant



ID No	Req. No.	SSD 33964	533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		(c) investi worke where (d) include the str monite The Applican Employment commenceme	cant projects in the area; gate options for prioritising the employment of local rs for the construction and operation of the development, feasible; and e a program to monitor and review the effectiveness of ategy over the life of the development, including regular oring and review during construction. t must provide a copy of the Accommodation and Strategy to the Planning Secretary prior to ent of construction and implement the plan throughout and operation of the accommodation camp.	Mid-Western Shire Council 19/10/23  Compliance with condition B40 as follows:  (a) As per section 4.4 "Accommodation Actions and Mitigation Strategies"  (b) As per section 2.6 "Cumulative Social Impacts"  (c) As per section 5.2.1 "Employment Profile and Opportunity Across the Social Locality"  (d) As per section 5.4 "Employment Actions and Mitigation Strategies" and section 6 "Conclusion".  The Accommodation and Employment Strategy was acknowledged by DPHI on 13/03/25 confirming that DPHI has no comments.		
DEC	OMMISS	IONING AND I	REHABILITATION			
57.	B41	Secretary agree the satisfaction comply with the	ths of the cessation of operations, unless the Planning ees otherwise, the Applicant must rehabilitate the site to n of the Planning Secretary. This rehabilitation must e objectives in Table 3.  abilitation Objectives  Objective  Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use	This condition will be triggered after the decommissioning of the project.		Not Triggered



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		Solar farm and ancillary infrastructure				
		Land use	Restore land capability to pre-existing use (Land Capability Class 4 to 6)			
		Community	Ensure public safety at all times.     Ensure long-term access through the site for NPWS.			



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating					
SCHED	HEDULE 2, PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING									
ENVIRO	ONMENTA	L MANAGEMENT								
58.	C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:  (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:  (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;  (ii) receive, handle, respond to, and record complaints;	<ul> <li>Environmental Management Strategy (Final) prepared by Umwelt, dated 19 December 2024. The Department conditionally approved the Strategy on 19 December 2024 ref. SSD-33964533-PA-6.</li> <li>The Department requested to submit a revised strategy that includes the following: <ul> <li>An Unexpected Finds Procedure no longer than 4 weeks from the completion of consultation with local Aboriginal stakeholders and Heritage NSW. Evidence of this consultation is to be provided to the Department.</li> <li>A detailed scope for all management plans and strategies for the staging of the project within 4 weeks of obtaining approval from the Planning Secretary.</li> </ul> </li> <li>The updated strategy is currently under revision and is yet to be completed and re-submitted.</li> <li>Compliance with condition C1 as follows: <ul> <li>(a) As per section 1.3 "Strategic Environmental Management Framework"</li> <li>(b) As per section 2 "Statutory Context"</li> <li>(c) As per section 4 "EMS Implementation"</li> <li>(d) Procedures that would be implemented are addressed as follows: <ul> <li>(i) As per section 6 "Communication"</li> <li>(ii) As per section 6.3.1 "Complaints Procedure"</li> </ul> </li> </ul></li></ul>		Compliant					



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
		(iii) resolve any disputes that may arise;  (iv) respond to any non-compliance;  (v) respond to emergencies; and  (e) include:  (i) references to any strategies, plans and programs approved under the conditions of this consent; and  (ii) a clear plan depicting all the monitoring to be carried out in relation to the development.  Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	(iii) As per section 6.3.1.1 "Dispute Resolution"  (iv) As per section 10.1.2 "Non-Compliance Notification  (v) Section 12 "References" refers to Emergency Plan.  (e) Include:  (i) As per section 1.3.3  (ii) As per section 7.2		
59.	C2	Revision of Strategies, Plans and Programs  The Applicant must:  (a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and (b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: (i) submission of an incident report under condition C11 of Schedule 2; (ii) submission of an audit report under condition C15 of Schedule 2; or (iii) any modification to the conditions of this	(a) No upgrades required to date (b) No reviews required to date		Not Triggered



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
60.	C3	Updating and Staging of Strategies, Plans or Programs  With the approval of the Planning Secretary, the development may be staged and the Applicant may:  (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and  (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	<ul> <li>A Staging Request was submitted to the Department on 6/06/25 and receipt acknowledged on the same date.</li> <li>Details of the staging request include: <ul> <li>Stage 1: Road upgrades and associated culvert works.</li> <li>Stage 2 (a): Site preparation and construction of the TWA.</li> <li>Stage 2 (b): Construction and commissioning of the 585MWp solar farm, including the solar array, substation, and all ancillary infrastructure.</li> <li>Stage 2 (c): Construction of 580MWp/1160MWh decentralised battery energy storage system (BESS) (DC coupled).</li> <li>Stage 2 (d): Construction of 450MWp/900MWh centralised BESS (AC coupled).</li> <li>Stage 3: Operation of the Goulburn River Solar Farm.</li> <li>Stage 4: Decommission and rehabilitation at end of life.</li> </ul> </li> <li>At the time of the audit, the Department had not made a determination on the staging request.</li> </ul>		Compliant
61.	C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Noted – not required to date		Not Triggered
62.	C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in	Noted – not required to date		Not Triggered



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		accordance with the condition that requires the strategy, plan or program.			
63.	C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Noted – not required to date		Not Triggered
NOTIFI	CATIONS				
64.	C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal 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 commencing the relevant stage and clearly identify the development that would be carried out during the relevant stage.	Notification of construction commencement was sent to the Department on 28/05/2025, notifying that construction would commence on 29/05/2025. The Department acknowledged this on 03/06/2025.  Copies of the correspondence was provided as evidence to support notification of the commencement of construction.		Compliant
65.	C8	Final Layout Plans  Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website including details on the siting of solar panels and ancillary infrastructure.	Final Layout Plans were submitted to DPHI on 14/04/25.		Compliant
66.	C9	The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	Note		Compliant



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67.	C10	Work as Executed Plans  Prior to commencing 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 via the Major Projects website.			Not Triggered
68.	C11	Incident Notification  The Planning Secretary must be notified in writing via the Major Projects website 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. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	No reportable incidents occurred to date.		Not Triggered
69.	C12	Non-Compliance Notification  The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance.	The Department has been notified of project non-compliances within 7 days of becoming aware of the non-compliance.		Compliant
70.	C13	A non-compliance 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, or will be, undertaken to address the non-compliance.	The non-compliance notification, dated 10 June 2025, was reviewed and found to include the reason for the non-compliance as well as the remedial actions undertaken to address it.		Compliant
71.	C14	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	No incident notified as a non-compliance.		Not Triggered



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
INDEP	ENDENT E	ENVIRONMENTAL AUDIT			
72.	C15	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	This is the initial audit of the development which has been carried out within 12-weeks of commencement of construction, notified as 29/05/2025.		Compliant
73.	C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:  (a) review and respond to each Independent Audit Report prepared under condition C15 of this consent, or where notice is given by the Planning Secretary;  (b) submit the response to the Planning Secretary; and  (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.	This is the first independent audit of the development. Review of compliance with Condition C16 will be verified at the next independent audit.		Not Triggered
74.	C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements</i> (2020) unless otherwise agreed by the Planning Secretary.	This is the first independent audit of the development. Review of compliance with Condition C17 will be verified at the next independent audit.		Not Triggered
75.	C18	Notwithstanding the requirements of the <i>Independent</i> Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent	Operational phase is not yet triggered.		Not Triggered



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		operational audits have demonstrated operational compliance.			
ACCES	S TO INF	ORMATION			
76.	C19	The Applicant must:  (a) make the following information publicly available on its website as relevant to the stage of the development:  (i) the EIS;  (ii) the final layout plans for the development;  (iii) current statutory approvals for the development;  (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan);  (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;  (vi) how complaints about the development can be made;  (vii) a complaints register;  (viii) compliance reports;  (ix) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and  (x) any other matter required by the Planning Secretary; and  (b) keep this information up to date.	The project website is Goulburn River solar   Lightsource bp Australia.  (a) The following information is available on project website:  (i) EIS;  (ii) Early Access Layout Plan;  (iii) Statutory approvals;  (iv) Environmental Management Strategy,  Biodiversity Management Plan, Traffic Management Plan, Heritage Management Plan;  (v) N/A;  (vi) Information under Get involved section;  (vii) Complaints Register updated 6 June 2025;  (viii) not triggered  (ix) This is the 1st Independent environmental audit – Not triggered.  (x) No matter required by DPHI;  (b) The information is up to date.		Compliant



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APPE	ENDIX 3: G					
77.		The VPA must include provisions for the payment, collection, management and distribution of the contributions under the agreement, with a focus on funding community enhancement in the area surrounding the project site.		The VPA with UHSC was sighted by the auditor during the audit, confirming payment made.		Compliant
		Council	Payment Details			
			Annual contributions at the greater of: \$346 (increased by CPI) multiplied by the number of megawatts installed; or \$190,000 (increased by CPI).			



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APPE	ENDIX 4: R	OAD UPGRAI	DES AND	SITE ACCESS			
78.	A4.1	Road / Intersection Golden Highway/Ring wood Road intersection	<b>Location</b> Figure 5	Upgrade Requirements  Construction of a new 325m acceleration / merge lane for the left turn from Ringwood Road onto Golden Highway for westbound vehicles. Extension of the existing Golden Highway westbound and Ringwood Road left-in deceleration lane taper to 30 m.  Relocate the safety barrier to ensure complaint BAR treatment.	The Golden Highway/Ringwood Road intersection works and the Barnett Street turning facility upgrade works have been completed.  Ringwood Road and Wollara Road upgrade works are ongoing.		Compliant
		Barnett Street Ringwood Road	Figure 6 Figure 7	Sealing of the first 30m of Barnett St from the intersection with Golden Highway.  Widening and resealing of a 1.8 km section of Ringwood Road between Bow River and Killoe Creek.  Upgrade/replace culverts at Bow River and Killoe Creek as required.			
		upgrades.  Upgrades muamended by  Under Part 4	ust comply w TfNSW supp .4.2 of the E	Realignment, widening and sealing of an additional 1.6 km section of Ringwood Road between Killoe Creek and Binks Road.  Realignment, widening and sealing of a 4.7 km unpaved section of Wollara Road between the Goulburn River National Park boundary and 1621 Wollar Road.  The 8 in this Appendix for the location of the road with the Austroads Guide to Road Design (as polements).  P&A Act, the Applicant is required to obtain consent Roads Act 1993 from the relevant road authority prior			



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APPI	PENDIX 7: INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS, WRITTEN INCIDENT NOTIFICATION REQUIREMENTS									
79.	A7.1	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under Condition C11 or, having given such notification, subsequently forms the view that an incident has not occurred.	No incidents to date.		Not Triggered					
80.	A7.2	<ul> <li>Written notification of an incident must:</li> <li>(a) identify the development and application number;</li> <li>(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</li> <li>(c) identify how the incident was detected;</li> <li>(d) identify when the applicant became aware of the incident;</li> <li>(e) identify any actual or potential non-compliance with conditions of consent;</li> <li>(f) describe what immediate steps were taken in relation to the incident;</li> <li>(g) identify further action(s) that will be taken in relation to the incident; and</li> <li>(h) identify a project contact for further communication regarding the incident.</li> </ul>	No incidents to date.		Not Triggered					
81.	A7.3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	No incidents to date.		Not Triggered					



ID No	Req. No.	SSD 33964533 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
82.	A7.4	The Incident Report must include:  (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and	No incidents to date.		Not Triggered
		(d) details of any communication with other stakeholders regarding the incident.			

# Appendix F – Consultation



# Appendix G – Audit Photos





Golden Highway & Ringwood Road intersection upgrade

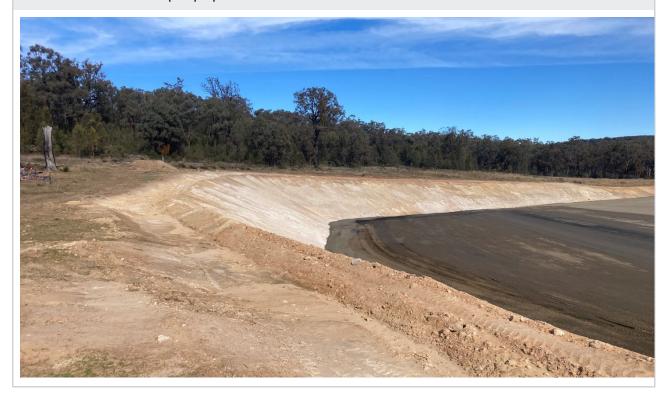


Solar farm site Safety Noticeboard





Workers accommodation pad preparation works







Transgrid pad earthworks



Transgrid pad earthworks ERSED controls





#### Diesel storage



Hazardous goods storage





Slab Hut heritage site



Slab hut heritage site No-Go Zone demarcation





Heritage site 37-01-1027



Topsoil stockpile





Water cart active on site



