




# Operational Independent Environmental Audit

West Wyalong Solar Farm - SSD 9504  
Lightsource Development Services Australia Pty Ltd

14 September 2023



## Document Control

Key Project Details Client		
Client	Lightsource bp Development Services Australia (LSbp)	
Project	West Wyalong Solar Farm (WWSF)	
Construction Contractor	PCL Constructors Pacific Rim Pty Ltd (PCL).	
Operations Contractor	Ventia Asset Infrastructure Services Pty Ltd (Ventia)	
Client manager / Role	Georgia King - Development Manager LSbp	
Independent Environmental Auditor	Peter Marshman - J2M Systems Pty Ltd.	
IEA Prepared for		Georgia King - Development Manager LSbp
IEA Prepared by		Peter Marshman - Director J2M Systems Pty Ltd
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Issue No.	Date	Details of Revision
Draft	24 August 2023	Draft issued for comment.
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 	<p>We acknowledge the traditional owners and custodians of the land on which we work and we pay respect to their Elders, past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples today.</p>	

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## Executive Summary

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J2M Systems Pty Ltd was engaged by Lightsource bp Pty Ltd (LSbp) to undertake this Operational independent environmental audit (Operational IEA) at the West Wyalong Solar Farm (WWSF / 'the Project') in accordance with Schedule 4, Condition 6 of the NSW Department of Planning and Environment (NSW DPE) Development Consent SSD 9504 ('Development Consent') as modified. Development Consent was granted on 28 November 2019 and has been modified on two occasions at the date of this audit, being SSD 9504 Modification 1 – Road Upgrades, approved 22 September 2021, and SSD 9504 Modification 2 – Subdivision for Substation, approved 26 July 2022.

The Development Consent, which is the scope of this audit, includes conditions for construction, operation, upgrading and decommissioning of a 90megawatt (MW) photovoltaic (PV) energy generation facility and associated infrastructure, including grid connection and battery storage at West Wyalong, central west New South Wales (NSW). The project is located on a 562hectare (ha) site approximately 17 kilometres (km) north-east of West Wyalong, between Blands Lane and Myers Lane within the Bland Shire Council Local Government Area (LGA).

The Project commenced construction on 07 August 2021. The Project proponent is LSbp. LSbp engaged PCL Constructors Pacific Rim Pty Ltd (PCL) as the engineer, procure and construct contractor (EPC Contractor) responsible for construction of the Project, which is now complete. The Project commenced operations on 15 April 2023. LSbp has engaged Ventia Asset Infrastructure Services Pty Ltd (Ventia) as the Operations and Maintenance Contractor for the operational phase of the Project.

In accordance with Schedule 4, Condition 6 of the Development Consent, J2M Systems was formally commissioned by LSbp on 09 July 2021 to carry out this Operational IEA, being the second IEA on the project. The auditor was approved by NSW Department of Planning and Environment (NSW DPE) in correspondence dated 22 May 2023. This Operational IEA was initiated within three months of commencement of operations.

The audit methodology included:

- Audit planning discussion with LSbp representatives with regard to audit timing, provision of documentation, site visits and personnel involvement.
- Review of audit documentation provided by LSbp and its representatives.
- Consultation with relevant Government agencies, Registered Aboriginal Parties and the key stakeholders as identified by LSbp and NSW DPIE.
- Site inspection undertaken Tuesday 17 July 2023 and Thursday 19 July 2023.
- Review of additional audit documentation provided by LSbp and its representatives during and after the audit site inspection via email submission between 20 July and 25 August 2023.
- Submission of draft report to LSbp 24 August 2023 for review of adequacy and as an opportunity for LSbp to confirm findings and/or provide additional information.
- Finalisation of report on 14 September 2023.

The audit scope assessed compliance with the requirements of the Development Consent and management plans applicable to the operational phase of the project at the time of the audit. A detailed audit table is presented in Appendix A identifying audit evidence, findings and recommendations. Section 3 of this report presents the audit findings, including an assessment of the adequacy of management plans and summary of environmental performance. Section 4 of this report presents non-compliances and auditor recommendations identified against the audit scope.

This audit identified: zero (0) non-compliances against 59 conditions of Project Approval; one (1) inconsistency against 63 mitigation measures proposed in the EIS; and five (5) opportunities for continual improvement.

Overall, the Project's actual impacts appear generally consistent with those predicted in the Environmental Impact Statement and are generally controlled through the Development Consent Conditions.

# 1 Introduction

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## 1.1 Project Background

J2M Systems Pty Ltd was engaged by Lightsource bp Pty Ltd (LSbp) to undertake this Operational independent environmental audit (Operational IEA) at the West Wyalong Solar Farm ('the Project') in accordance with Schedule 4, Condition 6 of the NSW Department of Planning and Environment (NSW DPE) Development Consent SSD 9504 ('Development Consent') as modified.

Urbis Pty Ltd prepared an Environmental Impact Assessment (EIS) for the project, which provides the context for the project, as well as identifying and assessing the environmental issues associated with construction and operations of the solar farm. The EIS was available on the project website at the time of this audit.

Development Consent was granted on 28 November 2019 and has been modified on two occasions at the date of this audit, being SSD 9504 Modification 1 – Road Upgrades, approved 22 September 2021, and SSD 9504 Modification 2 – Subdivision for Substation, approved 26 July 2022. The Development Consent, which is the scope of this audit, includes conditions for construction, operation, upgrade and decommissioning of a 90 MW AC PV solar farm at West Wyalong. The site is located approximately 15.8kms north-east of the West Wyalong town centre on the south-east side of Blands Lane. The site is situated within the Bland Shire Council Local Government Area (LGA).

The Project commenced construction on 07 August 2021. The Project proponent is LSbp. LSbp engaged PCL Constructors Pacific Rim Pty Ltd (PCL) as the engineer, procure and construct contractor (EPC Contractor) responsible for construction of the Project, which is now complete.

The Project commenced operations on 15 April 2023. LSbp has engaged Ventia Asset Infrastructure Services Pty Ltd (Ventia) as the Operations and Maintenance Contractor for the operational phase of the Project.

This audit considers all relevant conditions of the development consent (CoC), as well as the mitigation measures proposed within the environmental impact assessment, as applicable to the operational phase of the development. The audit is consistent with the Independent Audit Post Approval Requirements (NSW DPE 2020). NSW DPE approved Peter Marshman of J2M Systems as the auditor via correspondence dated 22 May 2023 (Refer to Appendix B).

## 1.2 Scope of Work

The frequency of the independent environmental audit is pre-determined by Schedule 4, Condition 6 of the Development Consent, and is reproduced here:

The audits must be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2020) to the following frequency

- a) within 3 months of commencing construction;
- b) within 3 months of commencement of operations.

The scope of the audit is also defined in Section 3.3 of the Independent Audit Post Approval Requirements (DPE 2020), and is reproduced here:

*An Independent Audit must include:*

1) *an assessment of compliance with:*

- a) *all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;*
- b) *all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and*

- 2) *a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:*
  - a) *actual impacts compared to predicted impacts documented in the environmental impact assessment;*
  - b) *the physical extent of the development in comparison with the approved boundary;*
  - c) *incidents, non-compliances and complaints that occurred or were made during the audit period;*
  - d) *the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and*
  - e) *feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;*
- 3) *the status of implementation of previous Independent Audit findings, recommendations and actions (if any);*
- 4) *a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and*
- 5) *any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.*

The criteria of the audit included the requirements of:

- Operational activity.
- Works undertaken since completion of the Construction IEA site inspection on 22 October 2021.
- The Development Consent (Appendix A – Audit Table);
- Strategies/management Plans/programs required by the Development Consent conditions during the operational phase, being:
  - Environmental Management Strategy;
  - Operational Environmental Management Plan;
  - Accommodation and Employment Strategy;
  - Biodiversity Management Plan;
  - Heritage Management Plan;
  - Traffic Management Plan;
  - Landscaping Plan; and
  - Emergency Response Plan.

### **1.3 Audit Period**

The audit period is defined as the period between the completion of the Construction IEA site inspection, 22 October 2021, and the completion of the site inspection for this Operational IEA, 19 July 2023. This Operational IEA commenced within three (3) months from the commencement of Operations, reported as 15 April 2023, which is consistent with the requirements of Development Consent SSD 9504 Schedule 4, Condition 6.

This audit focuses on the operational requirements of the WWSF. Construction requirements are considered to have been assessed in the Construction IEA by J2M Systems in November 2021.

## 1.4 Audit Team

In accordance with Section 3.1 of the NSW DPE Independent Audit Post Approval Requirements (NSW DPE May 2020), this Construction was completed by Peter Marshman of J2M Systems Pty Ltd. NSW DPE approval of the auditor is provided in Appendix B of this report. No technical specialists were nominated or requested for this audit. The Auditor's declaration of independence is provided in Appendix D of this report.

## 1.5 Methodology

### 1.5.1 Document review

Preparation for this Operational IEA involved a desktop review of the documentation identified in the scope of this audit (Refer to Section 2.2). Table 3 in Section 3.1 of this report outlines a high-level summary of main approvals and documents considered during this Operational IEA. An audit checklist was developed as part of this review (Appendix A – Audit Table). An adequacy assessment of plans and programs required under the consent is provided in Section 3.4 of this report. The Auditor is a general environmental management systems auditor and is not qualified as a technical expert in any of the specialist topics of the management plans that were reviewed.

In accordance with Section 3.7.2 of the Post Approval Audit Requirements (NSW DPE 2020), adequacy of the management plans has been determined by:

- review of the plan(s) against the relevant conditions of consent and if the content is adequate;
- consideration that the plan(s) have been reviewed and approved by relevant agencies; and
- consideration of the environmental performance of the project with regard to the content and implementation of the plan.

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

### 1.5.2 Opening and Closing Meeting

An opening meeting was held on Tuesday 17 July 2023 to introduce the auditor to the Project management team and to outline the audit process and confirm audit arrangements.

An interim closing meeting was held on Thursday 19 July 2023 to provide a summary of audit findings at the time, noting that further review of evidence was required prior to finalising audit findings.

The issue of the draft report, on 24 August 2023, is considered as the close of the audit.

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

Table 1: Audit attendance

Name	Company	Role
Georgia King	Lightsource bp	Development Manager
Rebin Anvar	Lightsource bp	Associate Asset Manager
Michelle Housego	Lightsource bp	HSE Advisor
Jaemes Skinner	Ventia	NSW Operations Manager – Electricity & Gas   Infrastructure Services
Mark Wintle	PCL	EPC Site Manager
Rishi Rant	PCL	Design and Commissioning Engineer
Jennifer Klease	PCL	Safety Advisor
Peter Marshman	J2M Systems	Independent Environmental Auditor

### 1.5.3 Site inspection and Interviews

Site inspection and interviews with relevant site personnel were undertaken by Peter Marshman between 18 – 20 July 2023 to discuss and obtain evidence to determine the compliance status of the project and to assess the effectiveness of environmental management measures on site, including a check of all active work areas at the time of the audit, remediation areas, aboriginal heritage sites and environmental protection zones. Outcomes of the site inspections are provided in Section 4.3.1. Outcomes of interviews are within this report generally, and within Appendix A – Audit Table.

### 1.5.4 Reporting

The audit report was developed between 05 July 2023 and 24 August 2023. A draft report was provided to LSbp via email dated 24 August 2023. The audit report was finalised on 14 September 2023.

### 1.5.5 Compliance Status Descriptors

The compliance status of each compliance requirement in the Audit Table (Appendix A) has been determined using the relevant descriptors in Table 2 below as required by the NSW DPE Independent Audit Post Approval Requirements, May 2020.

Table 2: Compliance Status Descriptors

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



## 1.6 Site Description and Operation

### 1.6.1 Site Location

The Project is located approximately 17kms north-east of the West Wyalong town centre on the south-east side of Blands Lane. West Wyalong is located in central west New South Wales and within the Bland Shire Council (LGA).

As set out in the EIS (Urbis, 2019) the solar farm infrastructure is located within the boundaries of a single property (Lot 18 in DP753081). Site access is via the northern boundary of adjacent Lot 17 to Blands Lane. The solar farm will connect via overhead or underground lines in Myers Lane to the existing 132kV overhead transmission line (Lake Cowal Mine to Temora to Wagga North). The Applicant has secured a long-term lease of the site to enable the solar farm to operate for 30 years with an option for a further 10 years (Urbis, 2019).

As reported in s7.4 of the EIS (Urbis, 2019), the site is located within the traditional boundaries of the Wiradjuri language group, which is considered the largest tribal grouping in Australia. The territory extends from the Blue Mountains in the east, north to Nyngan and south to Albury.

Full details of the site, including proposal layout, key environmental issues and site constraints are detailed within the Project Environmental Impact Statement, prepared by Urbis Pty Ltd, January 2019.



Figure 1: Regional Project location. Sourced from West Wyalong Solar Farm, Environmental Impact Statement, Urbis Pty Ltd, January 2019.

## 2 Consultation with relevant agencies

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

- NSW Department of Planning and Environment (NSW DPE)
- NSW Environmental Protection Agency (NSW EPA)
- Transport for New South Wales (TfNSW)
- Biodiversity and Conservation Division (BCD)
- Heritage NSW - Aboriginal cultural heritage (ACH)
- Heritage NSW – Heritage Council of NSW

The following stakeholders were notified of a request for consultation independently via email on 30 May 2023 as they were not available for selection on the Major Projects Portal:

- Bland Shire Council
- Wyalong Local Aboriginal Land Council (Wyalong LALC)
- Young Local Aboriginal Land Council (Young LALC).

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

### 2.1 NSW DPE

Katrina O'Reilly, Team Leader Compliance, NSW DPE provided correspondence dated 25 May 2023 endorsing the appointment of Peter Marshman from J2M Systems to undertake the audit in accordance with Schedule 4 Condition 6 of the Consent, and noting conditions for submission of the audit report within 2 months of completing the IEA site inspection.

### 2.2 NSW EPA

No response was received from NSW EPA.

### 2.3 Transport for NSW

Cam O'Kane, Case Officer, Development Services South for TfNSW provided a response on 26 June 2023 identifying the following matters relevant to environmental performance and this IEA:

- TfNSW notes that in determining the application under Part 4 of the *Environmental Planning & Assessment Act 1979* it is the consent authority's responsibility to consider the environmental impacts of any road works that are ancillary to the development (such as removal of trees, relocation of utilities, stormwater management, etc). Depending on the nature of the works, the Council may require the developer to submit a further environmental assessment for any ancillary road works.

**Auditor Response:** *The auditor requested LSbp to review and identify if Council made any relevant determination re: ancillary road works, if any.*

- TfNSW notes that the proponent has upgraded the intersection of Bodells Road with the Newell Highway as required by Condition 5 of the Development Consent SSD 9504 Mod-1 dated 22 September 2021;
- Additionally, the applicant prepared and submitted a Traffic Management Plan to TfNSW which was required by Condition 7 of the aforementioned Consent.

**Auditor response:** *Noted.*

## 2.4 Biodiversity and Conservation Division (BCD)

Andrew Fisher, Senior Team Leader, Planning South West – BCD provided a response dated 21 June 2023 nominating the following points in relation to the scope of the audit:

- Actions in the Biodiversity Management Plan: Please ensure that the actions listed in Tables 4-1 and 4-2 (Operation) have been implemented where required.

**Auditor response:** *Implementation of the Biodiversity Management Plan, including the requirements of Tables 4-1 and 4-2 were considered and addressed in Audit Table – Appendix A, CoC 3.13.*

- Conditions: Schedule 3, Condition 8. Vegetation buffer - Ensure the vegetation buffer has been planted and that it is being maintained with appropriate weed management.

**Auditor response:** *Addressed in Audit Table – Appendix A, CoC 3.8.*

## 2.5 Heritage NSW - Aboriginal Cultural Heritage (ACH)

Corey O’Driscoll, Senior Assessment Officer, Heritage NSW provided a response on 27 June 2023 identifying the following matters for consideration:

- In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes Condition 19 for the avoidance of impacts to sites WWSF Bee Tree (#43-4-0058) and the part of site WWSF AS01 (part of #43-4-0057) outside of the development footprint and the requirements for development of a Heritage Management Plan. It is recommended that the Department of Planning and Environment’s Compliance Team be contacted ([info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)) to determine if there is any non-compliance with Conditions of Consent for the project.

**Auditor response:** *NSW DPE were contacted via email 05 July 2023 requesting input into the determination of compliance of the condition 19. This matter was discussed with Michael Wood (NSW DPE Compliance) and confirmed in correspondence 11 July 2023 with Wendy Illingworth, NSW DPE Compliance and Regulation Officer – Biodiversity and Conservation – South West. The matter was resolved through an Enforceable Undertaking which is published on the Major Projects Website.*

## 2.6 Heritage NSW - Heritage Council of NSW

Tim Smith OAM, Director, Heritage Assessments – Heritage NSW provided a response on 16 June 2023 outlining the following:

- In accordance with our previous correspondence on this project, the subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological deposits. Therefore, no state heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

**Auditor response:** *Noted.*

## 2.7 Bland Shire Council

An automated generic response acknowledging receipt of the request was received via email dated 30 May 2023. No further response was received.

## 2.8 Wyalong Local Aboriginal Land Council

No response was received from Wyalong Local Aboriginal Land Council.

## 2.9 Young Local Aboriginal Land Council

No response was received from Young Local Aboriginal Land Council.

### 3 Audit Findings

In accordance with Section 3.3 of the *Independent Audit Post Approval Requirements* (NSW DPE 2020) this section provides an assessment of the project's compliance with relevant requirements in the Development Consent, and any strategy, plans or programs required under the Development Consent.

#### 3.1 List of approvals and documents audited

Table 3 below provides a high-level summary of main approvals and documents considered during this construction IEA. Further documents included in this audit are recorded in Appendix A – Audit Table.

**Table 3: Current Approvals and Documents Audited**

Title	Prepared by	Revision	Date
Development Consent	NSW DPE	-	28 November 2019
<ul style="list-style-type: none"><li>Development Consent Modification 1 – Road Upgrade</li></ul>	NSW DPE	Mod 1	22 September 2021
<ul style="list-style-type: none"><li>Development Consent Modification 2 – Subdivision for Substation</li></ul>	NSW DPE	Mod 2	26 July 2022
Environmental Management Strategy	Pitt & Sherry	02	27 July 2021
Accommodation and Employment Strategy	Pitt & Sherry	02	20 August 2020
Biodiversity Management Plan	OzArk Environment and Heritage	3	09 December 2020
Heritage Management Plan	Artefact Heritage Pty Ltd	12	28 June 2022
Landscaping Plan	Terras Landscape Architects	H	25 August 2020
Traffic Management Plan	Pitt & Sherry	5	05 September 2021.
Emergency Response Plan	Riskcon Engineering Pty Ltd	1	16 November 2021

#### 3.2 Compliance with Conditions of Development Consent

This Operational IEA is considered to address the requirement of the scope of works to '*assess the environmental performance of the project*'. Section 4 of this report lists the conditions considered to be non-compliant, whilst the Audit Table (Appendix A) provides an assessment of the project's compliance with relevant requirements in the approval, and associated strategies, plans and programs required under the Project Approval.

Other than where noted in this audit, site environmental controls were observed as being implemented on site in accordance with the measures stipulated in the approved management plans and project approval.

Figure 2 below identifies the level of compliance as assessed against SSD 9504 Conditions of Consent and against the nominated mitigation measures of the EIS. A summary of audit findings is presented in Section 3 of this report.

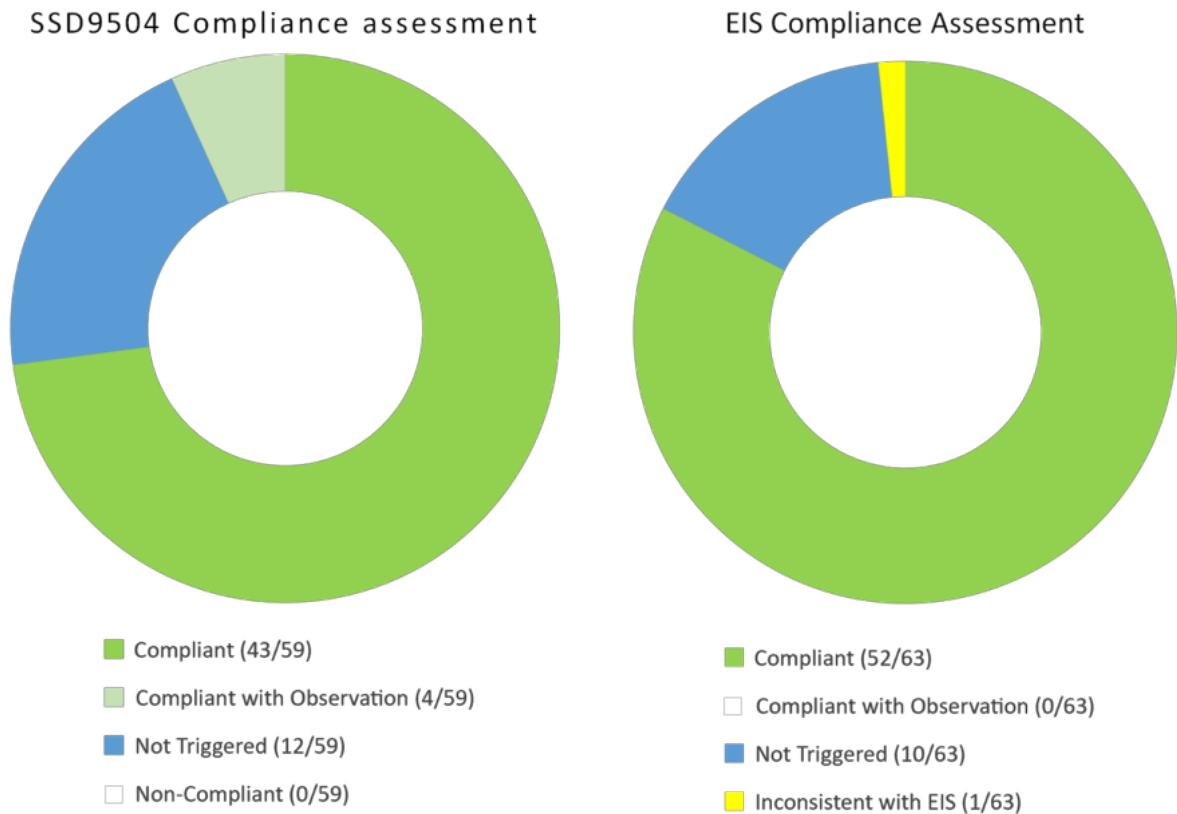


Figure 2: Compliance assessment of relevant conditions of SSD 9504 and EIS mitigation measures

### 3.3 Review of Environmental Performance

#### 3.3.1 Site Inspection Observations

Site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site. These inspections focused on a general inspection of the solar farm, including full perimeter road, key environmental and heritage zones.

The site inspections consisted of a drive across the site using a light vehicle and also included walking to some specific locations. The auditor was escorted by representatives of LSbp and PCL during the site inspections, however was able to direct where the inspection went, including stopping at locations of interest. The weather was dry and approximately 4 - 21°C, with light winds. Photos from the site inspection are included in Appendix E of this report.

The following provides a summary of observations made during the audit site inspection:

- Groundcover on site have been restored to the majority of areas disturbed during construction.
- Vegetative screen plantings were observed in all areas specified in the Landscaping Plan.
- Permanent stabilized rock crossings were established at low points on internal access roads to allow unimpeded water flow and maintain accessibility to site.
- The site was clean, free of construction waste and maintained in a tidy manner.
- Aboriginal heritage areas and environmental exclusion zones remains clearly delineated on site with permanent stock fencing and signage. There is no evidence of access or disturbance within these areas.
- Weeds were recently sprayed to control growth and die-off was visible.
- All works appear to have been undertaken within the approved construction footprint.
- Operational and maintenance facility established with suitable parking area.

### 3.3.2 Extent of Development

The solar farm is fully operational and all construction activities have been completed. All activities of the solar farm observed during the audit site inspection appeared within the approved project boundary.

### 3.3.3 Summary of notices, orders, penalty notices or prosecutions

LSbp and PCL representatives interviewed as part of this audit reported the following Enforceable Undertaking which has been issued against the project and is considered closed at the time of this audit.

#### **Summary of Enforceable Undertaking - Bee tree / Aboriginal Heritage Items incident**

As discussed in the Construction IEA (J2M Systems, November 2021), the proponent self-reported an environmental incident which occurred on 23 August 2021 where a direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Development Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree and disturbance to artefact scatter AHIMS ID 43-4-0057 which is located in the in the area surrounding the Bee Tree.

Whilst completing tree clearing operations of non-habitat trees the Bee Tree, which is identified as culturally sensitive and is protected has been incorrectly identified for removal and as a result has been felled. The tree has sustained extensive damage to the bark on one side, a number of branches have been broken away and the root system has been damaged.

PCL prepared a Bee Tree Incident Investigation Report, dated 06/09/2021, which outlines details of the incident, the events leading up to the incident, events undertaken post incident and key findings and recommendations. A Rehabilitation Management Plan for "Bee Tree" *Belah Casuarina cristata* prepared by Project Arborist Tony Manus following the incident. The recommendations in this report were observed to have been implemented by the project team.

Disturbance to artefact scatter (AHIMS ID 43-4-0057) occurred both during the initial clearing activity and in the subsequent incident corrective action activity.

**Status:** NSW DPIE, Heritage NSW and West Wyalong LALC investigated the incident. NSW DPE issued LSbp with an enforceable undertaking. The auditor discussed this outcome with Michael Wood, NSW DPE Compliance, who confirmed that all actions were complete and this matter is closed.

### 3.3.4 Summary of incidents, non-compliances and complaints

#### **Incidents**

The Auditor was advised that there were no other environmental incidents identified by or reported to the site team, with the exception of some minor spills of hydraulic fluid on site. Minor spills are considered to be spills of low volume (i.e. less than 20L), fully contained on site, did not cause or threaten material harm to the environment and were immediately contained and remediated on site.

#### **Non-compliances**

Section 3.6 of this Operational IEA provides a summary of follow up action taken to address non-compliances and recommendations raised during the Construction IEA.

LSbp and PCL representatives interviewed as part of this audit reported as part of this audit reported one new non-compliance against the requirements of the Development Consent within the audit period. The non-compliance occurred during construction and was reported to NSW DPE in accordance with the non-compliance notification requirements of Scheduled 3 Condition 3 of the Development Consent. A summary is provided below:

- LSbp self-reported a non-compliance via the Major Projects Portal on 19 January 2022. The notification set out details of the non-compliance Schedule 3, Condition 3 and 3A of the Development Consent, which relates to the approved access route. NSW DPE acknowledged this non-compliance, and upon requesting and receiving additional supporting information from LSbp noted the following:

*“The Department has reviewed the notification and notes that the Project will temporarily be in non-compliance with the approved heavy vehicle access routes set out in Conditions 3 and 3A, Schedule 3, in the Consent. The Department also notes that this non-compliance is out of the control of the Project and is a result of recent significant rain events in the area which has caused Bland Shire Council (BSC) to close all unsealed roads to vehicles that exceed three tonnes. As an interim measure, BSC have authorised heavy vehicles associated with the Project to use Clear Ridge Road and the western portion of Blands Lane”.*

## Complaints

LSbp is maintaining a feedback register and this was provided for review during the audit. No complaints relating to matters of the Development Consent or EIS had been received or recorded within the audit period. The feedback register was available on the project website at the time of this audit.

## 3.4 High-Level Assessment of Operational Environmental Management Plans

The Development Consent requires the preparation, Secretary approval, and implementation of a series of management plans. Table 4 below sets out the management plans required to be developed and approved for the Project that were assessed for adequacy during this Operational IEA:

**Table 4: Project Environmental Management Plans**

Title	Prepared by	Revision	Date
Environmental Management Strategy	Pitt & Sherry	02	27 July 2021
Accommodation and Employment Strategy	Pitt & Sherry	02	20 August 2020
Biodiversity Management Plan	OzArk Environment and Heritage	3	09 December 2020
Heritage Management Plan	Artefact Heritage Pty Ltd	12	28 June 2022
Landscaping Plan	Terras Landscape Architects	H	25 August 2020
Traffic Management Plan	Pitt & Sherry	5	05 September 2021.
Emergency Response Plan	Riskcon Engineering Pty Ltd	1	16 November 2021

In accordance with Section 3.7.2 of the Post Approval Audit Requirements (NSW DPE 2020) and as set out in Section 2.5.1, adequacy of the management plans has been determined by:

- review of the plan(s) against the relevant conditions of consent and if the content is adequate;
- consideration that the plan(s) have been reviewed and approved by relevant agencies; and
- consideration of the environmental performance of the project with regard to the content and implementation of the plan.

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

### 3.4.1 Environmental Management Strategy

An Environmental Management Strategy (EMS) was prepared and approved by the Secretary one (1) year prior to commencement of construction. The EMS was updated as required by the Secretary 12 days prior to commencement of construction. The current EMS, Revision 2.0, was available on the project website at the time of this audit, as well as being available on site. The EMS has not been updated since the Construction IEA.

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

processes for environmental monitoring and complaint management, in accordance with the relevant Conditions of Consent.

Operational requirements of the EMS include the following:

- Develop Operational Environmental Management Plan
- Site induction
- Incident reporting
- Community, stakeholder and agency consultation and complaints handling.
- Monthly site inspections
- Internal environmental audits.

The EMS is considered a concise and interpretable document includes requirements for the development and implementation of an Operational Environmental Management Plan.

### 3.4.2 Construction Environmental Management Plan

PCL prepared a Construction Environmental Management Plan (CEMP) for the construction phase of the project. Adequacy of this plan was assessed during the Construction IEA and actions to address auditor identified non-compliances and recommendations are provided in Section 3.6 of this report. This plan is no longer relevant as construction is complete and the project is now in operational phase.

#### 3.4.1 Operational Environmental Management Plan

Ventia has prepared an Environmental Management Plan (EMP) for the operational phase of the project. The EMP, Revision 2, dated 06 July 2023, was provided to and has been accepted by LSbp for implementation on the project. The EMP has been prepared to provide direction and guidance for team members and contractors on environmental expectation and compliance requirements. The plan operates inline with Ventia's overarching environmental management system, which is certified to ISO14001. Ventia's project personnel were aware of their roles and responsibilities under the EMP and a copy was available on site at the time of this audit.

The EMP adequately describes roles and responsibilities, project environmental rules, project legal requirements, approvals, and commitments, as well as specific aspects, controls and monitoring obligations. The EMP includes a planning schedule that sets out tasks, accountabilities and frequency for environmental inspections, audits, risk reviews and equipment checks.

Project meetings are required to be held with LSbp to communicate environmental performance, including incidents, inspections, audits, non-conformances, notices and training. Internally, Ventia as has stipulated a requirement for monthly SHEQ (Safety, Health, Environment and Quality) performance reporting. Overall the EMP is considered adequate for the implementation on the project, with the following improvement opportunity identified:

- **Opportunity for Improvement:** Ventia to review and revise Appendix D: SHEQ Planning Schedule to ensure it clearly captures all relevant inspection and monitoring requirements stipulated by the Development Consent, EIS, EMS, EMP and supporting plans in one centralised format, as some monitoring requirements are not recorded in this planning schedule, i.e., but not limited to, requirements for nest box monitoring twice yearly as set out in Protocol 2 of Section 5.3.2 of the EMP; requirements for weekly weed monitoring as set out in Protocol 4 of Section 5.3.2 of the EMP etc.

### 3.4.2 Accommodation and Employment Strategy

An Accommodation and Employment Strategy (AES) was prepared, in consultation with Bland Shire Council, and approved by the Secretary one year prior to the commencement of construction. The AES was assessed for adequacy during the Construction IEA and was considered to generally meet the documentation requirements of the Development Consent (Schedule 3, Condition 29). The AES relates



primarily to the construction phase which is now complete. No opportunities for improvement were identified in relation to the Operational phase of the development.

#### **3.4.3 Biodiversity Management Plan**

A Biodiversity Management Plan (BMP) was prepared, in consultation with BCS, and approved by the Secretary eight (8) months prior to commencement of construction. The current BMP, Version 3.0 dated 09 December 2020, was reviewed for construction adequacy during the Construction IEA and has not been updated since.

The BMP addresses the operational phase of the project, including monitoring and reporting requirements, accountabilities and frequency of tasks. Key monitoring and reporting requirements are set out for fauna interactions, inspection and maintenance of perimeter fencing, inspection and monitoring of nest boxes, revegetation monitoring, weed and feral pest inspections.

No opportunities for improvement were identified in relation to the operational phase of the development and the BMP is generally considered adequate for the operational phase of this project.

#### **3.4.4 Heritage Management Plan**

A Heritage Management Plan (HMP) was prepared, in consultation with relevant parties, and approved by the Secretary nine (9) months prior to commencement of construction. The HMP was assessed for adequacy during the Construction IEA.

The current HMP (Revision 12, dated 28 June 2022) was updated since the Construction IEA to address the outcomes of the Enforceable Undertaking following the self-reported non-compliance to the Department with regard to the disturbance to artefact scatter AHIMS ID 43-4-0057 and direct impact to the Bee Tree AHIMS ID 43-4-0058 and subsequent investigations by NSW DPIE, Heritage NSW and West Wyalong LALC. The updated plan was submitted to and approved by the Planning Secretary on 15 July 2022. Remaining heritage items are located within permanent no go zones (established with stock fencing and signage) or under care agreement with the West Wyalong Aboriginal Land Council.

No opportunities for improvement were identified in relation to the operational phase of the development and the HMP is generally considered adequate for the operational phase of this project.

#### **3.4.5 Landscaping Plan**

A Landscaping Plan was prepared and was approved almost one (1) year prior to commencement of construction. The Landscaping Plan adequately addressed the relevant requirements of the Development Consent and clearly identifies roles, responsibilities and tasks for pre-construction, construction and post-construction phases. Landscaping works were observed to have been undertaken in accordance with the plan. A vegetation management program and maintenance requirements are clearly stipulated in the landscaping plan. No opportunities for improvement were identified by the auditor during the documentation review and the Landscaping Plan is generally considered adequate for the operational phase of this project.

#### **3.4.6 Traffic Management Plan**

The TMP was prepared in consultation with the relevant agencies and approved by the Planning Secretary 10 months prior to the commencement of road upgrades. The TMP was assessed for adequacy during the Construction IEA.

The current TMP (Revision 05, dated 16 December 2021) was updated since the Construction IEA to address Development Consent Modification 1 to make changes to conditions 3 and 5 in Schedule 3 concerning changes to the access route and road upgrade requirements. As set out in Section 1.1. of the revised TMP, these changes include removal of a Basic Left Turn treatment at the intersection of Newell Highway and Bodells Lane, changes to the access route for heavy and over- dimensional vehicles, and removal of the requirement to include an all-weather seal on Blands Lane between Clear Ridge Road and the site access point. The TMP was also updated to reflect an approved variation request to increase the allowance for heavy vehicles under Condition 1 (a) in Schedule 3 from 25 to 50 movements

per day during Stage 2 construction works, where one movement means one vehicle entering and leaving the site.

The TMP, including the Driver's Code of Conduct, includes details on approved transport routes. The main traffic generating activities were during construction, with minimal traffic movements required during operations. Access routes remain the same for all phases of the development.

With regard to implementation, LSbp self-reported a non-compliance with Schedule 3, Condition 3 and 3A of the Development Consent relating to the approved access route. NSW DPE acknowledged this non-compliance and noted the following:

*"The Department has reviewed the notification and notes that the Project will temporarily be in non-compliance with the approved heavy vehicle access routes set out in Conditions 3 and 3A, Schedule 3, in the Consent. The Department also notes that this non-compliance is out of the control of the Project and is a result of recent significant rain events in the area which has caused Bland Shire Council (BSC) to close all unsealed roads to vehicles that exceed three tonnes. As an interim measure, BSC have authorised heavy vehicles associated with the Project to use Clear Ridge Road and the western portion of Blands Lane".*

No opportunities for improvement were identified in relation to the operational phase of the development. Works to date are generally considered to comply with the relevant requirements and thus TMP is generally considered adequate for the operational phase of this project.

### 3.4.7 Emergency Plan

Riskcon Engineering Pty Ltd has prepared an Emergency Response Plan (Revision 1 dated 16 November 2021) for the project, in consultation with and to the satisfaction of RFS and FRNSW. RFS confirmed from a rural fire perspective the plan meets all Rural Fire Service requirements, whilst FRNSW also endorsed the plan, noting satisfaction for the solar farm, but that the plan would require updating if battery storage is constructed.

Ventia as also prepared a supplementary Emergency Response Management Plan (Revision 1 dated 26 April 2023).

Implementation on site appears consistent with the plan. An asset protection zone (APZ) has been established around the perimeter of the site. This includes a 4m access track within the APZ. The APZ was observed managed with mown grass and clear access track. 2 x 22,500L water tanks are installed at the site compound with Storz fitting. Copies of the Emergency Plan were located at the main site access point.

It was reported that the local RFS has been contacted with regard to the operational phase of the development and that a site visit is being coordinated. Ventia are currently in consultation with the Local Emergency Management Committee.

Generally, given the recent review and approval by both RFS and FRNSW, the Emergency Plan appears adequate for the operational phase of this project. No opportunities for improvement were identified.

## 3.5 Actual versus Predicted Environmental Impacts

The following section provides a summary of actual vs. predicted impacts for the key environmental aspects identified in the Environmental Impact Statement (EIS) prepared by Urbis Pty Ltd, January 2019. This is a high-level summary of the predicted impacts outlined within the executive summary of the EIS, as well as an general assessment of actual impacts in the opinion of the Auditor based on evidence of management plan implementation obtained during the audit and of observations made during the audit site inspection.

NSW DPIE undertook a State Significant Development Modification Assessment of the West Wyalong Solar Farm Modification 1, report dated September 2021, assessing the proposed modification in accordance with the relevant matters for consideration under the *Environmental Planning and*

Assessment Act (EP&A Act). The Department determined that the modification would not result in any significant impacts beyond those that were assessed and approved under the existing consent.

Construction is complete and the Project is under Operational Phase at the time of the audit and hence this assessment considers both construction and operational related impacts.

The EIS outlined the following key environmental aspects:

- Biodiversity;
- Aboriginal Cultural Archaeology and Heritage;
- Land;
- Visual;
- Acoustic;
- Traffic and Access;
- Geotechnical;
- Hazards and Risks;
- Water;
- Waste; and
- Socio-Economic.

Whilst other lower risk issues were also investigated by the EIS, these impacts were assessed as acceptable and highly manageable. Table 5 below provides a summary of predicted and actual impacts for the key environmental impacts. For the benefit of the reader, the actual impacts recorded in the Construction IEA remain within this table (Construction Phase IEA). Actual impacts observed during the this Operational IEA are also recorded and the auditor comments have been updated to address status as a whole considering outcomes of both the Construction IEA and this Operational IEA.

**Table 5: Assessment of Predicted and Actual Impacts**

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
<p><b>Biodiversity</b></p> <p>The removal of 1.83 hectares of native vegetation comprising:</p> <ul style="list-style-type: none"> <li>• 0.80 hectares of ‘Belah woodland (PCT 55).</li> <li>• 1.03 hectares of Weeping Myall open woodland (PCT 26).</li> <li>• 32 paddock trees.</li> <li>• 1.83 hectares of woodland habitat for fauna species.</li> <li>• Eleven habitat trees (containing 16 hollows).</li> </ul>	<p><b>Construction Phase IEA</b></p> <p>Clearing of vegetation on site appears to have been conducted in accordance with the Approved Layout Plan and Biodiversity Management Plan.</p> <p>Project No-Go Zone fencing is now established on site in areas where construction has commenced. Trees felled for the project have been retained on site for beneficial re-use as coarse woody debris.</p> <p><b>Operational Phase IEA</b></p> <p>Clearing of vegetation on site appears to have been conducted in accordance with the Approved Layout Plan and Biodiversity Management Plan.</p> <p>Myers Lane Road Reserve was cleared in accordance with the Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines</p>	<p>The project appears consistent with predicted biodiversity outcomes at the time of this audit.</p> <p>Biodiversity offsets credits were finalised within 2 years of the development commencing as required by the requirements of this condition.</p> <p>However one inconsistently with the EIS mitigation measures was identified, being:</p> <p><b>Inconsistent implementation of EIS mitigation measure:</b></p> <p>Whilst the construction contractor (PCL) has inspected the nest boxes and permitter security fence, the inspections were not undertaken by a suitably trained fauna ecologist and a brief report was not prepared relating to nest box use, animal injury or mortality.</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
	for New Power Lines, as per the Biodiversity Management Plan. Vegetation beyond Myers Lane, but within the specified clearing zone, was able to be maintained (clearing minimised).	<b>Recommendation:</b> Undertake the required nest box monitoring and security fence inspections with a suitably trained fauna ecologist and maintained relevant records.
<p><b>Aboriginal Cultural Archaeology and Heritage</b></p> <p>Aboriginal heritage assessment of the site revealed a total of four new Aboriginal sites within the study, with the following predicted impacts:</p> <ul style="list-style-type: none"> <li>WWSF IF01 (AHIMS ID43-4-0056): Direct impact mitigated through salvage.</li> <li>WWSF IF02 (AHIMS ID43-4-0071): Direct impact mitigated through salvage.</li> <li>WWSF AS01 (AHIMS ID 43-4-0057): Direct/partial impact mitigated through salvage and no-go zone.</li> <li>WWSF Bee Tree (AHIMS ID 43-4-0058): Indirect/partial impact mitigated through no-go zone.</li> </ul>	<p><b>Construction Phase</b></p> <p>Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 were successfully salvaged in accordance with the requirements of this condition.</p> <p>The WWSF Bee Tree and areas of Artefact Scatter WWSF AS01 were observed to have been directly impacted by construction related activities, which were not mitigated through no-go zones.</p> <p><b>Operational Phase</b></p> <p>NSW DPE investigated the potential non-compliance with SSD 9504 Schedule 3, Condition 13 and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with the auditor and confirmed there are no outstanding requirements. Outcomes of the Enforceable Undertaking were also audited by Artefact Heritage Pty Ltd and found that all terms of the Enforceable Undertaking were met. The salvaged Bee Tree was observed undercover of the veranda of the West Wyalong Local Aboriginal Land Council.</p>	<p><b>Inconsistent implementation of EIS mitigation measure:</b></p> <p>The proponent self-reported a non-compliance to the Department with regard to the disturbance to artefact scatter AHIMS ID 43-4-0057 and direct impact to the Bee Tree AHIMS ID 43-4-0058.</p> <p>The non-compliance is inconsistent with predicted outcomes with regard to Aboriginal cultural heritage, however is considered closed, having been addressed through an Enforceable Undertaking.</p>
<p><b>Land</b></p> <ul style="list-style-type: none"> <li>No major land use conflicts predicted.</li> <li>Short term pressure on availability of accommodation and services.</li> <li>Land and soil capability can accommodate high</li> </ul>	<p><b>Construction Phase</b></p> <p>No land management impacts were evident or identified by the auditor at the time of the audit site inspection.</p> <p><b>Operational Phase</b></p> <p>No land management impacts were evident or identified by the</p>	<p>The project appears consistent with predicted land management outcomes at the time of this audit. No land management complaints were received and the land appears suitable for the continued use of grazing (sheep).</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
<p>impact land uses with implementation of mitigation measures.</p>	<p>auditor at the time of the audit site inspection.</p> <p>West Wyalong had available accommodation for the auditor during the site visit.</p>	
<p><b>Visual</b></p> <ul style="list-style-type: none"> <li>Minimal to no visual impact.</li> </ul>	<p><b>Construction Phase</b></p> <p>No visual impacts were evident or identified by the auditor at the time of the audit site inspection.</p> <p>Landscaping works (in accordance with the Landscape Management Plan) had not commenced at the time of the audit site inspection.</p> <p><b>Operational Phase</b></p> <p>No visual impacts were evident or identified by the auditor at the time of the audit site inspection.</p> <p>Landscape planting (in accordance with the Landscape Management Plan) has been completed and is currently being managed and maintained.</p>	<p>Landscaping works have been undertaken in accordance with the Landscape Management Plan and the project appears consistent with predicted visual impacts at the time of this audit.</p>
<p><b>Acoustic</b></p> <ul style="list-style-type: none"> <li>No expected cumulative noise effects</li> <li>No exceedances of the noise management levels.</li> </ul>	<p><b>Construction Phase</b></p> <p>No high-noise generating activities were evident at the time of the audit site inspection.</p> <p><b>Operational Phase</b></p> <p>No high-noise generating activities were evident at the time of the audit site inspection.</p> <p>No noise complaints received.</p>	<p>No noise specific complaints have been received by the Project Team at the time of this audit.</p> <p>Operational noise is minimal.</p> <p>The project appears consistent with predicted acoustic outcomes at the time of this audit.</p>
<p><b>Traffic and Access</b></p> <ul style="list-style-type: none"> <li>No significant impacts on local road network.</li> <li>Blands Lane and Bodells Lane will be maintained to an appropriate standard during and after the construction period.</li> </ul>	<p><b>Construction Phase</b></p> <p>No significant impacts to local roads were evident at the time of the audit site inspection. Road upgrade works were occurring at the time of the audit on Blands Lane, with the road open and operating under approved traffic control.</p> <p><b>Operational Phase</b></p> <p>The project did not appear to have caused an impact to the local road network.</p>	<p>The project appears consistent with predicted traffic and access outcomes at the time of this audit.</p> <p>PCL to continue to work with Bland Shire Council to finalise the road upgrades as required under this condition, and as per agreed arrangements under the approved Traffic Management Plan (Rev 5, dated 16 December 2021).</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
	<p>Blands Lane and Bodells Lane remain open and accessible to traffic, however the upgrade of Blands Lane and Bodells Lane remains ongoing at the time of this Operational IEA. The auditor acknowledged that Bland Shire Council and TfNSW were all aware of the delays due to wet weather and flood damage.</p>	
<p><b>Geotechnical</b></p> <ul style="list-style-type: none"> <li>Geotechnical impact of the development is considered to be manageable through construction practices.</li> </ul>	<p><b>Construction Phase</b></p> <p>No geotechnical impacts were evident at the time of the audit site inspection.</p> <p><b>Operational Phase</b></p> <p>No geotechnical impacts were evident or reported to the auditor at the time of the audit site inspection.</p>	<p>The project appears consistent with predicted geotechnical impacts at the time of this audit.</p>
<p><b>Hazards and Risks</b></p> <ul style="list-style-type: none"> <li>Whilst not identified as bushfire prone land, bushfire risks will be managed.</li> <li>Threshold quantities for the dangerous goods to be stored and transported are not exceeded</li> </ul>	<p><b>Construction Phase</b></p> <p>No specific bushfire risks were evident at the time of the audit site inspection.</p> <p>Dangerous good are stored within dedicated, bunded storage containers within the site laydown area. Threshold quantities have not been exceeded.</p> <p><b>Operational Phase</b></p> <p>An asset protection zone (10m defensible space) has been established around the permitter of the site. This includes a 4m access track within the APZ. The APZ was observed managed with mown grass and clear access track. 2 x 22,500L water tanks installed at the site compound with Storz fitting.</p> <p>Minimal dangerous goods stored on site (below threshold quantities).</p>	<p>The project appears consistent with predicted hazards and risk impacts at the time of this audit.</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
<p><b>Water</b></p> <ul style="list-style-type: none"> <li>Very low impact on the environment and the existing behaviour of surface and ground waters.</li> </ul>	<p><b>Construction Phase</b></p> <p>No water quality or water management impacts were evident at the time of the audit site inspection. Sediment erosion fences were observed installed as per the Sediment and Erosion Control Plan. Recent inspections have included effectiveness of sediment and erosion controls.</p> <p><b>Operational Phase</b></p> <p>Solar panels and ancillary infrastructure, including security fencing appears to have been designed and constructed to with consideration to flooding and groundwater.</p> <p>Access roads include dedicated high-flow water crossings, including stabilised rock checks.</p> <p>Sediment and erosion is to be monitored throughout operations, but no negative impacts were observed during the Operational IEA site inspection.</p>	<p>The project appears consistent with predicted water impacts at the time of this audit.</p>
<p><b>Waste</b></p> <ul style="list-style-type: none"> <li>Waste management practices will be suitable for the management of waste generated during the construction and operation phases of the proposal.</li> <li>Majority of waste generated during the construction and operation phases will either be reused or recycled, with the remainder set to landfill.</li> </ul>	<p><b>Construction Phase</b></p> <p>No waste related impacts were evident at the time of the audit site inspection. The site compound was maintained in a clean and tidy manner.</p> <p>Dedicated recycling and landfill bins were provided within the site compound and laydown areas.</p> <p><b>Operational Phase</b></p> <p>A waste register has been used to record details of waste removed from site. Waste is classified and general solid waste (mixed waste), recycling (cardboard, steel, timber) and waste water. Waste dockets and receipts, including from Bland Shire Council are also maintained.</p> <p>No waste issues identified during the audit site inspection.</p>	<p>The project appears consistent with predicted waste impacts at the time of this audit.</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audits)	Auditor Comments
<p><b>Socio-Economic</b></p> <ul style="list-style-type: none"> <li>• Long term positive impact for NSW by increasing the supply of renewable energy in NSW and reducing greenhouse gas emissions.</li> <li>• It will also deliver local employment and economic benefits to Bland Shire LGA</li> </ul>	<p><b>Construction Phase</b></p> <p>No specific socio-economic issues were evident at the time of the audit site inspection.</p> <p><b>Operational Phase</b></p> <p>No specific socio-economic issues were evident at the time of the audit site inspection.</p>	<p>The project appears consistent with predicted socio-economic outcomes at this time.</p>



### 3.6 Status of Previous Audit Recommendations

This section provides a summary of the status of opportunities for improvement and auditor recommendations as identified during the Construction IEA.

Definition of reference:

	Non-compliant in 2020 Construction IEA, with Auditor Recommendation
	Compliant in 2020 Construction IEA, with Auditor Recommendation
	Corrective action taken, actions agreed and finding now closed.
	Corrective action remains incomplete.

Table 6: Status of Audit Recommendations

Reference	Approval ID	Specific requirement (summarised for relevance to OFI)	Construction IEA Findings and Recommendation	Status as assessed in 2023 Operational IEA.
WWSF-IEA-2021 NC 01	Schedule 3, Condition 13	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with <b>BCS</b>, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> <li>• managing the remnant vegetation and fauna habitat on site;</li> <li>• protecting vegetation and fauna habitat outside the approved disturbance areas;</li> <li>• minimising the clearing of native vegetation and fauna habitat within the Myers Lane road reserve;</li> <li>• minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</li> <li>• minimising the impacts to fauna on site and implementing fauna management protocols;</li> <li>• avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna;</li> <li>• rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area;</li> <li>• maximising the salvage of vegetative and soil</li> </ul>	<p>A site inspection was undertaken as part of the audit. Project No-Go Zone fencing is now established on-site within active construction areas.</p> <p><b>Non-compliance WWSF IEA NC1</b></p> <p>Environmental protection measures listed in Tables 4-1 and 4-2 were generally observed implemented during the audit site inspection, including no-go zones, sediment and erosion control, inspection of work areas. However, based on the reported incident (refer to Self-Reported Non-Compliance below), the ecologist was not present during all vegetation clearing on site, no-go zones were not established prior to clearing commencing, and vegetation clearing was not monitored to ensure compliance which in non-compliant with the mitigation measures provided within Table 4-1 and thus non-compliant with the implementation requirements of this condition.</p> <p><b>Self-Reported Non-compliance NC1</b></p> <p>The proponent has self-reported a non-compliance with Condition 19 and 20 of SSD 9504 to the Department and other relevant agencies and stakeholders with</p>	<p>A site inspection was undertaken as part of the audit.</p> <p>No go zones, established during the construction phase with permanent stock fencing and signage, remain in place and there is no evidence that these have been breached by construction or operational processes.</p> <p>The majority of clearing was undertaken prior to the construction audit. A pre-clearance survey was undertaken for Myers Lane and an ecologist was present as a spotter during clearing works. One habitat tree was maintained, reflecting the effort to minimise clearing where possible.</p> <p>Groundcover rehabilitation has occurred across the site, including hydro mulching works.</p> <p>Habitat boxes remain in place and have been checked throughout both construction and operational phases.</p> <p>No issues were observed in relation to feral pests, sediment and erosion control, dust control or rehabilitation.</p> <p><b>Non-compliance WWSF IEA NC1 - CLOSED</b></p> <p>NSW DPE investigated the potential non-compliance</p>

		<p>resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and</p> <ul style="list-style-type: none"> <li>controlling weeds and feral pests;</li> </ul> <p>(b) include a fauna monitoring and management protocol, including identification and reporting of fauna mortalities to BCS; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>regard to the Bee Tree Incident on 23 August 2021.</p> <p>Investigations into the non-compliance remain ongoing, however it is apparent that no-go fencing was not installed by the Construction Contractor prior to construction activities commencing and therefore the requirements of the Protocol 13 of the Biodiversity Management Plan were not complied with.</p> <p><b>Auditor Recommendation:</b></p> <p>No-go fencing to be installed in all remaining non-active construction areas (e.g. Myers Lane) to ensure it is effectively in place prior to construction activities commencing in these areas.</p>	<p>with SSD 9504 Schedule 3, Condition 13 and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with the auditor and confirmed there are no outstanding requirements. Outcomes of the Enforceable Undertaking were also audited by Artefact Heritage Pty Ltd and found that all terms of the Enforceable Undertaking were met. The salvaged Bee Tree was observed undercover of the veranda of the West Wyalong Local Aboriginal Land Council.</p> <p>On the basis that no further non-compliance has been identified within this audit period and that the Enforceable Undertaking is considered closed, the is generally considered complaint with the requirements of this condition.</p> <p><b>Self-Reported Non-compliance NC1 – Closed.</b></p>
<b>Status:</b>				<b>Closed</b>
<b>WWSF-IEA-2021 NC 02</b>	Schedule 3, Condition 21	<p>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.</p> <p><i>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.</i></p>	<p><b>Non-Conformance</b></p> <p>The Proponent has not obtained the necessary water licences for the development.</p> <p><b>Auditor recommendation:</b></p> <p>Proponent to obtain necessary water licences for the project.</p>	<p>PCL engaged with relevant Government agencies regarding the process to obtain a Water Access Licence for the extraction of water from the dam located on site.</p> <p>As there are no water allocations that can be purchased in the local area, PCL did not obtain a water licence. All water for the project during construction was purchased from Goldenfields Water County Council and Clear Ridge Enterprises Pty Ltd.</p> <p>Rain water is being collected from the roof of the Operation and Maintenance Building for domestic and potential stock use during the operational phase.</p>
<b>Status:</b>				<b>Closed</b>

<p><b>WWSF-IEA-2021 NC 03</b></p>	<p>Schedule 4, Condition 1</p>	<p>Prior to commencing the development, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) provide the strategic framework for environmental management of the development;</li> <li>(b) identify the statutory approvals that apply to the development;</li> <li>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>(d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise;</li> <li>• respond to any non-compliance;</li> <li>• respond to emergencies; and</li> </ul> </li> <li>(e) include: <ul style="list-style-type: none"> <li>• references to any plans approved under the conditions of this consent; and</li> <li>• a clear plan depicting all the monitoring to be carried out in relation to the development.</li> </ul> </li> </ul> <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p><b>Non-compliant – Implementation of the CEMP</b></p> <p>The HSE Plan has been inconsistently implemented on site, with requirements such as environmental risk register and project environmental checklist not being completed and regular site environmental inspections being completed following a different process than that described in the HSE Plan (i.e. using a different checklist to the one nominated in the HSE Plan). The site risk register provided for review during the audit did not identify or assesses environmental aspects and impacts.</p> <p>The risk register provided does not adequately identify or assesses environmental aspects and impacts.</p> <p>Whilst site inspections are occurring on site, the completion of these is ad-hoc and the forms used for the inspections are inconsistent and/or informal. Inspection records were provided for October, however construction commenced in early August 2021.</p> <p><b>Auditor Recommendations:</b></p> <ul style="list-style-type: none"> <li>• A detailed internal audit be promptly undertaken on the PCL HSE plan (as required by the CEMP and EMS) to verify the statements and procedures within the HSE Plan, verify implementation and to identify areas to streamline content to enable better interpretation and effective implementation on site.</li> <li>• The project risk register be reviewed and revised to adequately identify and assesses environmental aspects and impacts.</li> <li>• The implementation of the existing CEMP could be improved by establishing one concise</li> </ul>	<p>PCL updated their HSE Plan (Revision 2, 14 November 2021), in response to the recommendations identified in the Construction IEA.</p> <p>PCL also revised the Operational Risk Register to include environmental and cultural risks and control measures associated with the Project.</p> <p>An updated Project Inspection Schedule was developed to collate all inspection requirements in one centralised location.</p> <p>The Plant Register was A plant register was updated and maintained during the construction period to address the auditor recommendations made during the Construction IEA.</p>
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			<p>monitoring and accountabilities schedule depicting all the relevant inspection, monitoring and reporting requirements as outlined within all project management plans, including frequency, type, person responsible, method/form, record(s) to be maintained and reporting requirements.</p> <ul style="list-style-type: none"> <li>• There are currently 2 mobile plant registers being maintained and it is recommended these be consolidated into one register covering all plant and equipment on site, and that any identified gaps in on-boarding documentation, such as most recent maintenance records, be promptly rectified.</li> </ul>	
<b>Status:</b>				<b>Closed</b>
<b>WWSF-IEA-2021 Self Reported SR NC 01</b>	<b>Schedule 3, Condition 19.</b>	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or located outside the approved development footprint.	<p><b>Self-Reported Non-compliance</b></p> <p>The proponent has self-reported a non-compliance with the requirements of this condition to the Department and other relevant agencies and stakeholders.</p> <p>A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p> <p>Early investigations by the project team indicate that as a result of 'no go' fencing not being erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p>	<p>NSW DPE investigated the potential non-compliance with SSD 9504 Schedule 3, Condition 13 and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with the auditor and confirmed there are no outstanding requirements. Outcomes of the Enforceable Undertaking were also audited by Artefact Heritage Pty Ltd and found that all terms of the Enforceable Undertaking were met. The salvaged Bee Tree was observed undercover of the veranda of the West Wyalong Local Aboriginal Land Council.</p> <p>On the basis that no further non-compliance has been identified within this audit period and that the Enforceable Undertaking is considered closed, the is generally considered compliant with the requirements of this condition.</p>

			<p><b>Auditor Recommendation:</b></p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p>	
	Schedule 3, Condition 19A	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted and obtain a Care Agreement for the transfer and safekeeping of artefacts to the West Wyalong Local Aboriginal Land Council.</p> <p>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.</p>	<p>Refer to above. Condition 19A was established as part of SSD 9504 Modification 1, and came into effect after the incident. The self-reported non-compliance with Schedule 3, Condition 19 of the Development Consent is considered to have included the requirements of this condition.</p>	<p>Heritage NSW transferred the Aboriginal objects to West Wyalong Local Aboriginal Land Council pursuant to s85A(1)(c) of the NPW Act, under a Care Agreement which includes a number of conditions.</p> <p>Care Agreement 4658.</p>
<b>Status:</b>				<b>Closed</b>
<b>WWSF-IEA-2021 Self Reported SR NC 02</b>		<p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</li> <li>(b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders;</li> <li>(c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>• protecting the Aboriginal heritage items identified in Table 1 of Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction;</li> <li>• salvaging and relocating the Aboriginal heritage items located within</li> </ul> </li> </ul>	<p><b>Self-Reported Non-compliance</b></p> <p>A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p> <p>Early investigations by the project team indicate that as a result of 'no go' fencing not being erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p> <p><b>Auditor Recommendation:</b></p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p>	<p>NSW DPE investigated the potential non-compliance with SSD 9504 Schedule 3, Condition 13 and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with the auditor and confirmed there are no outstanding requirements. Outcomes of the Enforceable Undertaking were also audited by Artefact Heritage Pty Ltd and found that all terms of the Enforceable Undertaking were met. The salvaged Bee Tree was observed under cover of the veranda of the West Wyalong Local Aboriginal Land Council.</p> <p>On the basis that no further non-compliance has been identified within this audit period and that the Enforceable Undertaking is considered closed, the is generally considered complaint with the requirements of this condition.</p>

		<p>the approved development footprint, as identified in Table 2 of Appendix 3;</p> <ul style="list-style-type: none"> <li>• a contingency plan and reporting procedure if: <ul style="list-style-type: none"> <li>- previously unidentified heritage items are found; or Aboriginal skeletal material is discovered;</li> <li>- 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</li> <li>- ongoing consultation with Aboriginal stakeholders during the implementation of the plan;</li> </ul> </li> <li>• include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</li> </ul> <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>		
<b>Status:</b>				<b>Closed</b>
<i>OFI 1</i>			<p>LSbp and PCL must ensure the requirements of the Biodiversity Management Plan are implemented for all future clearing on site.</p>	<p>A site inspection was undertaken as part of the audit.</p> <p>No go zones, established during the construction phase with permanent stock fencing and signage, remain in place and there is no evidence that these have been breached by construction or operational processes.</p> <p>The majority of clearing was undertaken prior to the construction audit. A pre-clearance survey was undertaken for Myers Lane and an ecologist was present as a spotter during clearing works. One habitat tree was maintained, reflecting the effort to minimise clearing where possible.</p>
<b>Status:</b>				<b>Closed</b>

OFI 2			<p>In accordance with the Development Consent (Schedule 4, Condition 2), the Environmental Management Strategy and supporting management plans, including the Construction Environmental Management Plan, require review, and if necessary revision to the satisfaction of the Secretary, to address the outcomes of the reportable incident and to address relevant changes to the Development Consent following approval of Modification 1 in accordance with Schedule 4, Condition 2 of the Development Consent.</p>	<p>LSbp reviewed the management plans following the Construction IEA. The Heritage Management Plan was updated and resubmitted to the Planning Secretary for approval (Version 12, June 20220) as result of the bee tree incident and enforceable undertaking.</p>
<b>Status:</b>				<b>Closed</b>
OFI 3			<p>That a process be established to restrict access to the 10m buffer adjacent to the waterway (as set out within the Biodiversity Management Plan) and ensure crossing of this waterway is restricted to the designated road way crossing.</p>	<p>No go zones were established during the construction phase with permanent stock fencing and signage. Designated waterway crossings were established and remain in place. There is no evidence that these have been breached by construction or operational processes.</p>
<b>Status:</b>				<b>Closed</b>
OFI 4			<p>In response to two complaints regarding vehicle access to site it is recommended that the Driver's Code of Conduct be updated to include or specifically reference the designated vehicle access routes set out within the Traffic Management Plan.</p>	<p>The Driver's Code of Conduct includes the details on the designated vehicle access routes as set out within the Traffic Management Plan.</p>
<b>Status:</b>				<b>Closed</b>
OFI 5			<p>Whilst it is was understood by the EPC Contractor that Bland Shire Council would manage, and did undertake, community notifications with regard to the project, it is recommended that the EPC contractor provide and maintain adequate record of project updates to residents and businesses within 2 km of the Project in accordance with the Traffic Management Plan in accordance with the</p>	<p>No specific project updates were required or produced.  No further complaints were received.</p>

			Development Consent, Schedule 3, Condition 7.	
<b>Status:</b>				<b>Closed</b>
<b>OFI 6</b>			That PCL obtains and maintains a record of the Herbicide Application Report once received from Duncan Contracting and Mechanical.	Herbicide application records, prepared by Nigel Duncan, dated between 04 April and 22 May 2023 were obtained and maintained.
<b>Status:</b>				<b>Closed</b>
<b>OFI 7</b>			During the site inspection it was observed exclusion fencing installed in an area adjacent to the bee tree, however this is now redundant as permanent no-go fencing has been installed. It is recommended that the previous exclusion fencing be removed as it is currently damaged and ineffective.	This fencing was removed. Bee tree incident resolved through Enforceable Undertaking.
<b>Status:</b>				<b>Closed</b>

### 3.7 Key Strengths

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

- No-go exclusion zones established with stock fencing and signage have been maintained throughout construction and into operational phase.
- Site induction included discussion on no go zones and other key requirements.
- Site teams appear knowledgeable of key requirements.
- Operational and maintenance facilities are well established, organised and clean.
- Planting of vegetative screening has been undertaken.
- Ground cover regeneration has been successfully across site.
- Weed management (spraying) was undertaken when weather permitted.
- Local workers engaged for operation and maintenance roles.



## 4 Summary of Audit Non-Compliances and Recommendations

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

### 4.1 Non-Compliances

There were no non-compliances identified during this Operational IEA against the conditions of Development Consent.

### 4.2 Recommendations and Opportunities for improvement

The Auditor identified the following six (6) opportunities for improvement (OFI) and recommendations where the overarching conditions of Development Consent SSD 9504 (CoC) or EIS Mitigation Measures (MM) were assessed as compliant:

- **Opportunity for Improvement #1:** PCL to continue to work with Bland Shire Council to finalise the road upgrades as required under Schedule 3, Condition 5 of the Development Consent (Mod 2), and as per agreed arrangements under the approved Traffic Management Plan (Rev 5, dated 16 December 2021).
- **Opportunity for Improvement #2:** Whilst only recently demobilised and not longer than 3 months ago, the area that the former construction compound occupied requires rehabilitation in accordance with the requirements of Schedule 3, Condition 10 of the Development Consent (Mod 2).
- **Opportunity for Improvement #3 / Inconsistency against EIS mitigation measure:** Whilst nest boxes and perimeter security fence haven been inspected for damages throughout the construction and operation phases to date, these inspections have not undertaken by a suitably trained fauna ecologist and have not included monitoring observations and reporting to identify occupancy rates of nest boxes, animal injury or mortality. It is recommended that the required nest box monitoring and security fence inspections be undertaken with a suitably trained fauna ecologist as specified in Table 4-2 – Operations of the BMP (due in late winter and mid-summer for the first three years of operation) and as required by the EIS Mitigation Measure – Fauna Monitoring.
- **Opportunity for Improvement #4:** ChemCert accreditation for Nigel Duncan is overdue for renewed as the copy maintained on file expired on 21 March 2023.
- **Opportunity for Improvement #5:** The project website currently provides a link to the superseded Traffic Management Plan (Rev 4) rather than the approved Traffic Management Plan (Rev 5). Documentation on the website is required to be maintained in accordance with Schedule 4, Condition 7 of the Development Consent (Mod 2).
  - **Note:** LSbp took action to rectify this issue immediately and the project website has been updated at the time of finalizing this report to include all current, approved management plans (as review 13 September 2023). This OFI is considered closed.

- **Opportunity for Improvement #6:** Ventia to review and revise Appendix D: SHEQ Planning Schedule to ensure it clearly captures all relevant inspection and monitoring requirements stipulated by the Development Consent, EIS, EMS, EMP and supporting plans in one centralised format, as some monitoring requirements are not recorded in this planning schedule, i.e., but not limited to, requirements for nest box monitoring twice yearly as set out in Protocol 2 of Section 5.3.2 of the EMP; requirements for weekly weed monitoring as set out in Protocol 4 of Section 5.3.2 of the EMP etc.

## 5 Conclusion

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This Operational IEA of West Wyalong Solar Farm determined that the project is generally compliant with their environmental management obligations under the Development Consent SSD 9504 and that the actual impacts of the project appear consistent with those predicted in the Environmental Impact Statement.

This audit identified:

- Zero (0) non-compliances against 59 conditions of Project Approval;
- One (1) inconsistency against 63 mitigation measures proposed in the EIS; and
- Four (4) open opportunities for continual improvement.
- One (1) closed opportunity for continual improvement.

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

## 6 Limitations

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

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

## 7 Appendixes

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The following appendixes are attached to this document:

- Appendix A: Independent Audit Table
- Appendix B: Planning Secretary Audit Team Agreement
- Appendix C: Consultation
- Appendix D: Independent Audit Declaration Form
- Appendix E Site Inspection Photographs.
- Appendix F: Changes following issue of draft report.

## Appendix A: Independent Audit Table

## Appendix A: Independent Audit Table

### SSD 9504 Compliance Status Descriptors

Status	Abbreviation	Description
Compliant	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been met with within the scope of the audit.
Non-compliant	NC	The auditor has determined that one or more specific elements of the conditions or requirements have not been met within the scope of the audit.
Not triggered	NT	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.

**Note:** Construction works were assessed in the Construction IEA, November 2021. This Audit Table reports on operational works, but also considers overall works on site since the construction IEA. Non-compliances identified in the Construction IEA are not reproduced within this Table. Where corrective action has been taken and the matter effectively closed, previous non-compliance is considered compliant.

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2, S2.1	<b>ADMINISTRATIVE CONDITIONS</b> <b>Obligation to minimise harm to the environment</b> In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Refer to evidence collected throughout this audit table. Discussions with LSbp Development Manager Discussions with PCL Site Manager. Discussions with Ventia Operations Manager.	Based on the development and overall implementation of the project environmental management plans and on the basis that no environmental material harm incidents have occurred, the project is generally considered compliant with the requirements of this condition.	C
S2.2	<b>Terms of consent</b> The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Refer to evidence collected throughout this Audit Table. Site inspection undertaken 18 – 20 July 2023. a) This checklist includes an assessment of compliance against the mitigation measures proposed in the EIS. b) This checklist includes an assessment of compliance against each condition of consent.	This audit has individually assessed the conditions of consent and mitigation measure proposed within the EIS, with the focus of the audit being operational phase. Compliance with each condition is outlined throughout this Audit Table.	C
S2.3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	The auditor did not identify any inconsistency during the audit and no inconsistencies were reported to the auditor during interviews with the Project team.	No inconsistency identified or reported.	NT
S2.4	The Applicant must comply with any requirement/s of the <a href="#">Planning Secretary</a> arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this consent;	<b>Bee Tree incident / non-compliance:</b> Correspondence from NSW DPIE to LSbp, dated 21 September 202, re: West Wyalong Solar Farm (SSD 9504).	No outstanding actions were identified during the audit.	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>(b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>	<p>Correspondence from PCL to NSW DPE (executed 03 June 2022) re: Enforceable Undertaking by PCL to NSW DPE for the purposes of Section 9.5 of the Environmental Planning and Assessment Act 1979 (NSW).</p> <p>Correspondence from Artefact Heritage Services Pty Ltd (Artefact Heritage), dated 20 April 2023, Re: West Wyalong Solar Farm – Enforceable Undertaking Audit.</p> <p><b>Transport route non-compliance:</b> Correspondence from NSW DPE, dated 21 January 2022, regarding self-reported non-compliance with approved transport route and requesting further information.</p> <p>Correspondence from LSbp, dated 28 January 2022, responding to the NSW DPE request for information (in response to NSW DPE request dated 21 January 2022), as submitted via the Major Project Portal.</p> <p><b>Response to Construction IEA</b> Correspondence from LSbp to NSW DPE 17 December 2021 Re: Response to audit recommendations.</p>		
S2.5	<p><b>Final layout plans</b> Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the <a href="#">Planning Secretary</a>, via the <a href="#">Major Projects website</a> including details on the siting of solar panels and ancillary infrastructure.</p> <p>Note: if the construction of the development is to be staged, then the provision of these plans may be staged.</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p>	<p>Assessed as compliant in the Construction IEA. No changes to final layout plan. Not triggered by operational requirements.</p>	NT
S2.6	<p><b>Upgrading of solar panels, Battery Storage and ancillary infrastructure</b> Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide</p>	<p>Construction phase commenced 07 August 2021. Operational phase commenced 15 April 2023.</p> <p>Discussions with:</p> <ul style="list-style-type: none"> <li>- LSbp Development Manager.</li> </ul>	<p>The requirements of this condition have not yet been triggered.</p>	NT



Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.			
S2.7	<p><b>Work as executed plans</b> Prior to the commencement of operations, or following the upgrades of any solar panels, <a href="#">battery storage</a> or ancillary infrastructure, the Applicant must submit work as executed plans of the development <a href="#">showing comparison to the approved final layout plans</a> to the Department <a href="#">via the Major Projects website</a>.</p>	<p>Correspondence from LSbp to NSW DPE, dated 14 April 2023 re: Notice of Commencement of Operations and Work as Executed Plans.</p> <p>Correspondence from NSW DPE to LSbp dated 18 April 2023, re: Notification of Commencement of Operation and Work as Executed Plans. The department noted that the work as executed plan submitted did not show a comparison to the approved final layout plans. NSW DPE requested that plans be resubmitted.</p> <p>Correspondence from LSbp to NSW DPE dated 26 May 2023 via Major Projects Portal showing Works as Executed Plan submitted as an overlay with the Final Layout Plan to show comparison between as built vs pre-construction layout.</p> <p>Correspondence from NSW DPE to LSbp dated 13 June 2023, re: Work as Executed Plan – Comparison – More Information Required. The Department noted that the work as executed plans submitted did not show a comparison to the approved final layout plans. NSW DPE requested that plans be resubmitted.</p> <p>Correspondence from NSW DPE to LSbp dated 01 August 2023, re: Works as Executed Plan. The Department noted that it has no further comments on the document at this time.</p>	<p>LSbp notified the Planning Department one day prior to the commencement of operations. A Work as Executed plan was provided however this did not meet the requirements of this condition and was required to be resubmitted.</p> <p>LBSP subsequently submitted a Works as Executed Plan as an overlay with the Final Layout Plan to show comparison between as built vs pre-construction layout on two separate occasions until endorsed by the Department.</p> <p>LSbp were non-compliant with the original requirements for this condition, however have adequately addressed the non-compliance to the satisfaction of the Department and on that basis are considered compliant with the requirements of this condition.</p>	C
S2.8	<p><b>Notification of Department</b> Prior to commencing the construction, operations, upgrading or decommissioning of the development of the cessation of operations, the Applicant must notify the Department in writing <a href="#">via the Major Projects website</a> of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be</p>	<p><b>Construction:</b> Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operation:</b> Correspondence from LSbp to NSW DPE, dated 14 April 2023 re: Notice of Commencement of Operations and Work as Executed Plans.</p>	<p>The Proponent notified the Department in writing 1 day prior to commencing operations.</p> <p>Note: Upgrading or decommissioning works have not been undertaken at the time of this audit. As such, the requirements relating to these phases have not yet been triggered.</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	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.	Document lodgement receipt from NSW DPE dated 14 April 2023, for Notice of Operations and Work as Executed Plans.		
S2.9	<p><b>Structural adequacy</b></p> <p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>- Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</li> <li>- Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operations:</b></p> <p>Certificate of Completion (issued under the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005), issued to PCL, dated 21 March 2023, Re: Installation of a modular Operations and Maintenance Building.</p>	A Certificate of Completion was obtained from Bland Shire Council for the Operations and Maintenance Building.	C
S2.10	<p><b>Demolition</b></p> <p>The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i>, or its latest version.</p>	Site observations and discussion with PCL Construction Manager. Site Inspection observations 18 – 19 July 2023.	No demolition to date on site. The requirement of this condition has not yet been triggered.	NT
S2.11	<p><b>Protection of public infrastructure</b></p> <p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ol style="list-style-type: none"> <li>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</li> <li>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</li> </ol> <p>The condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	Discussions with PCL Construction Manager. Site Inspection observations 18 – 19 July 2023.	The PCL Construction Manager reported that no public infrastructure has been damaged or required to be relocated at the time of this audit. As such the requirement of this condition has not yet been triggered.	NT

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S2.12	<p><b>Operation of plant and equipment</b> The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner.</li> </ul>	<p><b>Construction:</b> Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021. PCL Plant Register.  PCL Incident register.  LSbp Feedback Register.</p> <p><b>Operations:</b>  Light vehicles only. No plant on site.  Ventia Plant and Equipment SHEQ Register.  Site Inspection observations 18 – 19 July 2023.</p>	<p>With the exception of light vehicles, there was no plant and equipment on site at the time of the operational IEA. A plant register was updated and maintained during the construction period to address the auditor recommendations made during the Construction IEA.</p> <p>Light vehicles on site appeared well maintained and were operated in a proper and efficient manner. The two light vehicles and one box trailer were recorded on the Plant and Equipment Register.</p>	C
S2.13	<p><b>SUBDIVISION</b> The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in Appendix 6 and in accordance with the requirements of the EP&amp;A Act and the <i>Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021</i>. <i>Notes:</i></p> <ul style="list-style-type: none"> <li>• Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision.</li> <li>• Division 6.4 of Part 6 of the EP&amp;A Act sets out the application requirements for subdivision certificates.</li> </ul>	Discussion with LSbp Development Manager.	<p>The subdivision of the site relates to the substation, which is in the process of being subdivided into two titles.</p> <p>Essential Energy own and manage the 132kV portion, whilst LSbp lease the 33kv input portion of the substation.</p>	NT
Schedule 3 S3.1	<p><b>ENVIRONMENTAL CONDITIONS – GENERAL</b> <b>Over-dimensional and heavy vehicle restrictions</b> The Applicant must ensure that the:</p> <ul style="list-style-type: none"> <li>(a) development does not generate more than: <ul style="list-style-type: none"> <li>- 25 heavy vehicle movements a day during construction, upgrading or decommissioning;</li> </ul> </li> </ul>	<p><b>Construction:</b> Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.  Correspondence between LSbp and TfNSW, dated between 23 December 2020 and 19 January 2021 regarding approval of request to increase the</p>	<p><b>Construction:</b> PCL site security team maintained a Truck Movements Register throughout the construction period. This register indicates compliance with the revised requirements of this condition as agreed by NSW DPE.</p>	C

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	<p>- 1 over-dimensional vehicle movements during construction, upgrading and decommissioning; and</p> <p>- 1 heavy vehicle movement a day during operations;</p> <p>on the public road network; and</p> <p>(b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the <a href="#">Planning Secretary</a> agrees otherwise.</p>	<p>maximum number of heavy vehicles permitted to access the site in any day from 25 trucks (50 movements) to 50 trucks (100 movements).</p> <p>Correspondence between LSbp and Bland Shire Council, dated between 16 December 2020 and 13 January 2021 regarding approval of request to increase the maximum number of heavy vehicles permitted to access the site in any day from 25 trucks (50 movements) to 50 trucks (100 movements).</p> <p>Correspondence from LSbp to NSW DPIE RE: West Wyalong Solar Farm (SSD9504) – Request to Vary Condition 1, dated 19 January 2021.</p> <p>Correspondence from NSW DPIE to LSbp, dated 24 February 2021, approving the increase in heavy vehicles from 25 to 50 movements per day.</p> <p>PCL Truck Movement Register.</p> <p><b>Operations:</b></p> <p>Discussion with Ventia Site Manager</p>	<p>The PCL Construction Manager reported the length of vehicles did not exceed the 26m requirement of this condition.</p> <p><b>Operations:</b></p> <p>No truck movements to date. Ventia are in the process of establishing a method to record truck movements and details in order to manage compliance with the requirements of this condition.</p> <p><i>Note: As per the approved Traffic Management Plan, a vehicle movement is considered to be one vehicle entering and leaving the site.</i></p>	
3.2	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.	Refer to evidence collected under S3.1.	<p><b>Construction:</b></p> <p>PCL site security team maintained a Truck Movements Register throughout the construction period.</p> <p><b>Operations:</b></p> <p>No truck movements to date. Ventia are in the process of establishing a method to record truck movements and details in order to manage compliance with the requirements of this condition.</p>	C
S3.3	<p><b>Access routes</b></p> <p>All heavy vehicles <b>up to a maximum of 19 metres in length</b> associated with the development must travel to and from the site via the:</p>	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p>	The designated and approved transport route is outlined in Section 5 of the approved Traffic Management Plan, including Figure 3: Updated vehicle	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>(a) Newell Highway (northeast), Bodells Lane and Blands Lane; or</p> <p>(b) West Wyalong Heavy Vehicle Bypass, the Newell Highway (southwest), Bodells Lane and Blands Lane; and the approved site access point on Blands Lane, as identified in the figure in Appendix 4.</p> <p>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</p>	<p>Discussion with PCL Construction Manager.</p> <p>Traffic Management Plan, prepared by pitt&amp;sherry, Rev 04, dated 05 September 2021.</p> <p>Correspondence from NSW DPE dated 20 December 2021 Re: Traffic Management Plan, endorsing the revised Traffic Management Plan (Revision 5, dated 16 December 2021).</p> <p>LSbp Feedback Register.</p> <p><b>Heavy Vehicle permit for the over-dimensional load (Transformer).</b></p> <p>Overdimensional Lift &amp; Shift Pty Ltd documentation including:</p> <ul style="list-style-type: none"> <li>- Site Safety Pack West Wyalong Solar Farm, Version 1, dated 19 April 2022.</li> <li>- National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption, issued to O.D. Transport Pty Ltd, dated 29 October 2021 for period between 01 November 2021 and 30 October 2022. Permit No. 273557V5. Covers travel of transformer from Wilson Transformers (310-336 Springvale Rd, Glen Waverly Victoria to VIC/NSW border, Hume Fwy, Wodonga Vic.</li> <li>- National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption, issued to O.D. Transport Pty Ltd, dated 07 April 2022 for period between 02 May 2022 and 01 August 2022. Permit No. 599935V2. Covers travel of transformer from VIC/NSW border, Hume Fwy, South Albury NSW to Blands Lane, Wyalong NSW (the Solar Farm).</li> </ul> <p><b>Self-Reported Non-Compliance</b></p> <p>Automated reply from Major Project Portal re: Notification of non-compliance with approved transport route – service level agreement, dated 19 January 2022.</p> <p>Correspondence from NSW DPE, dated 21 January 2022, Re: Non-compliance with approved transport route. This includes request for evidence to address additional requirements.</p> <p>Correspondence from LSbp to NSW DPE, dated 28 January 2022, Re; RFI Response - Non-compliance with approved transport route.</p>	<p>access routes. This appears to have been complied with during construction with the exception of one self-reported non-compliance outside of the control of the project.</p> <p>National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption permits were obtained for the transport of the transformer to site.</p> <p>LSbp self-reported a non-compliance with Condition 3 and 3A, Schedule 3 due to a temporary change to the heavy vehicle access route following significant rainfall events and localised flooding.</p> <p>NSW DPE acknowledged this non-compliance and noted the following:</p> <p><i>“The Department has reviewed the notification and notes that the Project will temporarily be in non-compliance with the approved heavy vehicle access routes set out in Conditions 3 and 3A, Schedule 3, in the Consent. The Department also notes that this non-compliance is out of the control of the Project and is a result of recent significant rain events in the area which has caused Bland Shire Council (BSC) to close all unsealed roads to vehicles that exceed three tonnes. As an interim measure, BSC have authorised heavy vehicles associated with the Project to use Clear Ridge Road and the western portion of Blands Lane”.</i></p>	

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		<p><b>Operations:</b></p> <p>Discussion with Ventia Site Manager.</p>	<p>NSW DPE issued a Request for Further Information (RFI) which was responded to by LSbp within the stipulated timeframe.</p> <p>Overall the requirements of this condition are assessed as compliant as the self-reported non-compliance was out of the control of the project and the interim measures were managed and authorised by Bland Shire Council.</p> <p><b>Operations:</b></p> <p>No heavy vehicles to date during operations. Traffic Management Plan remains in place and is understood by Ventia site team.</p>	
<b>S3.3A</b>	All heavy vehicles greater than 19 metres in length and over-dimensional vehicles associated with the development must travel to and from the site via the Newell Highway (northeast), Bodells Lane and Blands Lane and the approved site access point on Blands Lane, as identified in the figure in Appendix 4	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Self-Reported Non-Compliance</b></p> <p>Refer to evidence and findings recorded under S3.3 above.</p> <p><b>Heavy Vehicle permit for the over-dimensional load (Transformer).</b></p> <p>Overdimensional Lift &amp; Shift Pty Ltd documentation including:</p> <ul style="list-style-type: none"> <li>- Site Safety Pack West Wyalong Solar Farm, Version 1, dated 19 April 2022.</li> <li>- National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption, issued to O.D. Transport Pty Ltd, dated 29 October 2021 for period between 01 November 2021 and 30 October 2022. Permit No. 273557V5. Covers travel of transformer from Wilson Transformers (310-336 Springvale Rd, Glen Waverly Victoria to VIC/NSW border, Hume Fwy, Wodonga Vic.</li> <li>- National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption, issued to O.D. Transport Pty Ltd, dated 07 April 2022 for period between 02 May 2022</li> </ul>	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Self-Reported Non-Compliance</b></p> <p>Refer to evidence and findings recorded under S3.3 above.</p> <p>National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption permits were obtained for the transport of the transformer to site.</p> <p><b>Operations:</b></p> <p>No heavy vehicles to date during operations. Traffic Management Plan remains in place and is understood by Ventia site team.</p>	C

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		<p>and 01 August 2022. Permit No. 599935V2. Covers travel of transformer from VIC/NSW border, Hume Fwy, South Albury NSW to Blands Lane, Wyalong NSW (the Solar Farm).</p> <p><b>Operations:</b></p> <p>Discussion with Ventia Site Manager.</p>		
S3.4	All light vehicles and shuttle buses associated with the development must travel to and from the site via the Newell Highway, Clear Ridge Road, Blands Lane and the approved site access point on Blands Lane, as identified in the figure in Appendix 4.	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>LSbp Feedback register.</p> <p>No complaints. No incidents.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	<p>The Traffic Management Plan remains in place and has been communicated to the operational team. All light vehicles observed during the audit were seen entering and exiting the site via the approved access routes.</p> <p>No complaints have been recorded in relation to the requirements of this condition. A shuttle bus operated between site and Temora / West Wyalong during construction.</p>	C
S3.5	<p><b>Road upgrades and site access</b></p> <p>Prior to commencing construction, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) upgrade the intersection of the Newell Highway and Bodells Lane, including a Basic Left Turn (BAL) treatment to cater for the largest vehicle accessing the site;</li> <li>(b) seal Bodells Lane for a minimum of 50 m from its intersection with the Newell Highway, to a standard that allows two-way heavy vehicle movements;</li> <li>(c) upgrade Blands Lane between Bodells Lane and Clear Ridge Road, including grading, with an all-weather seal to be applied on Blands Lane between the site access point and Bodells Lane;</li> </ul>	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operations:</b></p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL Construction Manager.</p> <p>Traffic Management Plan, prepared by pitt&amp;sherry, Rev 04, dated 05 September 2021.</p> <p>Traffic Management Plan, prepared by pitt&amp;sherry, Rev 05, dated 16 December 2021.</p>	<p>Requirements (a), (b) and (d) were assessed as compliant in the Construction IEA.</p> <p>Permanent line-marking and signage has been installed at the intersection of the Newell Highway and Bodells Lane.</p> <p><b>CoC OFI #1</b></p> <p>As assessed in the Construction IEA, the upgrade of Blands Lane and Bodells Lane was not completed prior to commencement of construction and this remains ongoing at the time of this Operational IEA. The auditor acknowledged that Bland Shire Council</p>	C (with OFI)

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>(d) design the site access point off Blands Lane (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site. These upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.</p>	<p>Correspondence from NSW DPE dated 20 December 2021 Re: Traffic Management Plan, endorsing the revised Traffic Management Plan (Revision 5, dated 16 December 2021).</p> <p>Correspondence between PCL and Bland Shire Council, dated between 29 June 2023 and 17 July 2023 re: Blands Lane and Bodells Lane Inspection (and outstanding items to complete construction and upgrading of Bland Lane and Bodells Lane).</p>	<p>and TfNSW were all aware of the delays due to wet weather and flood damage.</p> <p><b>Auditor Recommendation:</b></p> <p>PCL to continue to work with Bland Shire Council to finalise the road upgrades as required under this condition, and as per agreed arrangements under the approved Traffic Management Plan (Rev 5, dated 16 December 2021).</p>	
S3.6	<p><b>Operating Conditions</b> The Applicant must ensure:</p> <ul style="list-style-type: none"> <li>(a) the internal project site roadways are constructed as all-weather roadways;</li> <li>(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;</li> <li>(c) the capacity of the existing roadside drainage network is not reduced;</li> <li>(d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</li> <li>(e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.</li> </ul>	<p><b>Construction:</b></p> <p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operations:</b></p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Correspondence between PCL and Bland Shire Council, dated between 29 June 2023 and 17 July 2023 re: Blands Lane and Bodells Lane Inspection (and outstanding items to complete construction and upgrading of Bland Lane and Bodells Lane).</p>	<p><b>Operations:</b></p> <p>The following observations were made during the audit site inspection:</p> <ul style="list-style-type: none"> <li>a) Parking and laydown areas are established on site. There was no evidence of workers parking on public roads within the vicinity of the project.</li> <li>b) From visual observations it does not appear that the capacity of existing roadside drainage network has been reduced. Works are currently underway to improve road width and drainage.</li> <li>c) Laydown areas are established for turn in / turn-out.</li> <li>d) From visual observations vehicles leaving site are generally clean and there was no visible dirt/mud being tracked onto the public road network. Site access is with all-weather roads, sealed access road and sealed hardstand to minimise any dirt being tracked from site.</li> </ul>	C



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S3.7	<p><b>Traffic management plan</b> Prior to commencing the road upgrades required by condition 5 of Schedule 3 of this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> <li>(a) details of the transport route to be used for all development-related traffic;</li> <li>(b) a protocol for undertaking independent dilapidation surveys to assess the: <ul style="list-style-type: none"> <li>• existing condition of Bodells Lane and Blands Lane prior to construction, upgrading or decommissioning activities; and</li> <li>• condition of Bodells Lane and Blands Lane following construction, upgrading or decommissioning activities;</li> </ul> </li> <li>(c) a protocol for the repair of Bodells Lane and Blands Lane if dilapidation surveys identify these roads to be damaged during construction, upgrading or decommissioning works;</li> <li>(d) details of the road upgrade works required by condition 5 of Schedule 3 of this consent;</li> <li>(e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> <li>• temporary traffic controls, including detours and signage;</li> <li>• notifying the local community about project-related traffic impacts;</li> </ul> </li> </ul>	<p><b>Construction:</b> Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operations:</b> Site Inspection observations 18 – 19 July 2023.</p> <p>Correspondence between PCL and Bland Shire Council, dated between 29 June 2023 and 17 July 2023 re: Blands Lane and Bodells Lane Inspection (and outstanding items to complete construction and upgrading of Bland Lane and Bodells Lane).</p> <p>Traffic Management Plan, prepared by pitt&amp;sherry, Rev 04, dated 05 September 2021.</p> <p>Correspondence from NSW DPE dated 20 December 2021 Re: Traffic Management Plan, endorsing the revised Traffic Management Plan (Revision 5, dated 16 December 2021).</p> <p>Discussions with PCL Construction Manager.</p> <p>Dilapidation Report prepared by ANKN Engineering Consultants Pty Ltd, dated 28/08/2021.</p>	<p>Approval of the traffic management plan was assessed as compliant in the Construction IEA.</p> <p>The Traffic Management Plan (Rev 4) was revised and endorsed by NSW DPE shortly after completion of the Construction IEA. This included a Driver's Code of Conduct with references the designated light and heavy vehicle transport routes.</p> <p>National Heavy Vehicle Regulator – Oversize and/or Overmass (OSOM) Mass or Dimension Exemption permits were obtained for the transport of the transformer to site.</p> <p>It is noted that PCL and Bland Shire Council continue to be in discussions with regard to outstanding items to complete construction and upgrading of Bland Lane and Bodells Lane.</p> <p>The PCL Construction Manager reported that, with exception of the self-reported non-compliance (Refer to S3.3 and S3.3A) all works were completed within the requirements of the TMP. On the basis that no additional complaints were reported, since the Construction IEA, the project is considered to comply with the implementation requirements of the plan.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• procedures for receiving and addressing complaints from the community about development-related traffic;</li> <li>• minimising potential for conflict with school buses and other motorists as far as practicable;</li> <li>• minimising dirt tracked onto the public road network from development-related traffic;</li> <li>• dust management along Bodells Lane and Blands Lane, including:                             <ul style="list-style-type: none"> <li>- application of a dust suppressant;</li> <li>and</li> <li>- a 50 km per hour speed limit for development related heavy vehicles using Bodells Lane and Blands Lane;</li> </ul> </li> <li>• details of the employee shuttle bus service and measures to ensure employee use of this service;</li> <li>• scheduling of haulage vehicle movements to minimise convoy length or platoons;</li> <li>• responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;</li> <li>• responding to any emergency repair or maintenance requirements; and</li> <li>• a traffic management system for managing over-dimensional vehicles;</li> </ul> <p>(f) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> <li>• travelling speeds;</li> <li>• driver fatigue;</li> <li>• procedures to ensure that drivers adhere to the designated transport routes and speed limits; and</li> <li>• procedures to ensure that drivers implement safe driving practices;</li> </ul>			

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>(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; and</p> <p>(h) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.</p> <p>Following the <a href="#">Planning Secretary's</a> approval, the Applicant must implement the Traffic Management Plan</p>			
S3.8	<p><b>Landscaping Vegetation Buffer</b></p> <p>The Applicant must establish and maintain a mature vegetation buffer and infill planting (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the <a href="#">Planning Secretary</a>. This vegetation buffer must:</p> <ul style="list-style-type: none"> <li>(a) be planted prior to commencing operations;</li> <li>(b) be comprised of species that are endemic to the area;</li> <li>(c) be established within 3 years of commencing operations; and</li> <li>(d) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise.</li> </ul>	<p>Landscape Plan, Rev H, dated 25 August 2020, prepared by Terras Landscape Architects.</p> <p>Correspondence from NSW DPIE, dated 02/02/2022, Re: Vegetation buffer commencement. The Planning Secretary granted an extension of time to plant the vegetation buffer until 30 November 2022. LSbp to ensure it sources appropriate species in preparation for planting prior to 30 November 2022.</p> <p>Correspondence from LSbp to NSW DPE, dated 27 May 2022, RE: Vegetation Buffer (request to delay planting to Autumn 2023 (April/May 2023)).</p> <p>Correspondence from NSW DPIE, un-dated (LSbp identifies this as 14 September 2022), Re: Commencement of vegetation buffer. The Planning Secretary granted a second extension of time to defer plating of the vegetation buffer from 30 November 2022 until Autumn 2023. LSbp to ensure it sources appropriate species in preparation for planting prior to 30 November 2022.</p> <p>Tree Plant reports issued by Hunter Land Management Pty Ltd dated between 09 and 25 May 2023:</p> <p>Correspondence from Hunter Land Management Pty Ltd (HLM), dated 11 April 2023, re: Landscaping (delay planting until April/May 2023).</p>	<p>HML Pty Ltd were engaged by PCL and undertook vegetation buffer planting early May 2023 in all locations as outlined in the Landscape Plan, including new buffer plantings along the northern boundary and infill buffer plantings along the Southern and Eastern boundaries. The plantings were planted in accordance with agreed arrangements.</p> <p>The auditor notes that continued maintenance and weed management action is to be undertaken to address the requirements of this condition as per planned arrangements within the Landscaping Plan to ensure the vegetation buffer is matured and established within 3 years of commencing operations.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S3.9	<p><b>Landscaping plan</b>                      Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development to the satisfaction of the <a href="#">Planning Secretary</a>. This plan must include:</p> <ul style="list-style-type: none"> <li>(a) a description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 8 (a) – (d) above;</li> <li>(b) a program to monitor and report on the effectiveness of these measures; and</li> <li>(c) details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for the completion of actions.</li> </ul> <p>Following the <a href="#">Planning Secretary</a>'s approval, the Applicant must implement the Landscaping Plan.</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia NSW Operations Manager – Electricity &amp; Gas   Infrastructure Services.</p>	<p>A Landscaping Plan was prepared and approved almost one year prior to commencement of construction and remains unchanged since the Construction IEA.</p> <p>HML Pty Ltd were engaged by PCL and undertook vegetation buffer planting early May 2023 in all locations as outlined in the Landscape Plan, including new buffer plantings along the northern boundary and infill buffer plantings along the Southern and Eastern boundaries.</p> <p>No issues or opportunities for improvement were identified by the auditor during the Operational IEA. Ventia, as initial Operations Managers, are aware of their responsibilities under the Landscaping Plan.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S3.10	<p><b>Land management</b> The Applicant must maintain the agricultural land capability of the site, including:</p> <ul style="list-style-type: none"> <li>(a) establishing the ground cover of the site within 3 months following any construction or upgrading;</li> <li>(b) properly maintaining the ground cover with appropriate perennial species and weed management; and</li> <li>(c) maintaining grazing within the development footprint, where practicable, unless the <a href="#">Planning Secretary</a> agrees otherwise.</li> </ul>	<p>West Wyalong Solar Farm Landscape Plan, Revision H, dated 25 August 2020.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia NSW Operations Manager – Electricity &amp; Gas   Infrastructure Services.</p> <p>Discussion with LSbp Associate Asset Manager.</p>	<p>The Landscape Plan includes a Vegetation Management Program.</p> <ul style="list-style-type: none"> <li>a) Groundcover has been effectively re-established across the site following construction. The auditor notes that the area associated with the former construction compound still requires final rehabilitation.</li> <li>b) Ground cover is appears appropriate and similar to surrounding areas. Weeds are present on site. The Construction Manager reported that weed spraying was unable to be undertaken during the construction period due to persistent wet weather and standing water on site. Weed spraying was undertaken across the site prior to operations commencing, the effect of which was visible, with weed die-back observed during the audit site inspection.</li> </ul>	C (with OFI)

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			<p>c) Currently no grazing on the development footprint. LSPB and Ventia confirmed sheep grazing is being investigated as a long-term land management action.</p> <p><b>CoC OFI #2:</b></p> <p><b>Auditor Recommendation:</b></p> <p>Whilst only recently demobilised and not longer than 3 months ago, the area that the former construction compound occupied requires rehabilitation in accordance with the requirements of this condition.</p>	
S3.11	<p><b>Biodiversity Vegetation Clearance</b></p> <p>The Applicant must minimise the clearing of native vegetation and fauna habitat located within the Myers Lane road reserve through detailed design of the transmission line.</p>	<p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with LSbp Associate Asset Manager.</p> <p>Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.</p>	<p>The PCL EPC Site Manager reported that Myers Lane Road Reserve was cleared in accordance with the Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines, as per the Biodiversity Management Plan. Vegetation beyond Myers Lane, but within the specified clearing zone, was able to be maintained (clearing minimised).</p>	C
S3.12	<p><b>Biodiversity offsets</b></p> <p>Within two years of commencing development under this consent, the Applicant must retire biodiversity credits of a number and class specified in Table 1 of the Consent Conditions to the satisfaction of BCS, unless the <a href="#">Planning Secretary</a> agrees otherwise.</p> <p>The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Policy for Major Projects</i> and can be achieved by:</p>	<p>Correspondence from NSW Biodiversity Conservation Trust, dated 03 April 2023, Statement confirming payment into the Biodiversity Conservation fund for an offset obligation (PCT177 – 13 Credits).</p> <p>Correspondence from NSW Biodiversity Conservation Trust, dated 15 September 2022, Statement confirming payment into the Biodiversity Conservation fund for an offset obligation (PCT 26 – 5 Credits / PCT 76 – 2 Credits).</p> <p>Correspondence from NSW Office of Environment and Heritage (OEH), dated 09 November 2022, RE: RETIRE40 - West Wyalong Fund Pty Ltd as</p>	<p>Biodiversity offsets credits were finalised within 2 years of the development commencing as required by the requirements of this condition.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status															
	<p>(a) acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>;</p> <p>(b) making payments into an offset fund that has been developed by the NSW Government; or</p> <p>(c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</p> <p>Table 1: Ecosystem Credit Requirements</p> <table border="1" data-bbox="277 619 797 1145"> <thead> <tr> <th data-bbox="277 619 645 683"><b>Vegetation Community</b></th> <th data-bbox="645 619 689 683"><b>PCT ID</b></th> <th data-bbox="689 619 797 683"><b>Credits Required</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="277 683 645 778">Weeping Myall open woodland of the Riverina Bioregion and NSW South Western Slopes Bioregion</td> <td data-bbox="645 683 689 778">26</td> <td data-bbox="689 683 797 778">5</td> </tr> <tr> <td data-bbox="277 778 645 900">Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions</td> <td data-bbox="645 778 689 900">55</td> <td data-bbox="689 778 797 900">41</td> </tr> <tr> <td data-bbox="277 900 645 1021">Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions</td> <td data-bbox="645 900 689 1021">76</td> <td data-bbox="689 900 797 1021">2</td> </tr> <tr> <td data-bbox="277 1021 645 1145">Blue Mallee - Bull Mallee - Green Mallee very tall mallee shrubland of the West Wyalong region, NSW South Western Slopes Bioregion</td> <td data-bbox="645 1021 689 1145">177</td> <td data-bbox="689 1021 797 1145">13</td> </tr> </tbody> </table>	<b>Vegetation Community</b>	<b>PCT ID</b>	<b>Credits Required</b>	Weeping Myall open woodland of the Riverina Bioregion and NSW South Western Slopes Bioregion	26	5	Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions	55	41	Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions	76	2	Blue Mallee - Bull Mallee - Green Mallee very tall mallee shrubland of the West Wyalong region, NSW South Western Slopes Bioregion	177	13	trustee for the West Wyalong Trust - biodiversity credit retirement approved (PCT 55 – 41 Credits).		
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S3.13	<p><b>Biodiversity management plan</b> Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> <li>• managing the remnant vegetation and fauna habitat on site;</li> <li>• protecting vegetation and fauna habitat outside the approved disturbance areas;</li> <li>• minimising the clearing of native vegetation and fauna habitat within the Myers Lane road reserve;</li> <li>• minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</li> <li>• minimising the impacts to fauna on site and implementing fauna management protocols;</li> <li>• avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna;</li> <li>• rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area;</li> <li>• maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and</li> <li>• controlling weeds and feral pests;</li> </ul> <p>(b) include a fauna monitoring and management protocol, including</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Correspondence from Department to Proponent, dated 21 December 2020, approving the BMP (V3).</p> <p>Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.</p> <p>Sample of weekly environmental site inspections and specific inspection records of:</p> <ul style="list-style-type: none"> <li>- No Go Zones 06 October 2022</li> <li>- Habitat Boxes 05 December 2022, 18 February 2023 and 09 May 2023.</li> <li>- Reuse of course woody debris 08 March 2023</li> <li>- Perimeter fence inspection 23 April 2023</li> </ul> <p>Nutrien Ag Solutions – Broadleaf weed recommendations for West Wyalong Solar Farm, dated 03 September 2021.</p> <p>Herbicide application records, prepared by Nigel Duncan, dated between 04 April and 22 May 2023</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p> <p>Spraygrass Pty Ltd report dated 02 June 2023 Re: Materials used at West Wyalong Solar Farm (as part of hydromulching works, totally 17,000m<sup>2</sup>).</p>	<p>The approved Biodiversity Management Plan remains in place and has been implemented throughout construction and into the operational phase of the project.</p> <p>No go zones, established during the construction phase with permanent stock fencing and signage, remain in place and there is no evidence that these have been breached by construction or operational processes.</p> <p>The majority of clearing was undertaken prior to the construction audit. A pre-clearance survey was undertaken for Myers Lane and an ecologist was present as a spotter during clearing works. One habitat tree was maintained, reflecting the effort to minimise clearing where possible.</p> <p>Groundcover rehabilitation has occurred across the site, including hydro mulching works.</p> <p>Habitat boxes remain in place and have been checked throughout both construction and operational phases.</p> <p>No issues were observed in relation to feral pests, sediment and erosion control, dust control or rehabilitation.</p> <p>PCL Environmental Inspection Checklist includes inspection of no-go zones, project boundaries, perimeter fencing and weed management issues.</p>	C (with OFI)



COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>identification and reporting of fauna mortalities to BCS; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement</p>		<p>Overall improvement was achieved with the implementation of the BMP since the Construction IEA.</p> <p><b>CoC OFI #3</b></p> <p><b>Auditor Recommendation:</b> Whilst nest boxes have been inspected for damages throughout the construction and operation phases to date, these inspections have not included monitoring observations and reporting to identify occupancy rates of nest boxes, as specified in Table 4-2 – Operations of the BMP (due in late winter and mid-summer for the first three years of operation).</p> <p><b>CoC OFI #4</b></p> <p><b>Auditor Recommendation:</b> ChemCert accreditation for Nigel Duncan is due to be renewed as the copy maintained on file expired on 21 March 2023.</p>	

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
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S3.14	<p><b>Amenity</b>  <b>Construction, upgrading and decommissioning hours</b>  Unless the <a href="#">Planning Secretary</a> agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <ul style="list-style-type: none"> <li>(a) 7am to 6pm Monday to Friday;</li> <li>(b) 8am to 1pm Saturdays; and</li> <li>(c) at no time on Sundays and NSW public holidays.</li> </ul> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the <a href="#">Planning Secretary</a>:</p> <ul style="list-style-type: none"> <li>• activities that are inaudible at non-associated receivers;</li> <li>• the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or</li> <li>• emergency work to avoid the loss of life, property and/or material harm to the environment.</li> </ul>	<p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with LSbp Associate Asset Manager.</p> <p>Project Feedback Register.</p>	<p>It was reported that all work were undertaken within the designated construction hours. No noise / work hour related complaints within the audit period.</p> <p>There are operational time restrictions. No upgrading or decommissioning works on site to date.</p>	C
S3.15	<p><b>Noise</b>  The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on the site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.</p>	<p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with LSbp Associate Asset Manager.</p> <p>Project Feedback Register.</p> <p>West Wyalong Solar Farm Noise Impact Assessment, Rev 1 dated 30 November 2018 prepared by SLR Consulting Australia Pty Ltd</p> <p>Complaints Register - No noise complaints.</p>	<p>It was reported that all work were undertaken within the designated construction hours. No noise / work hour related complaints within the audit period. No upgrading or decommissioning works on site to date.</p> <p>On the basis that no complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
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S3.16	<p><b>Dust</b> The Applicant must minimise the dust generated by the development.</p>	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia NSW Operations Manager – Electricity &amp; Gas   Infrastructure Services.</p> <p>LSbp Feedback Register – no dust related complaints.</p>	<p>It was reported that a water cart was maintained during construction, however had minimal use due to persistent wet weather.</p> <p>On the basis that no dust related complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.</p> <p>No dust related issues were observed during the audit site inspection and minimal dust is anticipated to be generated during operational activities.</p>	C
S3.17	<p><b>Visual</b> The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels;</li> <li>(b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</li> <li>(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with Ventia NSW Operations Manager – Electricity &amp; Gas   Infrastructure Services.</p> <p>LSbp Feedback Register – no dust related complaints.</p>	<ul style="list-style-type: none"> <li>(a) Glare is not typically associated with solar panels.</li> <li>(b) Ancillary infrastructure is green in colour.</li> <li>(c) No advertising signs were observed displayed at the time of the audit.</li> <li>(d) On the basis of the above and that no ‘visual’ complaints have been reported or received, the project is generally considered compliant with the requirements of this condition at the time of the audit.</li> </ul>	C
S3.18	<p><b>Lighting</b> The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) minimise the off-site lighting impacts of the development; and</li> <li>(b) ensure that all external lighting associated with the development:</li> </ul>	<p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p> <p>LSbp Feedback Register – no lighting related complaints.</p>	<p>The PCL Site Manager and Ventia Site Manager reported that only safety specific lighting installed.</p> <p>On the basis that no lighting related complaints have been reported or received, the project is generally</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>does not shine above the horizontal; and</li> <li>complies with <i>Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i> or its latest version.</li> </ul>		considered complaint with the requirements of this condition.	
S3.19	<p><b>Heritage Protection of heritage items</b></p> <p>The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or located outside the approved development footprint.</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>WWSF - Heritage Management Plan, Version 12 dated 28 June 2022, prepared by Artefact Heritage Pty Ltd.</p> <p>Correspondence from NSW DPIE to LSbp, dated 15 July 2022, re: approval of Heritage Management Plan, Version 12, June 20220 (as updated following bee tree incident and enforceable undertaking).</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with LSbp Development Manager.</p> <p><b>Bee Tree incident / Self report non-compliance assessed during Construction IEA – Follow up:</b></p> <p>Correspondence from LSbp to NSW DPE, dated 06 October 2021, re: Response to Show Cause Letter.</p> <p>Correspondence from NSW DPIE to LSbp, dated 21 September 202, re: West Wyalong Solar Farm (SSD 9504).</p> <p>Correspondence from PCL to NSW DPE (executed 03 June 2022) re: Enforceable Undertaking by PCL to NSW DPE for the purposes of Section 9.5 of the Environmental Planning and Assessment Act 1979 (NSW).</p>	<p>As assessed in the Construction IEA, the proponent self-reported a non-compliance with the requirements of this condition to the Department and other relevant agencies and stakeholders. At the time of the Construction IEA the NSW DPE was still investigating the non-compliance.</p> <p>This operational IEA assesses the outcome of the non-compliance below. There were no reports of unexpected finds during construction or operations to date. No go zones, including around Aboriginal heritage sites, remain established and were observed during the operational site inspection.</p> <p><b>Bee Tree Enforceable Undertaking:</b></p> <p>NSW DPE investigated the potential non-compliance with SSD 9504 Schedule 3, Condition 13 and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with the auditor and confirmed there are no outstanding requirements. Outcomes of the Enforceable Undertaking were also</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
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		<p>Correspondence from Artefact Heritage Services Pty Ltd (Artefact Heritage), dated 20 April 2023, Re: West Wyalong Solar Farm – Enforceable Undertaking Audit.</p> <p>Discussion with NSW DPE Planning Compliance (Michael Wood).</p> <p>Discussion and correspondence with Wendy Illingworth NSW DPE – Compliance and Regulation Officer – Biodiversity and Conservation   South West, dated 11 July 2023.</p> <p>Correspondence from NSW DPIE to LSbp, dated 15 July 2022, re: approval of Heritage Management Plan, Version 12, June 20220 (as updated following bee tree incident and enforceable undertaking).</p>	<p>audited by Artefact Heritage Pty Ltd and found that all terms of the Enforceable Undertaking were met. The salvaged Bee Tree was observed undercover of the veranda of the West Wyalong Local Aboriginal Land Council.</p> <p>On the basis that no further non-compliance has been identified within this audit period and that the Enforceable Undertaking is considered closed, the is generally considered complaint with the requirements of this condition.</p>	
<b>S3.19A</b>	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted and obtain a Care Agreement for the transfer and safekeeping of artefacts to the West Wyalong Local Aboriginal Land Council.</p> <p>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Correspondence from Artefact Heritage Pty Ltd, dated 06 September 2021, Memo Report RE: Site visit to WWSF 30 – 31 August 2021.</p> <p>Care Agreement 4658, West Wyalong Solar Farm Aboriginal Objects Care Agreement (DOC20/857864), dated 19 October 2020.</p>	<p>Aboriginal heritage items were salvaged and relocated prior to construction. NSW DPE investigated the potential non-compliance including disturbance to AHIMS ID 43-4-0057 being an artefact scatter located within the site of the bee tree. Actions to address this are reported within the Enforceable Undertaking are considered closed (refer to S3.19). As such this condition is considered not triggered under the Operational Phase of the project.</p> <p>Heritage NSW transferred the Aboriginal objects to West Wyalong Local Aboriginal Land Council pursuant to s85A(1)(c) of the NPW Act, under a Care Agreement which includes a number of conditions.</p>	C

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S3.20	<p><b>Heritage Management Plan</b> Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the <a href="#">Planning Secretary</a>. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the <a href="#">Planning Secretary</a>;</p> <p>(b) be prepared in consultation with <a href="#">Heritage NSW</a> and Aboriginal Stakeholders;</p> <p>(c) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> <li>• protecting the Aboriginal heritage items identified in Table 1 of Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction;</li> <li>• salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 3;</li> <li>• a contingency plan and reporting procedure if: <ul style="list-style-type: none"> <li>- previously unidentified heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> <li>- 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</li> <li>- ongoing consultation with Aboriginal</li> </ul> </li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>WWSF - Heritage Management Plan, Version 12 dated 28 June 2022, prepared by Artefact Heritage Pty Ltd.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with LSbp Development Manager.</p>	<p>Preparation, submission and approval of the Heritage Management Plan (HMP) for the development was assessed during the Construction IEA.</p> <p>The HMP was updated as a result of the Enforceable Undertaking (Refer to S3.19). The majority of implementation requirements of the HMP were assessed during the Construction IEA. There were no unexpected finds reported within this audit period. No-go zones were established and have been maintained (observed during the Operational IEA site inspection).</p> <p>Generally the project is considered compliant with the implementation of the HMP within this audit period.</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
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	<p>stakeholders during the implementation of the plan;</p> <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the <a href="#">Planning Secretary's</a> approval, the Applicant must implement the Heritage Management Plan.</p>			
S3.21	<p><b>SOIL AND WATER</b></p> <p><b>Water</b></p> <p>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.</p> <p><i>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.</i></p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with LSbp Development Manager.</p>	<p>Water licences were investigated, however were not obtained. All water for the project during construction was purchased from Goldenfields Water County Council and Clear Ridge Enterprises Pty Ltd.</p> <p>Rain water is being collected from the roof of the Operation and Maintenance Building for domestic and potential stock use during the operational phase.</p>	C
S3.22	<p><b>Water Pollution</b></p> <p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with LSbp Development Manager.</p>	<p>It was reported that there has been no water pollution incidents or events on the project at the time of this audit.</p> <p>The auditor did not identify any evidence of water pollution in the standing water observed on the site at the time of the audit.</p>	C
S3.23	<p><b>Operating Conditions</b></p> <p>The Applicant must:</p> <ul style="list-style-type: none"> <li>ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed</li> </ul>	<p>Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>and maintained to reduce impacts on localised flooding and groundwater at the site;</p> <ul style="list-style-type: none"> <li>• minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version;</li> <li>• ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</li> <li>• ensure all works are undertaken in accordance with the following, unless DPE Water agrees otherwise: <ul style="list-style-type: none"> <li>• Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version; and</li> <li>• Policy and Guidelines for Fish Habitat Conservation and Management (2013), or its latest version.</li> </ul> </li> </ul>		<p>Solar panels and ancillary infrastructure, including security fencing appears to have been designed and constructed to with consideration to flooding and groundwater.</p> <p>Access roads include dedicated high-flow water crossings, including stabilised rock checks.</p> <p>Sediment and erosion is to be monitored throughout operations, but no negative impacts were observed during the Operational IEA site inspection.</p> <p>Waterway crossing appear to address the requirements of the Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), and Policy and Guidelines for Fish Habitat Conservation and Management (2013).</p>	



Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
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S3.24	<p><b>HAZARDS</b></p> <p><b>Fire Safety Study</b></p> <p>Prior to commencing construction of the battery storage facility, unless the <a href="#">Planning Secretary</a> agrees otherwise, the Applicant must prepare a Fire Safety Study of the development, to the satisfaction of FRNSW and the <a href="#">Planning Secretary</a>.</p> <p>The study must:</p> <p>(a) be consistent with the:</p> <ul style="list-style-type: none"> <li>• Department’s Hazardous Industry Planning Advisory Paper No. 2 ‘Fire Safety Study’ guideline; and</li> <li>• NSW Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and</li> </ul> <p>(b) describe the final design of the battery storage facility.</p> <p>Following the <a href="#">Planning Secretary</a>’s approval, the Applicant must implement the measures described in the Fire Safety Study.</p>	<p>Discussion with LSbp Development Manager.</p> <p>Site inspection observations 18 – 20 July 2023.</p>	<p>Construction of the Battery Storage Facility has not commenced and a Fire Safety Study has not yet been prepared for the development.</p> <p>The requirements of this condition have not yet been triggered.</p>	NT
S3.25	<p><b>Storage and Handling of Dangerous Goods.</b></p> <p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<p>Site inspection observations 18 – 20 July 2023.</p>	<p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit. There were no dangerous goods stored on site at the time of the Operational IEA site inspection.</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S3.26	<p><b>Operating Conditions</b> The Applicant must:</p> <p>(a) minimise the fire risks of the development;</p> <p>(b) ensure that the development:</p> <ul style="list-style-type: none"> <li>• includes at least a 10 metre defensible space around the perimeter of the solar array area and battery storage areas that permits unobstructed vehicle access;</li> <li>• manages the defensible space and solar array areas as an Asset Protection Zone;</li> <li>• complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones; and</li> <li>• is suitably equipped to respond to any fires on site including provision of a 45,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to the internal access road;</li> </ul> <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.</p>	<p>Discussion PCL Site Manager</p> <p>Overall Layout Plan - Work As Executed, prepared by Robert Bird Group, Revision 7 dated 13 April 2023.</p> <p>Site inspection observations 18 – 20 July 2023.</p> <p>Discussion with Ventia Site Manager.</p> <p>Discussion with LSbp Development Manager.</p>	<p>An asset protection zone (10m defensible space) has been established around the perimeter of the site. This includes a 4m access track within the APZ. The APZ was observed managed with mown grass and clear access track. 2 x 22,500L water tanks installed at the site compound with Storz fitting.</p> <p>It was reported that the local RFS has been contacted with regard to the operational phase of the development and that a site visit is being coordinated.</p> <p>Generally the site appears consistent with the requirements of this condition.</p>	C
S3.27	<p><b>Emergency Plan</b> Prior to commissioning operations, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of</p>	<p>LSbp Emergency Response Plan, Revision 1 dated 16 November 2021, prepared by Riskcon Engineering Pty Ltd.</p> <p>Ventia Emergency Response Management Plan – West Wyalong Solar Farm, Revision 1 dated 26 April 2023.</p>	<p>A copy of the Ventia Project Emergency Response Management Plan was located at the main gate to the solar farm and another copy was located at the shared access gate on Blands Lane / Clear Ridge Road.</p>	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <ul style="list-style-type: none"> <li>(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning';</li> <li>(b) identify the fire risks and controls of the development; and</li> <li>(c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site.</li> </ul> <p>Following approval, the Applicant must implement the Emergency Plan for the duration of the development.</p>	<p>Correspondence from NSW Rural Fire Service – Bland Temora Zone, dated 17 January 2022 re: West Wyalong Solar Farm Emergency Management Plan – RFS Comments. RFS confirmed from a rural fire perspective the plan meets all Rural Fire Service requirements.</p> <p>Correspondence from Fire + Rescue NSW, dated 31 January 2022, Re: West Wyalong Solar Farm Emergency Plan – Fire and Rescue (FRNSW) Consultation. FRNSW acknowledged correspondence received 27 January 2022 requesting consultation and also endorsed the plan, noting satisfaction for the solar farm, but the plan requires updating if battery storage is constructed.</p> <p>Discussion with Ventia Site Manager re: Local Emergency Management Committee.</p>	<p>LSbp have prepared an Emergency Response Plan, in consultation with and to the satisfaction of RFS and FRNSW.</p> <p>Ventia are currently in consultation with the Local Emergency Management Committee.</p>	
S3.28	<p><b>Waste</b></p> <p>The Applicant must:</p> <ul style="list-style-type: none"> <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 sent to an appropriately licensed waste facility for disposal.</li> </ul>	<p>Waste Register</p> <p>Waste receipts from Bland Shire Council ( December 2022, 01 March 2023; 03 February 2023)</p> <p>Waste receipts from Access Metal Recycling (14 &amp; 24 February 2023).</p> <p>No waste on site.</p>	<p>A waste register has been used to record details of waste removed from site. Waste is classified and general solid waste (mixed waste), recycling (cardboard, steel, timber) and waste water. Waste docket and receipts, including from Bland Shire Council are also maintained.</p> <p>On the basis of no waste issues being identified during the audit site inspection, the project is generally considered compliant with the requirements of this condition.</p>	C
S3.29	<p><b>Accommodation and Employment Strategy</b></p> <p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the <a href="#">Planning Secretary</a>. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) propose a strategy to ensure there is sufficient accommodation for the</li> </ul>	<p>Accommodation and Employment Strategy (AES) – West Wyalong Solar Far, Rev 02, 07 August 2020, prepared by pitt&amp;sherry.</p> <p>Correspondence from NSW DPIE to LSbp, dated 24 August 2020, RE: approval of the Accommodation and Employment Strategy (Rev 2, dated 07 August 2020).</p> <p>PCL data: Local Businesses and Employees.</p>	<p>An Accommodation and Employment Strategy was developed, in consultation with Bland Shire Council, and approved by the Secretary one year prior to the commencement of construction.</p> <p>The Accommodation and Employment Strategy generally appears implemented</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status								
	<p>workforce associated with the development;</p> <p>(b) consider the cumulative impacts associated with other State significant development projects in the area;</p> <p>(c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and</p> <p>(d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.</p> <p>Following the <a href="#">Planning Secretary</a>'s approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<p>Discussion with Ventia Site Manager.</p>	<p>on the project. Local contractors have been engaged where possible. PCL provided a register of local engagement, which identifies 9 local businesses with 39 personnel employed.</p> <p>Ventia have engaged local employees to manage the operational phase of the project.</p>									
<p><b>S3.30</b></p>	<p><b>Decommissioning and Rehabilitation</b></p> <p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant shall rehabilitate the site to the satisfaction of the <a href="#">Planning Secretary</a>. This rehabilitation must comply with the below objectives in <a href="#">Table 2</a>.</p> <p><a href="#">Table 2: Rehabilitation Objectives</a></p> <table border="1" data-bbox="277 1002 797 1375"> <thead> <tr> <th data-bbox="277 1002 445 1034"><i>Feature</i></th> <th data-bbox="445 1002 797 1034"><i>Objective</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="277 1034 445 1190">Site</td> <td data-bbox="445 1034 797 1190"> <ul style="list-style-type: none"> <li>• Safe, stable and non-polluting</li> <li>• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li> </ul> </td> </tr> <tr> <td data-bbox="277 1190 445 1283">Solar farm infrastructure</td> <td data-bbox="445 1190 797 1283"> <ul style="list-style-type: none"> <li>• To be decommissioned and removed, unless the <a href="#">Planning Secretary</a> agrees otherwise</li> </ul> </td> </tr> <tr> <td data-bbox="277 1283 445 1375">Land use</td> <td data-bbox="445 1283 797 1375"> <ul style="list-style-type: none"> <li>• Restore land capability to pre-existing use (at least Class 3 Land Capability)</li> </ul> </td> </tr> </tbody> </table>	<i>Feature</i>	<i>Objective</i>	Site	<ul style="list-style-type: none"> <li>• Safe, stable and non-polluting</li> <li>• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li> </ul>	Solar farm infrastructure	<ul style="list-style-type: none"> <li>• To be decommissioned and removed, unless the <a href="#">Planning Secretary</a> agrees otherwise</li> </ul>	Land use	<ul style="list-style-type: none"> <li>• Restore land capability to pre-existing use (at least Class 3 Land Capability)</li> </ul>	<p>Operations commenced 15 April 2023 and remain ongoing at the time of this Operational IEA.</p>	<p>Operations remain ongoing and as such the requirements of this condition have not yet been triggered.</p>	NT
<i>Feature</i>	<i>Objective</i>											
Site	<ul style="list-style-type: none"> <li>• Safe, stable and non-polluting</li> <li>• Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</li> </ul>											
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COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
	<table border="1"> <tr> <td data-bbox="277 266 445 296">Community</td> <td data-bbox="452 266 801 296"> <ul style="list-style-type: none"> <li>• Ensure public safety</li> </ul> </td> </tr> </table>	Community	<ul style="list-style-type: none"> <li>• Ensure public safety</li> </ul>			
Community	<ul style="list-style-type: none"> <li>• Ensure public safety</li> </ul>					
S4.1	<p><b>SCHEDULE 4 ENVIRONMENTAL MANAGEMENT AND REPORTING Environmental Management Strategy</b> Prior to commencing the development, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the <a href="#">Planning Secretary</a>. This strategy must:</p> <ol style="list-style-type: none"> <li>provide the strategic framework for environmental management of the development;</li> <li>identify the statutory approvals that apply to the development;</li> <li>describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>describe the procedures that would be implemented to:                             <ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the</li> </ul> </li> </ol>	<p><b>Construction</b> Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p><b>Operations</b> Environmental Management Strategy (EMS) – West Wyalong Solar Farm, Rev 02, dated 27 July 2021, prepared by Pitt and Sherry. Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia. Evidence of EMS / EMP implementation:</p> <ul style="list-style-type: none"> <li>• Asset Management audit 15 December 2022.</li> <li>• Internal audit being completed at the time of this Operational IEA.</li> <li>• Environmental Workplace Inspections, 07 July 2023</li> <li>• VenSafe (software for recording actions and close out).</li> <li>• Ventia SHEQ Environmental Inspection Checklist – 29 June 2023. 4 issues identified and tracked in SOLVSAFETY (VenSafe). For</li> </ul>	<p>This IEA focusses on the Operational phase of the project.</p> <p>The construction phase was assessed in the Construction IEA, completed by J2M Systems in November 2021.</p> <p>An Environmental Management Strategy (EMS) was prepared and approved by the Secretary one (1) year prior to commencement of construction. The EMS was updated as required by the approval 12 days prior to commencement of construction (EMS, Rev 2).</p> <p>The Operation and Maintenance Contractor has prepared an additional Site Health Safety and Environment Plan for implementation throughout the</p>	C		

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>operation and environmental performance of the development;</p> <ul style="list-style-type: none"> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise;</li> <li>respond to any non-compliance;</li> <li>respond to emergencies; and</li> </ul> <p>(e) include:</p> <ul style="list-style-type: none"> <li>references to any plans approved under the conditions of this consent; and</li> <li>a clear plan depicting all the monitoring to be carried out in relation to the development.</li> </ul> <p>Following the <a href="#">Planning Secretary</a>'s approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>example, signed action VEN-WIC43-368 re: waste bins to be procured for site.</p> <ul style="list-style-type: none"> <li>No incidents since commencement of operations.</li> <li>Emergency response plan, Drill (minimum 12 monthly).</li> <li>Monthly Environmental Performance Reporting – VenSafe.</li> <li>Internal audit – 3 monthly post mobilisation audit, partially implemented. One report available.</li> <li>VenSafe – evidence of corrective action (some on file).</li> </ul> <p>The following Protocols were also available and form part of the EMP:</p> <ul style="list-style-type: none"> <li>Protocol 2 Habitat Box Procedure</li> <li>Protocol 3 Methods for Re-using Resources and Woody Debris</li> <li>Protocol 4 Weed Management.</li> </ul>	<p>construction phase of the project, as required by the EMS.</p> <p>Evidence was available to support implementation of the EMS and EMP for the Operational phase of this project, including inspections and audits. It is noted that the EMP requires inspections and audits to be undertaken at quarterly and 6-monthly frequencies, and operations only commenced within 3 months prior to this IEA.</p>	
S4.2	<p><b>Revision of Strategies, Plans and Programs</b></p> <p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the <a href="#">Planning Secretary</a> prior to carrying out any upgrading or decommissioning activities on site; and;</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the <a href="#">Planning Secretary</a> within 1 month of the:</p> <ul style="list-style-type: none"> <li>submission of an incident report under condition 4 of Schedule 4;</li> <li>submission of an audit report under condition 6 of Schedule 4; or</li> <li>any modification to the conditions of this consent.</li> </ul>	<p>Discussion with LSbp Development Manager, plans were reviewed following the bee tree incident, construction IEA and SSD Mod 2.</p> <p>Correspondence from NSW DPIE to LSbp, dated 15 July 2022, re: approval of Heritage Management Plan, Version 12, June 20220 (as updated following bee tree incident and enforceable undertaking).</p>	<p>a) No upgrading or decommissions works had commenced at the time of the audit and as such the requirement of this condition had not yet been triggered.</p> <p>b) The LSbp Development Manager confirmed that the EMS and supporting management plans were reviewed following the bee tree incident, construction IEA and SSD Mod 2. The HMP was formally updated, and re-approved by the Planning Secretary as a result of the Enforceable Undertaking (Refer to S3.19) following the bee tree incident.</p>	C

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S4.3	<p><b>Updating and staging of Strategies, Plans and Programs</b></p> <p>With the approval of the <a href="#">Planning Secretary</a>, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the <a href="#">Planning Secretary</a> for approval.</p> <p>With the agreement of the <a href="#">Planning Secretary</a>, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</li> <li>• If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly</li> </ul>	Discussion with LSbp Development Manager.	Management plans revised and re-submitted for approval under S4.2 above. These has not been staged submission of plans or revised strategies, plans or programs.	NT

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p><i>describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i></p>			
S4.4	<p><b>Compliance Incident Notification</b>                      The <b>Planning Secretary</b> must be notified in writing via the <b>Major Projects website</b> immediately after the Applicant becomes aware of an incident. <b>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.</b>                      Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.</p>	<p>Discussion with PCL EPC Site Manager.                      Discussion with Ventia Site Manager.                      Discussion with LSbp Development Manager.</p>	<p>There were no incidents reported within this audit period.</p>	NT
S4.5	<p><b>Non-compliance notification</b>                      The <b>Department Planning Secretary</b> must be notified in writing via the <b>Major Projects website portal</b> within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. <b>The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not</b></p>	<p>Correspondence from LSbp to NSW DPE, dated 19 January 2022 re: Non-compliance with approved transport route – Service level agreement (notification via Major Project Portal).                      Correspondence from NSW DPE, dated 21 January 2022, re: Self-reported non-compliance with approved transport route and requesting further information.</p>	<p>LSbp notified the department of a non-compliance with approved transport route in accordance with the requirements of this condition.</p>	C



Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<del>comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance. (Now 5A)</del>	Correspondence from LSbp, dated 28 January 2022, responding to the NSW DPE request for information (in response to NSW DPE request dated 21 January 2022), as submitted via the Major Project Portal.		
<b>S4.5A</b>	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 done, or will be, undertaken to address the non-compliance.	Correspondence from NSW DPE, dated 21 January 2022, re: Self-reported non-compliance with approved transport route and requesting further information.  Correspondence from LSbp to NSW DPE, dated 08 December 2021 re: Non-compliance Notification following Construction IEA.	The non-compliance notifications appear to have adequately addressed the requirements of this condition and NSW DPE did not advise otherwise in their correspondence in response to the non-compliance notification.	C
<b>S4.5B</b>	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted.	Noted.	NT
<b>S4.6</b>	<b>Independent Environmental Audit</b> Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	<b>Construction</b> Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021. <b>Operations</b> This Operational IEA Independent Environmental Audit. Correspondence from J2M Systems to LSbp dated 09 June 2023 re: Audit Notice – Operational IEA West Wyalong Solar Farm. Correspondence from LSbp to NSW DPE dated 23 May 2023 re: Operational IEA (delay to site inspection). Correspondence from NSW DPE to LSbp dated 30 May 20223, re: Operational IEA timing (noting IEA has commenced within 3-months of operations, however the site inspection will not occurring until after the 3-month time period).	Works relating to the Operational IEA commenced within 3 months of commencing operations, including endorsement of the auditor, consultation with relevant stakeholders, preparation of audit scope, issue of audit notice, review of background documentation and booking site inspection dates.  Whilst the site inspection fell outside of the 3-month timeframe the IEA process had commenced and thus compliant with the requirements.	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
S4.6A	Proposed independent auditors be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Correspondence from NSW DPE to LSbp, dated 22 May 2023, RE: Operational Independent Environmental Audit Team Approval Request May 2023.	Mr Peter Marshman of J2M Systems was endorsed by the Planning Secretary prior to the operational IEA commencing.	C
S4.6B	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 6 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Nil	The Auditor was not advised of any requirement to reschedule the audit.	NT
S4.6C	In accordance with the specific requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under condition 6 of Schedule 4 of the consent, or condition 6B of Schedule 4 where notice is given by the Planning Secretary;</li> <li>(b) submit the response to the Planning Secretary; and</li> <li>(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.</li> </ul>	Correspondence from NSW DPIE to LSbp dated 21 January 2022 re: Independent Environmental Audit 2021. <a href="https://lightsourcebp.com/app/uploads/2022/12/Construction-Independent-Environmental-Audit.pdf">https://lightsourcebp.com/app/uploads/2022/12/Construction-Independent-Environmental-Audit.pdf</a> (accessed 07 August 2023). <a href="https://LSbp-assets-prod.fra1.digitaloceanspaces.com/app/uploads/2023/07/20040319/CoC-4.5-Non-compliance-Notification.pdf">https://LSbp-assets-prod.fra1.digitaloceanspaces.com/app/uploads/2023/07/20040319/CoC-4.5-Non-compliance-Notification.pdf</a> <a href="https://LSbp-assets-prod.fra1.digitaloceanspaces.com/app/uploads/2023/07/20040410/West-Wyalong-SF_CoC-4.6_DPIE-Response-to-IEA-Report.pdf">https://LSbp-assets-prod.fra1.digitaloceanspaces.com/app/uploads/2023/07/20040410/West-Wyalong-SF_CoC-4.6_DPIE-Response-to-IEA-Report.pdf</a> Correspondence from LSbp to NSW DPE, dated 08 December 2021 re: Non-compliance Notification following Construction IEA, including response (actions taken) to address non-compliances and auditor recommendations.	The Applicant submitted the Construction IEA, including response to findings and recommendations as required by the requirements of this condition. The Construction IEA, LSbp response to Construction IEA findings, and NSE DPIE Response to Construction IEA report are all available on the Project Website.	C
S4.6D	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 and site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	Correspondence from NSW DPIE to LSbp dated 21 January 2022 re: Independent Environmental Audit 2021. Correspondence from LSbp to NSW DPE, dated 08 December 2021 re: Non-compliance Notification following Construction IEA, including	The Applicant submitted the Construction IEA within two weeks of the final report being issued, in compliance with the requirements of this conduction.	C

Development Consent SSD 9504 MOD 1 & MOD 2 Operational phase commenced 15 April 2023.				
COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		response (actions taken) to address non-compliances and auditor recommendations.		
S4.6E	Notwithstanding the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , 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 audits have demonstrated operational compliance.	Noted.	The Auditor was not advised of any requirement to cease the audit.	NT.
S4.7	<p><b>Access to information</b> The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> <li>• the EIS;</li> <li>• the final layout plans for the development;</li> <li>• current statutory approvals for the development;</li> <li>• approved strategies, plans or programs required under the conditions of this consent;</li> <li>• the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</li> <li>• how complaints about the development can be made;</li> <li>• complaints register;</li> <li>• compliance reports;</li> <li>• any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</li> </ul>	<p><a href="https://www.lightsourcebp.com/au/projects/west-wyalong-solar-project/">https://www.lightsourcebp.com/au/projects/west-wyalong-solar-project/</a></p> <p>The following documentation is provided on the Project website:</p> <ul style="list-style-type: none"> <li>• The EIS, including EIS Appendices A – R.</li> <li>• Approved Layout Plan,</li> <li>• Final Layout Plan</li> <li>• Works as Executed Plan (Rev 7, April 2023).</li> <li>• Development Consent</li> <li>• Assessment Report, November 2019.</li> <li>• Notice of Decision</li> <li>• SSD Development Consent Mod 1 (22 September 2021)</li> <li>• SSD Development Consent Mod 2 (26 July 2022)</li> <li>• Environmental Management Strategy (Rev 2, July 2021)</li> <li>• Accommodation and Employment Strategy (Rev 2, August 2020)</li> <li>• Landscaping Plan (Rev H, August 2020)</li> <li>• Heritage Management Plan (Rev 12 June 2022)</li> <li>• Biodiversity Management Plan (Rev 3, December 2020)</li> <li>• Traffic Management Plan (Rev 4, November 2021)</li> <li>• Emergency Plan (Rev 1, November 2021)</li> <li>• Construction IEA (November 2021)</li> <li>• LSbp response to Construction IEA findings</li> <li>• NSW DPIE response to Construction IEA Report</li> </ul>	<p>The LSbp project website was reviewed by the auditor throughout the audit period and was found to include, and thus make publicly available, the relevant information as required by this condition.</p> <p><b>CoC OFI #5</b></p> <p><b>Auditor Recommendation:</b></p> <p>The project website currently provides a link to the superseded Traffic Management Plan (Rev 4) rather than the approved Traffic Management Plan (Rev 5).</p>	C (with OFI)

COC ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• any other matter required by the <a href="#">Planning Secretary</a>; and</li> <li>(b) keep this information up to date.</li> </ul>	<ul style="list-style-type: none"> <li>• Feedback Policy</li> <li>• Feedback Register.</li> </ul>		

End of Consolidated Consent.

## Environmental Impact Statement - Compliance Status Descriptors

Status	Abbreviation	Description
Consistent	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been met with within the scope of the audit.
Inconsistent	IC	The auditor has determined that one or more specific elements of the conditions or requirements have not been met within the scope of the audit.
Not triggered	NT	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.

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Biodiversity</b>			
<b>Removal of trees – as per calculations based on BAM for Myers Lane (Case No. 00013377) and paddock trees (Case No 00013425) clearing.</b>	<p><b>In the BDAR two options are presented to address:</b></p> <p><b>Option 1:</b> The offset calculations determined that the purchase and retirement of 68 ecosystem credits would be required to meet the offset obligation, as presented in <b>Table 25</b> (vegetation removal) and <b>Table 26</b> (paddock tree removal) of the BDAR.</p> <p><b>Option 2:</b> Offset obligations can also be met by purchase and retirement of the credits listed in direct payment of \$188,143.67 into the Biodiversity Conservation Fund.</p>	<p>Correspondence from NSW Biodiversity Conservation Trust, dated 03 April 2023, Statement confirming payment into the Biodiversity Conservation fund for an offset obligation (PCT177 – 13 Credits).</p> <p>Correspondence from NSW Biodiversity Conservation Trust, dated 15 September 2022, Statement confirming payment into the Biodiversity Conservation fund for an offset obligation (PCT 26 – 5 Credits / PCT 76 – 2 Credits).</p> <p>Correspondence from NSW Office of Environment and Heritage (OEH), dated 09 November 2022, RE: RETIRE40 - West Wyalong Fund Pty Ltd as trustee for the West Wyalong Trust - biodiversity credit retirement approved (PCT 55 – 41 Credits).</p>	Biodiversity offsets credits were finalised within 2 years of the development commencing as required by the requirements of this condition.	C
<b>Damage to ecological community centrally located on the site from grazing of animals</b>	A livestock fence will be provided around the perimeter of the central EEC to prevent any damage of this area by animals grazing on the site.	<p>Site observations – 20 – 22 October 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	This has been provided. Livestock fence was observed installed around the central EEC at the time of the audit site inspection and has been maintained throughout construction and into the operational phase of the development.	C
<b>Construction Impacts - Erosion control</b>	Installation of erosion and sediment control measures prior to any works; Regular inspection of erosion and sediment control measures, particularly following rainfall events, to ensure their ongoing functionality; and	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	Sediment fencing has now been removed from site as the project is in operational phase. No sedimentation or erosion control issues were identified during the audit site inspection.	C

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	<p>The immediate removal offsite of excavated materials.</p> <p>Measures that should be adopted during stockpiling of materials should include:</p> <ul style="list-style-type: none"> <li>• Avoid stockpiling of materials adjacent to native vegetation, but instead use areas that are already cleared/ disturbed.</li> <li>• Undertake maintenance of silt fences and other mitigation measures to isolate runoff.</li> </ul>			
<b>Construction Impacts – Dust Control</b>	<ul style="list-style-type: none"> <li>• Setting maximum speed limits for all traffic within the study area to limit dust generation.</li> <li>• Use of a water tanker or similar to spray unpaved access tracks during the construction phase, where required.</li> <li>• Application of dust suppressants or covers on soil stockpiles.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	<p>Sign posted 40 km/h on main site access road.</p> <p>Sign posted 60km/h on Blands Lane.</p> <p>Managed during construction, no stockpiles remain on site.</p>	C
<b>Construction Impacts – Chemical Spill Control</b>	<ul style="list-style-type: none"> <li>• All chemicals must be kept in clearly marked bunded areas.</li> <li>• Regularly inspect vehicles and mechanical plant for leakage of fuel or oil.</li> <li>• No re-fuelling of vehicles, washing of vehicles or maintenance of vehicles and plant to be undertaken within 20 m of natural drainage lines</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	<p>Minimal quantities of substances stored on site. Spill kits were observed on site. Substances are stored in the designated operation and maintenance facility.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	C
<b>Pre-clearance surveys</b>	<ul style="list-style-type: none"> <li>• Pre-clearing surveys are to be undertaken by a Proposal Ecologist prior to commencement of any vegetation clearing activities within the Proposal Site. The Proposal Ecologist will conduct pre-clearing surveys to identify: <ul style="list-style-type: none"> <li>○ Fauna species likely to be encountered during construction and potential impacts to fauna during vegetation clearing;</li> <li>○ Potential fauna habitat in the Proposal Site; and</li> </ul> </li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p>	<p>Reports from OzArk Environment and Heritage provide a summary of pre-clearance surveys and ecologist observations during clearing of vegetation on the WWSF site. This is generally considered consistent with the proposed mitigation measures.</p>	C

Environmental Impact Statement Safeguards and mitigation measures				
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	<ul style="list-style-type: none"> <li>○ Preferred locations to relocate fauna species and habitat features that can be retained following construction.</li> <li>● Pre-clearing surveys will take place 1-2 weeks prior to the commencement of vegetation clearing. The Proposal Ecologist will mark all potential fauna habitat (e.g. habitat trees, nest trees, burrows, etc.) in the development footprint with high visibility tape (e.g. trees, large woody debris and nests).</li> </ul>			
<b>Vegetation Clearing Protocols</b>	<ul style="list-style-type: none"> <li>● A Proposal Ecologist is to be present on site during all vegetation clearing operations.</li> <li>● Areas of vegetation outside the development footprint are to be clearly demarcated with high visibility tape to prevent accidental clearing during the construction phase.</li> <li>● Vegetation should be cleared in a way that will allow fauna species living in or near the clearing site enough time to move out of the area without additional human intervention.</li> <li>● No clearing should occur during the early evening or at night, as this is when fauna species are most likely to be on the move and are more vulnerable to injury.</li> <li>● Habitat links must be maintained during clearing to allow fauna species to move safely from the site to adjacent areas.</li> <li>● Clearing should begin in the area that is furthest from vegetation to be retained.</li> <li>● The direction of clearing should also ensure that fauna species are directed away from threats such as roads, developed areas or disturbed areas (e.g. residential areas or cleared spaces &gt; 100m).</li> <li>● Sequential clearing should not create an 'island' of habitat that is isolated from adjoining habitat by roads or cleared and disturbed areas.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021. Self-reported non-compliance re: Bee Tree Incident. MCoc Schedule 3, Conditions 19 and 20.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p>	<p>The majority of clearing works were assessed as part of the Construction IEA. This audit assessed clearing works within Myers Lane, as this was completed within the current audit period.</p> <p>OzArk Environment and Heritage provide a summary of pre-clearance surveys and ecologist observations during clearing of vegetation within Myers Lane. This is generally considered consistent with the proposed mitigation measures.</p>	C

Environmental Impact Statement Safeguards and mitigation measures				
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<b>Habitat Tree Removal Protocols</b>	<ul style="list-style-type: none"> <li>All habitat trees to be cleared are to be surveyed and marked with high visibility tape prior to clearing.</li> <li>Clearing should be undertaken in the spring period to facilitate survival of displaced animals.</li> <li>Habitat trees are to be mechanically shaken or agitated prior to felling to encourage any remaining animals to either leave the tree or show themselves and subsequently be removed by the Proposal Ecologist prior to felling.</li> <li>Felling will involve gently pushing the tree and lowering or felling using a forestry harvester to avoid sudden falling as this is likely to injure wildlife.</li> <li>Following felling, habitat trees will be systematically checked from the ground by the Proposal Ecologist for any remaining fauna.</li> <li>Felled habitat trees will be left overnight (i.e. in an adjacent habitat area if required) to allow any undetected fauna further opportunity to escape.</li> <li>If any hollow-bearing tree is found or suspected to contain any threatened species, the tree should be left in place for a minimum of two days and, if possible, be reinspected no more than two hours prior to felling.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p>	<p>The majority of clearing works were assessed as part of the Construction IEA. This audit assessed clearing works within Myers Lane, as this was completed within the current audit period.</p> <p>OzArk Environment and Heritage provide a summary of pre-clearance surveys and ecologist observations during clearing of vegetation within Myers Lane. This is generally considered consistent with the proposed mitigation measures.</p>	C
<b>Management of Displaced Fauna</b>	<ul style="list-style-type: none"> <li>All handling of fauna species should be conducted by the Proposal Ecologist.</li> <li>In the event that arboreal animals do not move or they cannot be captured because the tree hollow to be removed is too large, too high or its recovery would breach OH&amp;S requirements then the tree will be felled (i.e. in the direction of other tree debris if possible)</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p>	<p>The majority of clearing works were assessed as part of the Construction IEA. This audit assessed clearing works within Myers Lane, as this was completed within the current audit period.</p> <p>OzArk Environment and Heritage provide a summary of pre-clearance surveys and ecologist observations during clearing of vegetation within Myers Lane. This is generally considered consistent with the proposed mitigation</p>	C



Environmental Impact Statement Safeguards and mitigation measures				
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	<p>and animals recovered and relocated to suitable adjacent habitat.</p> <ul style="list-style-type: none"> <li>Animals are to be removed and relocated to the adjacent bushland/nest boxes within the Western Offset Area prior to felling or the tree shall be sectioned and dismantled under the supervision of the Proposal Ecologist before relocating the animals.</li> <li>Nocturnal fauna species, such as microbats, are to be 'soft released' using bat boxes placed in adjacent habitat.</li> <li>Nocturnal fauna species, such as gliders and possums, are to be secured in suitable enclosures and kept in a quiet, dark and cool environment until they can be released into suitable habitat after dark.</li> <li>If any injured fauna species are found during the construction period, construction must stop immediately so that the injured animal can be taken to a vet or wildlife carer.</li> </ul>	<p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p> <p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p>	<p>measures. No fauna relocations were required during the works.</p>	
<b>Weed Management</b>	<ul style="list-style-type: none"> <li>Induction materials containing detailed information pertaining to the identification of high threat weeds should be prepared by a suitably trained ecologist or bush regenerator. These materials should be provided to contractors who will carry out construction works within the Proposal Site.</li> <li>All vehicles, equipment, footwear and clothing should be clean and free of weed propagules prior to entering the Proposal Site.</li> <li>Any weeds that are removed during the construction phase should be disposed of via an appropriate waste solar farm.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Nutrien Ag Solutions – Broadleaf weed recommendations for West Wyalong Solar Farm, dated 03 September 2021.</p> <p>Herbicide application records, prepared by Nigel Duncan, dated between 04 April and 22 May 2023</p> <p>Discussion with Ventia Site Manager.</p>	<p>Weed management continues to be addressed on site. Ventia are currently in the processes of engaging a contractor for long term weed management on site.</p>	C
<b>Fauna Monitoring</b>	<p>To reduce the potential for impacts to mobile fauna species such as the Inland Forest Bat (<i>Vespardelus baverstocki</i>) it is recommended that the security perimeter fence is inspected annually as part of a fauna monitoring proposal. The</p>	<p>Sample of weekly environmental site inspections and specific inspection records of:</p> <ul style="list-style-type: none"> <li>Habitat Boxes 05 December 2022, 18 February 2023 and 09 May 2023.</li> </ul>	<p><b>Inconsistent with Auditor Recommendation:</b></p> <p>Whilst the construction contractor (PCL) has inspected the nest boxes and permitter security fence, the inspections were not undertaken by a suitably trained</p>	<p>IC</p> <p>(Raised under S3.13 CoC OFI #3)</p>

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	entirety of the security perimeter fence should be inspected by a suitably trained fauna ecologist each year to look for signs of adverse impacts such as animal injury or mortality. Monitoring should be conducted for one to three-years period following proposal construction. A brief report should be prepared for the applicant following each survey.	- Perimeter fence inspection 23 April 2023	fauna ecologist and a brief report was not prepared relating to nest box use, animal injury or mortality.	
<b>Fencing Retained Vegetation</b>	To reduce the potential for adverse grazing impacts to threatened ecological communities (TECs) to be retained within the Proposal Site, it is recommended that livestock should be excluded from these areas. Suitable fences should be erected to prevent livestock from grazing areas containing TECs.	Site observations – 20 – 22 October 2021. Site Inspection observations 18 – 19 July 2023.	This has been provided. Livestock fence was observed installed around the central EEC at the time of the audit site inspection and has been maintained throughout construction and into the operational phase of the development.	C
<b>Nest-box Installation</b>	To reduce the potential for impacts to arboreal fauna species including the Inland Forest Bat ( <i>Vespaderelus baverstocki</i> ), it is recommended that the removal of habitat trees is offset by the installation of nest- boxes in the road corridors adjacent to the Proposal Site. Nest-boxes suitable for a range of fauna species should be installed at a 1:1 ratio if possible (available area). It is important that the density of nest-boxes is no greater than the natural density of hollows in better quality habitats. The success of the nest-box should be monitored for one to three years following completion of the construction phase. Any damaged nest-boxes should be replaced during this time. A brief report should be prepared for the proponent following each survey.	Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna  Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.  Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.  Discussion with PCL Site Manager Discussion with Ventia Site Manager.	OzArk Environment and Heritage reports, dated 09 September 2021 and 15 July 2022 provide a summary of nest box installation on the project. Next boxes were observed installed in the areas nominated within this report.  <b>Refer to auditor recommendation made above under Fauna Monitoring.</b>  Note: Construction completed 3 months ago at the time of this audit. No formal monitoring had occurred at this time.	NT
	<b>Aboriginal heritage</b>			
<b>WWSF IF01 (AHIMS ID 43-4-0056)</b> <b>WWSF IF02</b>	<ul style="list-style-type: none"> <li>Surface collection of all known stone artefacts that will be impacted by the proposal prior to construction</li> </ul>	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Salvage of artefacts was completed prior to construction.	NT

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(AHIMS ID 43-4-0071)	<ul style="list-style-type: none"> <li>Cultural heritage awareness training to highlight Aboriginal significance of area and process for unexpected finds.</li> <li>Detailed analysis and recording of all collected stone artefacts and collation of data in a salvage report Retention of artefacts by West Wyalong LALC under a Care Agreement.</li> </ul>	<p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p>		
WWSF AS01 (AHIMS ID 43-4-0057)	<ul style="list-style-type: none"> <li>Surface collection of all known stone artefacts that will be impacted by the proposal prior to construction.</li> <li>NO GO zones for the lifetime of the solar farm for known stone artefacts that will not be impacted by the proposal NO GO zones to be identified on all construction plans and plans to be kept on site at all times for reference.</li> <li>Cultural heritage awareness training to highlight Aboriginal significance of area, identification of NO GO zones and processes for unexpected finds. Detailed analysis and recording of all collected stone artefacts and collation of data in a salvage report.</li> <li>Retention of artefacts by West Wyalong LALC under a Care Agreement.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	<p>Assessed as non-compliant in Construction IEA under MCoC Schedule 3, Condition 19 and 20.</p> <p>No go zones were established and remain in place. These were observed during the Operational IEA site inspection.</p> <p>No further issues or incidents reported.</p> <p>Considered compliant.</p>	C
WWSF Bee Tree (AHIMS ID 43-4-0058)	<ul style="list-style-type: none"> <li>NO GO zone for the lifetime of the proposed solar farm to be constructed around the tree in consultation with an arborist.</li> <li>Reassessment of the protection zone surrounding the tree at the conclusion of the operation of the proposed solar farm.</li> <li>Tree health to be maintained during construction and operation of the proposed solar farm.</li> <li>Cultural heritage awareness training to highlight the Aboriginal significance of area, identification of NO GO zones and processes for unexpected finds.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Bee Tree incident / non-compliance: Correspondence from NSW DPIE to LSbp, dated 21 September 202, re: West Wyalong Solar Farm (SSD 9504).</p> <p>Correspondence from PCL to NSW DPE (executed 03 June 2022) re: Enforceable Undertaking by PCL to</p>	<p>Assessed as non-compliant in Construction IEA under MCoC Schedule 3, Condition 19 and 20.</p> <p>On the basis that an Enforceable Undertaking has been taken and closed by NSW DPE the Project is consistent, with no recommendations.</p>	C

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		NSW DPE for the purposes of Section 9.5 of the Environmental Planning and Assessment Act 1979 (NSW). Correspondence from Artefact Heritage Services Pty Ltd (Artefact Heritage), dated 20 April 2023, Re: West Wyalong Solar Farm – Enforceable Undertaking Audit.		
	<b>Land</b>			
<b>Loss of agricultural land</b>	The subject site despite being proposed as a solar farm will continue to be used for agriculture through the grazing of livestock.	Discussion with LSbp Development Manager Discussion with Ventia Site Manager.	LSbp Development Manager and Ventia Site Manager confirmed sheep are being investigated to graze on the property during solar farm operations.	C
<b>Conflicts with other major proposals within the local context</b>	<ul style="list-style-type: none"> <li>• Specific construction traffic routes.</li> <li>• Staged construction phases.</li> <li>• Exploration of private rental accommodation.</li> <li>• Seeking short-term accommodation in surrounding townships.</li> <li>• Local procurement of construction workforce.</li> <li>• Local procurement of operational team workforce.</li> </ul>	Complaints register. Traffic Management Plan Accommodation and Employment Strategy Discussion with LSbp Development Manager Discussion with Ventia Site Manager	Local contractors were engaged throughout the construction phase and have been engaged for the Operational Phase. No specific complaints reported or recorded.	C
<b>Connection of electricity powerline</b>	The provision of the connection will require the approval for clearing of vegetation.	Discussion with PCL EPC Site Manager. Discussion with LSbp Associate Asset Manager. Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.	The PCL EPC Site Manager reported that Myers Lane Road Reserve was cleared in accordance with the Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines, as per the Biodiversity Management Plan.	C
<b>Concerns by NSW Free Flight Society</b>	A 100-metre-wide flight clearance buffer zone has been proposed on the south western property boundary as shown the Landscape Strategy prepared by Site Image.	Approved layout plan. Site Inspection observations 18 – 19 July 2023.	Current developments on site are within the approved layout plan.	C

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	<b>Geotechnical</b>			
<b>Natural clays</b>	Any changes to the existing surface profile will require reassessment based on the cut and fill profiles. It is recommended that any foundation systems be designed to accommodate any anticipated ground surface movements.	Discussion with PCL Site Manager. Site Inspection observations 18 – 19 July 2023. Final as built plan comparison.	The Construction Manager confirmed geotechnical and water management requirements have been considered in the design of the solar farm.	C
<b>Site Trafficability</b>	<p>It is recommended that vegetation be trimmed (mowed) and shrubs be cut to the ground level, which will preserve the crust and improve trafficability. Whereas clearing and grubbing would present issues if the crust is breached, and this would be more pronounced after rainfall events.</p> <p>It is recommended that the following steps be taken to improve trafficability:</p> <ul style="list-style-type: none"> <li>• The exposed surface in the construction area is proof rolled to provide a seal and assist in identifying weak or soft areas for treatment.</li> <li>• Dedicated construction tracks are used to control site traffic and limit trafficability issues.</li> </ul> <p>Provision and maintenance of adequate drainage conditions at this site is essential. It should be ensured that runoff is diverted away from the construction and access tracks to prevent ponding of water.</p> <p>To assist in maintaining a workable construction site, the placement of a working platform as a final layer across structure/building platforms is recommended.</p> <p>The contractor performing the works should fully inform themselves of the ground conditions at the site prior</p>	<p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p> <p>Site Inspection observations 18 – 19 July 2023.</p>	The majority of access to site is now via all-weather access roads. Coarse rock causeways are established at key locations along internal roadways and these are at ground level to allow water flow and reduce ponding.	C

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	to commencement of earthworks. This requirement should be explicit in any earthworks specifications or contract.			
<b>Material Suitability for Reuse</b>	Clays are considered unsuitable for use as structural fill (i.e. behind retaining walls and beneath structures). All site won material will require laboratory testing to confirm contamination status for reusability. Site won material may be used as general filling for access track construction subject to adequate compaction and selective rejection of any unsuitably over-wet material.	Discussion with PCL Site Manager Discussion with Ventia Site Manager. Site Inspection observations 18 – 19 July 2023.	The PCL Site Manager confirmed that the Operation and Maintenance buildings are established on road base. There was minimal cut and fill on site.  No issues were identified during the audit with regard to suitability of materials, noting that the upgrade of Blands Lane and Bodells Lane remains ongoing at the time of this Operational IEA. The auditor acknowledged that Bland Shire Council and TfNSW were all aware of the delays due to wet weather and flood damage.	C
<b>Groundwater Control</b>	If groundwater is encountered onsite it is anticipated that any flow emanating from these materials can be managed using sump pumping. This will require further assessment at the time of construction.	Discussion with PCL Site Manager Discussion with Ventia Site Manager. Site Inspection observations 18 – 19 July 2023	Ground water is no longer being managed on site as part of the operational phase of the development. If encountered sump pumps may be utilised.	C
<b>Erosion and Drainage</b>	To protect against erosion and dispersion exposed soils should be vegetated or covered. Proper site drainage will be required to divert surface water from sensitive areas in a controlled manner and prevent pooling water. It is recommended that where site construction drainage involves high concentration of flows, the drains be appropriately lined with geotextile or plastic to control erosion on the site.  Adequate site drainage will be required to remove runoff from site in a controlled manner and prevent pooling water. It is important that the site is well drained. The ground around all structures should slope away at a gradient of 1:50 for a minimum of 3 m, then fall into a stormwater collection system or overland	Discussion with PCL Site Manager Discussion with Ventia Site Manager. Site Inspection observations 18 – 19 July 2023  Erosion and Sediment Control Plan.	The site is extremely flat and no high concentration flows were evident. Sediment and erosion controls are no longer required on site during the operational phase of the development, however may be utilised if erosion issues are identified.  Coarse rock causeways are established at key locations along internal roadways and these are at ground level to allow water flow and reduce ponding.	C

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	flow paths to prevent water from ponding adjacent to structures.			
	<b>Visual</b>			
<b>Retention of existing trees</b>	Retention of existing groups of trees that centrally traverses the northern and eastern boundary of the Site and within the western half of the Site.	<p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	Existing trees that were not approved for clearing remain within no go zones, which were established during the construction phase with permanent stock fencing and signage. There is no evidence that these have been breached by construction or operational processes.	C
<b>Visual buffer</b>	<p>Infill planting to be installed maintaining a 3-metre- wide boundary screening along the remaining site edges, except along the flight society flight clearance buffer. Infill planting to match surrounding retained vegetation.</p> <p>Proposed planting species will be largely comprised of dominant species already found on site, and supplementary planting from a selection of endemic species. As per PBP and Standards for Asset Protection Zones, Trees must have clear trunk to height of 2 metres, and tall - medium shrubs be maintained to be clear of the tree canopy to ensure vertical stratification. Landscape to be planted in</p>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Site Inspection observations 18 – 19 July 2023.</p> <p>Discussion with PCL EPC Site Manager.</p> <p>Discussion with Ventia NSW Operations Manager – Electricity &amp; Gas   Infrastructure Services.</p>	<p>HML Pty Ltd were engaged by PCL and undertook vegetation buffer planting early May 2023 in all locations as outlined in the Landscape Plan, including new buffer plantings along the northern boundary and infill buffer plantings along the Southern and Eastern boundaries.</p> <p>No issues or opportunities for improvement were identified by the auditor during the Operational IEA. Ventia, as initial Operations Managers, are aware of their responsibilities under the Landscaping Plan.</p>	C

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	clumps and not provide continuous vegetation or canopy.			
<b>Night lighting</b>	<ul style="list-style-type: none"> <li>All external lighting associated with the Proposal would comply with Australian Standard AS 4282: 1997 – Control of the Obtrusive Effects of Outdoor Lighting.</li> <li>Restriction of night-lighting to the minimum required for operations and safety requirements.</li> <li>Use of directional lighting techniques.</li> <li>Use of light shrouds and reflectors to limit the spill of lighting.</li> </ul>	<p>Discussion with PCL Site Manager</p> <p>Discussion with Ventia Site Manager.</p> <p>LSbp Feedback Register – no lighting related complaints.</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>The PCL Site Manager and Ventia Site Manager reported that only safety specific lighting installed.</p> <p>On the basis that no lighting related complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.</p>	C
<b>Retention of existing vegetation</b>	<ul style="list-style-type: none"> <li>Retention of existing groups of trees that centrally traverses the northern half of the site.</li> <li>Retention of existing central vegetation within the western half of the site.</li> </ul>	<p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.</p> <p>Correspondence from OzArk Environment and Heritage, dated 15 July 2022 Re: Post-Clearance Report – Preclearance and Fauna Spotter Catcher Works, Myers Lane.</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	<p>Existing trees that were not approved for clearing remain within no go zones, which were established during the construction phase with permanent stock fencing and signage. There is no evidence that these have been breached by construction or operational processes.</p>	C
<b>Fire buffer zone</b>	<ul style="list-style-type: none"> <li>A minimum 15 metre perimeter fire buffer zone around the entire Site clear of any vegetation. Outside of this fire buffer zone is to be landscaped with buffer planting, coordinating with the requirements of the ecologist report and the visual impact assessment.</li> </ul>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>Current development on site is within the approved layout plan and includes an asset protection zone / fire buffer around the perimeter of the site (solar array).</p>	C



Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Internal vehicle access and perimeter of site</b>	<ul style="list-style-type: none"> <li>Provision for vehicle access around the perimeter of the Site and key locations internally.</li> </ul>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	Site access roads are constructed as per the approved layout plan.	C
	<b>NOISE</b>			
<b>Construction work noise</b>	<ul style="list-style-type: none"> <li>Restriction of hours of work to the ICGBN standard construction hours: <ul style="list-style-type: none"> <li>Monday to Friday: 7.00am to 6.00pm; and</li> <li>Saturday: 8.00am to 1.00pm.</li> </ul> </li> </ul>	<p>West Wyalong Solar Farm Noise Impact Assessment, Rev 1 dated 30 November 2018 prepared by SLR Consulting Australia Pty Ltd</p> <p>Complaints Register - No noise complaints.</p> <p>Site Inspection observations 18 – 19 July 2023</p>	On the basis that no complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.	C
<b>Construction – All works</b>	<p>Adoption of Universal Work Practices including:</p> <ul style="list-style-type: none"> <li>Regular reinforcement (such as at toolbox talks) of the need to minimise noise;</li> <li>Regular identification of noisy activities and adoption of improvement techniques;</li> <li>Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents;</li> <li>Where possible, avoiding the use of equipment that generates impulsive noise;</li> <li>Minimising the need for vehicle reversing for example (particularly at night), by arranging for one-way site traffic routes;</li> <li>Use of broadband audible alarms on vehicles and elevating work platforms used on site;</li> <li>Minimising the movement of materials and plant and unnecessary metal-on-metal contact; and</li> <li>Minimising truck movements.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p> <p>Traffic management Plan</p>	Not applicable to operational phase.	NT
<b>Construction Traffic</b>	<ul style="list-style-type: none"> <li>The proposed construction traffic is recommended to travel east along Blands</li> </ul>	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Not applicable to operational phase.	NT

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Lane, then south on Bodell Lane before accessing the Newell Highway.	Traffic management Plan		
	<b>Traffic and Access</b>			
<b>Flooding of Blands Lane</b>	Prior to construction commencing, the Proposal Manager will meet with Council's Assets Manager (or like) to inventory the existing local road conditions, and particularly the unsealed sections of Blands Lane and Bodells Lane.	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Not applicable to operational phase.	NT
<b>Unsealed roads and damage of roads</b>	In the event damage is noted to sections of road. Lightsource BP is to consult with Council regarding remediation for the sections of the road.	Discussion with PCL Site Manager Discussion with Ventia Site Manager.    Correspondence between PCL and Bland Shire Council, dated between 29 June 2023 and 17 July 2023 re: Blands Land and Bodells Lane Inspection (and outstanding items to complete construction and upgrading of Bland Lane and Bodells Lane).  Site Inspection observations 18 – 19 July 2023.	The upgrade of Blands Lane and Bodells Lane remains ongoing at the time of this Operational IEA. The auditor acknowledged that Bland Shire Council and TfNSW were all aware of the delays due to wet weather and flood damage.	C
	<b>Water</b>			
<b>Erosion and Sediment Control</b>	<ul style="list-style-type: none"> <li>A site wide Erosion and Sediment Control Plan (ESCP) will be prepared as part of the Construction Environmental Management Plan (CEMP) for the Proposal.</li> </ul>	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Not applicable to operational phase.	NT
<b>Storage and use of hydrocarbons and chemicals</b>	<p>The risk of hydrocarbon contamination will be mitigated by:</p> <ul style="list-style-type: none"> <li>Storage of chemicals in accordance with Australian Standards.</li> <li>Storage of hydrocarbon fuels within bunded storage areas.</li> <li>Bunding of substation or other infrastructure that utilises oil.</li> <li>Minimise usage of herbicides, and avoid spraying when rain is predicted.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia.</p> <ul style="list-style-type: none"> <li>Section 5.3.5 Hazardous materials / chemicals and spill response.</li> </ul>	<p>Minimal quantities of substances are stored on site during the operational phase of the development. Spill kits were observed on site. Substances are stored in the designated operation and maintenance facility.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	C

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>A Spill Response Plan, including emergency response and EPA notification procedures.</li> <li>Requirements for the storage and use of hydrocarbon fuels and other chemicals on site will be documented in both the Construction and Operational Management Plans.</li> </ul>			
<b>Flooding</b>	<ul style="list-style-type: none"> <li>This level would require the arrays within the north eastern portion of the Proposal Site to be designed appropriately to withstand the inundation without damage.</li> <li>Appropriate freeboard should be applied to the infrastructure above this level.</li> </ul>	Discussion with PCL Construction Manager.	Flooding impacts have been factored into the design of the solar farm.	C
<b>Construction phase water quality</b>	<ul style="list-style-type: none"> <li>Preparation of a Construction Environment Management Plan will include an Erosion and Sediment Control Plan, which will further detail requirements and procedures for erosion and sediment control, water quality monitoring, bunding of hydrocarbon storages, and spill response.</li> </ul>	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Not applicable to operational phase.	NT
<b>Water management during operations</b>	<p>Preparation of OEMP Minimum requirements for inclusion within the OEMP include:</p> <ul style="list-style-type: none"> <li>Development of a suitable strategy for monitoring and reporting on water quality;</li> <li>A procedure for erosion and sediment controls for ground disturbance activities; and</li> <li>Requirements for storage and use of hydrocarbons and chemicals, and a spill response plan.</li> </ul>	<p>Environmental Management Strategy (EMS) – West Wyalong Solar Farm, Rev 02, dated 27 July 2021, prepared by Pitt and Sherry.</p> <p>Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia.</p> <ul style="list-style-type: none"> <li>Section 5.3.1 Water Management.</li> <li>F4. Dewatering of excavations and Sediment Control Program.</li> </ul>	<p>The LSbp Environmental Management Strategy, endorsed by the Planning Secretary, includes details on operational management.</p> <p>The Operation and Maintenance Contractor has prepared an additional Site Health Safety and Environment Plan for implementation throughout the operational phase of the project, as required by the EMS.</p> <p>Given the low-lying nature of the site and lack of flow through waterways with defined input and output points, the requirement for water quality monitoring is considered obsolete.</p>	C
<b>Unsealed roads and damage of roads</b>	<ul style="list-style-type: none"> <li>Preparation of OEMP (refer to above for inclusions)</li> </ul>	Environmental Management Strategy (EMS) – West Wyalong Solar Farm, Rev 02, dated 27 July 2021, prepared by Pitt and Sherry.	As above.	C

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia.</p> <ul style="list-style-type: none"> <li>- Section 5.3.1 Water Management.</li> <li>- F4. Dewatering of excavations and Sediment Control Program.</li> </ul>		
<b>Construction Impacts</b>	<p>A construction environment management plan (CEMP) will be prepared during the detailed design phase of the proposal, and will outline the environmental measures, monitoring and reporting required to ensure satisfactory environmental performance. Minimum requirements for inclusion within the CEMP include:</p> <ul style="list-style-type: none"> <li>• Water quality monitoring during the construction phase, will be carried out as described below for the OEMP.</li> <li>• An Erosion and Sediment Control Plan (ESCP) for construction activities that is consistent with the measures outlined in this EIS.</li> </ul>	<p>Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.</p>	<p>Not applicable to operational phase.</p>	<p>NT</p>
<b>Operational Impacts</b>	<p>An operational environment management plan (OEMP) will be prepared during the detailed design phase of the proposal, and will outline the environmental measures, monitoring and reporting required to ensure satisfactory environmental performance. Minimum requirements for inclusion within the OEMP include:</p> <ul style="list-style-type: none"> <li>• Development of a suitable strategy for monitoring and reporting on water quality;</li> <li>• A procedure for erosion and sediment controls for ground disturbance activities; and</li> <li>• Requirements for storage and use of hydrocarbons and chemicals, and a spill response plan.</li> </ul>	<p>Environmental Management Strategy (EMS) – West Wyalong Solar Farm, Rev 02, dated 27 July 2021, prepared by Pitt and Sherry.</p> <p>Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia.</p> <ul style="list-style-type: none"> <li>- Section 5.3.1 Water Management.</li> <li>- Section 5.3.8 Soil Erosion and Sediment Control</li> <li>- Section 5.3.5 hazardous Materials / Chemicals and Spill Response.</li> <li>- F3 Storage and Use of Fuels and Lubricants Program.</li> <li>- F4. Dewatering of excavations and Sediment Control Program.</li> </ul>	<p>The LSbp Environmental Management Strategy, endorsed by the Planning Secretary, includes details on operational management.</p> <p>The Operation and Maintenance Contractor has prepared an additional Site Health Safety and Environment Plan for implementation throughout the operational phase of the project, as required by the EMS.</p> <p>Given the low-lying nature of the site and lack of flow through waterways with defined input and output points, the requirement for water quality monitoring is considered obsolete.</p>	<p>C</p>

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Hazards and Risks</b>			
<b>Bushfire – Asset Protection Zones (APZ)</b>	<p>APZs are provided in <b>Table 3</b> of the Bushfire and Fire response assessment prepared by SLR Consulting.</p> <p>Native trees and shrubs should be retained as clumps or islands and should maintain a covering of no more than 15 % of the APZ area.</p> <p>The conceptual development design will require vegetation to be along the boundary to allow for construction of the perimeter access road.</p> <p>The conceptual design allows for a 15 m fire break between the solar panels and the site boundary which is inclusive of a six meter, sealed perimeter access road.</p>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>Current development on site is within the approved layout plan and includes an asset protection zone / fire buffer around the perimeter of the site (solar array).</p>	C
<b>Grassland</b>	<p>The distance from the edge of the solar panels to the south western site boundary is over 100 m, which is enough to implement the recommended 50 m APZ.</p>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>Current development on site is within the approved layout plan and includes an asset protection zone / fire buffer around the perimeter of the site (solar array).</p>	C
<b>Building Construction and Design</b>	<p>BAL-12.5 construction and design standards in accordance with Australian Standard AS 3959 are recommended for the outer facades of buildings proposed to be constructed as part of the solar farm development. Relevant design standards for BAL- 12.5 include:</p> <ul style="list-style-type: none"> <li>• Metal framing and cladding materials.</li> <li>• Automatic sprinkler systems.</li> <li>• Hose reels and hydrants installed at selected locations around the buildings (on the alignment of the perimeter fire trail where possible).</li> </ul>	<p>Approved layout plans</p> <p>Construction drawings.</p> <p>Bush fire management plan.</p> <p>Fire extinguishers and detection system installed in Operation and Maintenance buildings.</p>	<p>The approved layout plan and design drawings sighted appear generally consistent with this mitigation measures. It is noted that no hose reels are installed, however bushfire mitigation controls are implemented in accordance with the endorsed Emergency Plan. Buildings were certified by Bland Shire Council.</p>	C

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Responder Access – Perimeter Road Access requirements</b>	<ul style="list-style-type: none"> <li>Provide firefighters with easier access to structures (assets).</li> <li>Provide a safe retreat (egress) for firefighters.</li> <li>Create a clear ‘control line’ from which to conduct hazard reduction or back burning.</li> <li>Carriageway with a minimum width of six metres.</li> <li>Allow for parking outside of carriageway width.</li> <li>Curves of the roads have a minimum inner radius of 6 m.</li> <li>Maximum grade of the road is 15° and the average is 10°.</li> <li>Road crossfall does not exceed 3°; and Vertical clearance of 4 m above the road surface (for overhanging branches, etc.).</li> </ul>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>Current development on site is within the approved layout plan and includes an asset protection zone / fire buffer around the perimeter of the site (solar array).</p>	C
<b>Internal access roads</b>	<ul style="list-style-type: none"> <li>Road width be a minimum of 5.5 m with parking provided outside of the carriageway.</li> <li>The conceptual design for the West Wyalong Solar Farm includes an 8m wide access road and 6m wide internal roads, with a two-lane perimeter road included along the north eastern site boundary.</li> </ul>	<p>Approved layout plan</p> <p>Work as executed plan (including comparison to approved layout plan).</p> <p>Site Inspection observations 18 – 19 July 2023</p>	<p>Current development on site is within the approved layout plan and includes an internal access roads.</p>	C
<b>Water Supply for Firefighting</b>	<p>The site is not connected to a reticulated water supply as such a dedicated static water supply is required to support the proposal. Two above ground water tanks are provided in the north east of the conceptual layout, providing combined capacity of 45,000L.</p>	<p>Site Inspection observations 18 – 19 July 2023</p> <p>Work as executed plan (including comparison to approved layout plan).</p>	<p>Two x 25,000L Water Tanks are installed on site and for provision of firefighting water supply.</p>	C

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Fuel Load Management</b>	<p>Fuel load management measures include:</p> <ul style="list-style-type: none"> <li>• Strategic grazing of sheep within the Proposal Site during operation to maintain the length of grass under the solar panels.</li> <li>• Raking or removal of fine fuels like leaves, twigs and bark on a regular basis.</li> <li>• Mowing or slashing of grass within APZs and fire breaks, only as required.</li> <li>• Pruning of existing trees and shrubs so as to not have a continuous tree canopy leading from the hazard to the asset.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023</p> <p>Discussion with Ventia Site Manager</p>	<p>Fuel load is being managed through mowing of the site. Grazing of sheep is being investigated and considered.</p>	C
<b>Landscaping</b>	<p>When maintain vegetation in an APZ the following is recommended:</p> <ul style="list-style-type: none"> <li>• Vegetation should not provide a continuous path to the asset.</li> <li>• All noxious environmental weeds (particularly priority weeds listed under the NSW Biosecurity Act 2016) should be removed.</li> <li>• Vegetation should be cleared or planted in clumps to avoid continuation.</li> <li>• Prune low branches two meters from the ground to avoid ground fires spreading into the canopy.</li> <li>• Locate plants far enough away from the asset so that in the event of a fire there is no direct flame contact or radiant heat emission.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023</p> <p>Discussion with Ventia Site Manager</p>	<p>An asset protection zone is established around the site as per the approved layout plan. This including an access track. Weeds are progressively being managed, including through spraying and slashing/mowing.</p>	C
<b>Empty containers - may explode and cause</b>	<ul style="list-style-type: none"> <li>• Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, or other sources of ignition.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023</p>	<p>No empty containers were observed on site.</p>	NT

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>injury or death</b>	<ul style="list-style-type: none"> <li>"Empty" drums should be completely drained, properly bunged, and promptly shipped to the supplier or a drum reconditioner.</li> <li>All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.</li> <li>Before working on or in tanks which contain or have contained this material, refer to OSHA regulations, ANSI Z49.1, and other references pertaining to cleaning, repairing, welding, or other contemplated operations.</li> </ul>			
<b>Storage</b>	<ul style="list-style-type: none"> <li>Keep container(s) tightly closed.</li> <li>Use and store this material in cool, dry, well-ventilated areas away from heat and all sources of ignition.</li> <li>Storage temperatures above 113°F may lead to thermal decomposition, resulting in the generation of hydrogen sulfide and other sulphur containing gases.</li> <li>Store only in approved containers.</li> <li>Keep away from any incompatible material.</li> <li>Protect container(s) against physical damage.</li> </ul>	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>Environmental Management Plan (EMP), Revision 2, dated 06 July 2023 prepared by Ventia.</p> <ul style="list-style-type: none"> <li>Section 5.3.5 Hazardous materials / chemicals and spill response.</li> </ul>	<p>Minimal quantities of substances are stored on site during the operational phase of the development. Spill kits were observed on site. Substances are stored in the designated operation and maintenance facility.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	C
	<b>Waste</b>			
<b>Damaged panels</b>	Damaged panels will be returned to manufacturers for repair and subsequent re-use.	Chain of custody and collection form for damaged panels (currently stored on site). To be collected by ElecSome	Damaged panels are currently stored on site in preparation for collection and recycling by ElecSome Pty Ltd.	C
<b>Solar &amp; Framework Packaging</b>	The packaging surrounding the solar panels and framework will be collected in a designated skip and will be collected once every working day for appropriate recycling. Pallets used for delivering the panels and cable drums will be stored until sufficient numbers make collection by the supplier.	<p>Site Inspection observations 18 – 19 July 2023.</p> <p>WWSF Waste Tracker (Waste and Recycling Collection register) tracking general waste, cardboard, steel, timber, and waste tank pump-out (septic).</p> <p>Various waste disposal receipts, including from Access Metal and Bland Shire Council.</p>	Packaging appears to have been adequately collected, stored and disposed of throughout the project.	C



Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Framework cuttings</b>	The excess metal cuttings from both the frame and screw pile foundation will be collected in a designated skip and will be collected once every working day for appropriate recycling.	Site Inspection observations 18 – 19 July 2023. WWSF Waste Tracker (Waste and Recycling Collection register) tracking general waste, cardboard, steel, timber, and waste tank pump-out (septic). Various waste disposal receipts, including from Access Metal and Bland Shire Council.	Packaging appears to have been adequately collected, stored and disposed of throughout the project.	C
<b>Excavated soil</b>	The sites require some ground works for access tracks, cable trenching, cabinet platforms. Excavated soil will be used for backfilling activities.	Site Inspection observations 18 – 19 July 2023.	Assessed during construction IEA. Appears compliant. No stockpiles of excavated soil on site.	C
<b>Mess room / Dry room</b>	Where relevant, the mess and dry rooms will be fitted out with appropriate recycling bins for the separate sorting and collection of paper, cardboard and aluminium waste.	Site Inspection observations 18 – 19 July 2023.	Recycling bins are provided in the Operations and Maintenance buildings.	C
<b>Portaloos</b>	During the construction phase of the development the portaloos will be made available at appropriate locations within the application site. The portaloos will be sourced, supplied and managed by a reputable contractor. The principle contractor will ensure that the waste is collected and disposed of by an appropriate licensed waste contractor.	Assessed in Construction IEA Report, prepared by J2M Systems Pty Ltd, dated 30 November 2021.	Not applicable to operational phase.	NT
<b>Cable &amp; Cable trench</b>	Any excess cable will be stored in a designated skip and will be collected by a reputable recycling company for either reuse or recycling. Excess trench material will be suitable segregated on site and collected by a reputable recycling company for re- use or recycling.	Site Inspection observations 18 – 19 July 2023. WWSF Waste Tracker (Waste and Recycling Collection register) tracking general waste, cardboard, steel, timber, and waste tank pump-out (septic). Various waste disposal receipts, including from Access Metal and Bland Shire Council.	Packaging appears to have been adequately collected, stored and disposed of throughout the project.	C
<b>Waste by workers</b>	Personal rubbish will be collected along with non-recyclable packing materials, for disposal at an appropriate landfill.	Site Inspection observations 18 – 19 July 2023.	Waste and recycling bins are provided on site.	C

Environmental Impact Statement Safeguards and mitigation measures				
Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<b>Waste during operations</b>	Very little waste will be generated during operation. The O&M team will be required to remove any waste materials (i.e. for example packaging for any replacement parts, or food waste) when they leave site each day.	Site Inspection observations 18 – 19 July 2023.	Waste and recycling bins are provided on site. Waste was not being stored, with the exception of items for recycling which are collected until in sufficient volume for recycling (e.g. damaged solar panels).	C
	<b>Socio-Economic</b>			
	No auditable requirements	N/A	-	N/A
End of EIS MM Checklist.				
<b>End of Audit Table.</b>				

## Appendix B: Secretary Approval of Audit Team

Ms Diana Mitchell  
Level 29  
420 George St  
Sydney New South Wales 2000

22/05/2023

Dear Ms Mitchell

**West Wyalong Solar Farm - (SSD-9504)  
Operational Independent Environmental Audit Team - approval request May 2023**

I refer to your request (SSD-9504-PA-24) for the Secretary's approval of suitably qualified persons to undertake the Operational Independent Environmental Audit (IEA) and prepare the IEA report for the West Wyalong Solar Farm SSD –9504 as modified (the consent).

The Department of Planning and Environment (the department) has reviewed the nomination and information you have provided and is satisfied that Mr Peter Marshman of J2M Systems is suitably qualified and experienced. Consequently, in accordance with Schedule 4 condition 6A of the consent, I can advise that the Secretary approves the appointment of Mr Marshman to undertake the IEA and prepare the IEA report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body and being independent of the development.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Within 2 months of completing the IEA site inspection, or otherwise as agreed by the Secretary, in accordance with Schedule 4 condition 6D, Lightsource Development Services Australia Pty Ltd is to submit a copy of the IEA report to the Secretary together with its response to any recommendations contained in the IEA report and a timetable to implement the recommendations. Prior to submitting the IEA report to the Secretary, it is recommended that Lightsource Development Services Australia Pty Ltd review the report to ensure it complies with the relevant consent condition. Please ensure this correspondence is appended to the IEA report.

Should you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

## Appendix C: Consultation

26 June 2023

TfNSW reference: STH23/00151  
Your reference: SSD-9504-PA-31

J2M Systems Pty Ltd  
By email: [peter@j2m.com.au](mailto:peter@j2m.com.au)

Attention: Peter Marshman

**SSD-9504-PA-31 – Proposed West Wyalong Solar Farm – Consultation for Independent Environmental Audit – LOTS 17 & 118 DP753081 – BLANDS LANE WYALONG**

Dear Peter

Transport for NSW (TfNSW) is responding to the SSD-9504-PA-31 referred on 30 May 2023.

TfNSW has reviewed the information and has provides the following input regarding the environmental performance of this development which is set out in Attachment 1.

TfNSW notes that in determining the application under Part 4 of the *Environmental Planning & Assessment Act 1979* it is the consent authority's responsibility to consider the environmental impacts of any road works that are ancillary to the development (such as removal of trees, relocation of utilities, stormwater management, etc). Depending on the nature of the works, the Council may require the developer to submit a further environmental assessment for any ancillary road works.

On Council's determination of this matter, please forward a copy of the Notice of Determination to TfNSW. If you have any questions, please contact me on 0417 508 107 or email [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au).

Yours faithfully



**Cam O'Kane**  
Case Officer, Development Services South

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OFFICIAL

**SSD-9504-PA-31 – Proposed West Wyalong Solar Farm – Consultation for Independent Environmental Audit – LOTS 17 & 118 DP753081 – BLANDS LANE WYALONG**

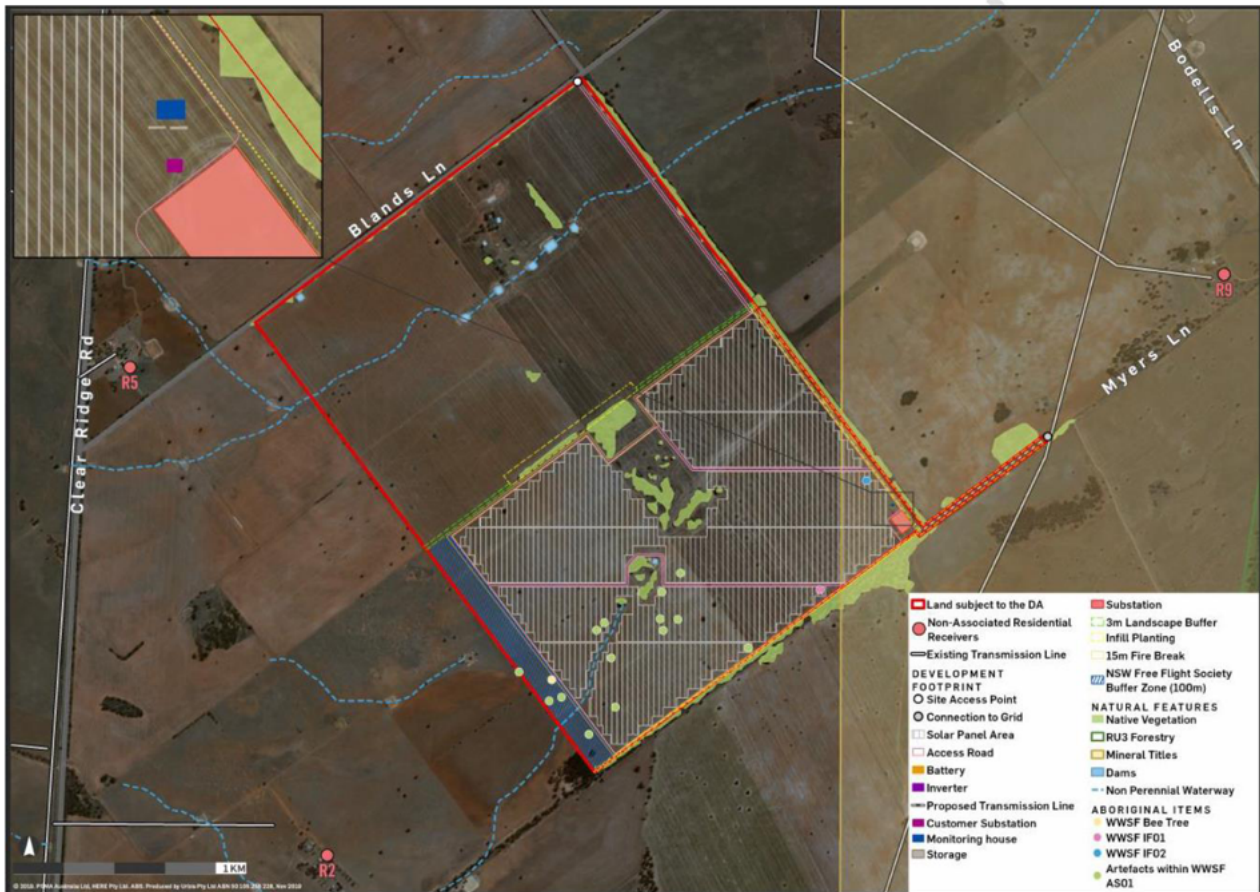
**Context**

TfNSW notes for this DA:

- The key classified state road is the Newell Highway. Access to the site is available from the local road network (Blands Lane) in a 100kmh speed zone;
- The development proposed establishment of a Solar Farm project with an intended capacity of up to 130 Mega Watt plus ancillary infrastructure on the subject site (as shown in **Attachment 2**);
- In accordance with Schedule 4, Condition 6 of Project Approval SSD 9504 for the Solar Farm, an Operational Independent Environmental Audit (IEA) is required to be undertaken within three (3) months of commencement of operations. J2M Systems Pty Ltd have been engaged by the development to undertake this audit;
- TfNSW notes that the proponent has upgraded the intersection of Bodells Road with the Newell Highway as required by Condition 5 of the Development Consent SSD-9504-Mod-1 dated 22 September 2021;
- Additionally, the applicant prepared and submitted a Traffic Management Plan to TfNSW which was required by Condition 7 of the aforementioned Consent.



GENERAL LAYOUT OF DEVELOPMENT



OFFICIAL

Your ref: SSD 9504 (PAE-58834959)

Our ref: DOC23-503009

Peter Marsham  
Director  
J2m Systems Pty Ltd

Via email: [peter@j2m.com.au](mailto:peter@j2m.com.au) / Major Projects Portal SSD-9504-PA-31 (PAE-58834959)

Dear Peter

**Subject: West Wyalong Solar Farm - SSD 9504-PA-31 - Consultation for Scope Development for Independent Environmental Audit**

Thank you for your email dated 30 May 2023 about the West Wyalong Solar Farm Independent Environmental Audit, seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning and Environment.

BCD has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats) and flooding. We offer the following feedback about conditions of development approval and the associated management plans which were prepared in consultation with BCD.

**Actions in the Biodiversity Management Plan**

Please ensure that the actions listed in Tables 4-1 and 4-2 (Operation) have been implemented where required.

**Conditions**

Schedule 3, Condition 8. Vegetation buffer - Ensure the vegetation buffer has been planted and that it is being maintained with appropriate weed management.

If you have any questions regarding this advice, please contact Simon Maffei, Senior Project Officer, via [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au) or 02 6022 0619.

Yours sincerely



Andrew Fisher  
21 June 2023

**Senior Team Leader Planning South West, Biodiversity and Conservation Division  
Environment and Heritage Group  
Department of Planning and Environment**



Peter Marshman  
Director  
J2m Systems Pty Ltd  
Email: [peter@j2m.com.au](mailto:peter@j2m.com.au)

Your reference: SSD-9504-PA-31  
Our reference: DOC23/469170

Dear Peter,

**Independent Environmental Audit – State Significant Development – West Wyalong Solar Project – SSD-9504-PA-31**


Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significance Development (SSD). Thank you for the continued opportunity to comment on the project.

In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes Condition 19 for the avoidance of impacts to sites WWSF Bee Tree (#43-4-0058) and the part of site WWSF AS01 (part of #43-4-0057) outside of the development footprint and the requirements for development of a Heritage Management Plan. It is recommended that the Department of Planning and Environment's Compliance Team be contacted ([info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)) to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions regarding these comments, please contact Corey O'Driscoll, Senior Assessments Officer, at Heritage NSW on 6229 7079 and [corey.odriscoll@environment.nsw.gov.au](mailto:corey.odriscoll@environment.nsw.gov.au)

Yours sincerely

**Corey O'Driscoll**  
Senior Assessment Officer  
Heritage NSW  
Department of Planning and Environment  
(As Delegate under National Parks and Wildlife Act 1974)  
Date: 27 June 2023

**From:** Wendy Illingworth Wendy.Illingworth@environment.nsw.gov.au   
**Subject:** RE: Your report West Wyalong Solar Farm SSD 9504  
**Date:** 11 July 2023 at 3:38 pm  
**To:** Peter Marshman peter@j2m.com.au



Hi Peter

Thank you very much.

Regards

Wendy

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**From:** Peter Marshman <peter@j2m.com.au>  
**Sent:** Tuesday, 11 July 2023 3:18 PM  
**To:** Wendy Illingworth <Wendy.Illingworth@environment.nsw.gov.au>  
**Subject:** Re: Your report West Wyalong Solar Farm SSD 9504

Dear Wendy,

Good to talk with you this morning.

I understand that the matter regarding my enquiry to environline (CCMS 202305073) and potential non-compliance with SSD 9504 Schedule 3, Condition 13 has been investigated by DPE and is now considered closed. The matter resulted in an Enforceable Undertaking. Michael Wood, NSW DPE - Compliance, discussed this with me recently, and confirmed there are no outstanding requirements. I will follow up relevant evidence of this during the upcoming independent environmental audit.

Kind regards,

**Peter Marshman**  
Director | QSE Consultant



M: +61 422 925 598 E: [peter@j2m.com.au](mailto:peter@j2m.com.au)  
[www.j2m.com.au](http://www.j2m.com.au) P.O. Box 163, Newport Beach NSW 2106

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On 11 Jul 2023, at 11:05 am, Wendy Illingworth  
<[Wendy.Illingworth@environment.nsw.gov.au](mailto:Wendy.Illingworth@environment.nsw.gov.au)> wrote:

Dear Peter

Thank you for speaking with me this morning.

As discussed this matter was investigated by DPE compliance and Planning Compliance (Michael Wood) in 2021.

As an SSD the carriage of the matter was ultimately given to DPE Planning as lead investigators and DPE compliance South West stepped away.

Could you please reply via email with details of your complaint on 5/7/23 via Enviroline (CCMS 202305073 refers) and any information you may have received in the interim.

Regards

**Wendy ILLINGWORTH**

Compliance and Regulation Officer  
Biodiversity and Conservation – South West  
**Department of Planning and Environment**

**M** 0417443283 **E** [wendy.illingworth@environment.nsw.gov.au](mailto:wendy.illingworth@environment.nsw.gov.au)

[dpie.nsw.gov.au](http://dpie.nsw.gov.au)

PO Box 3  
Narrandera NSW 2700

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

Privacy/Legal disclaimers go here.

Please consider the environment before printing this email.

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<Mail Attachment.eml>



Our ref: HMS ID 2973

Peter Marshman  
Department of Planning and Environment  
PO BOX 404, PARRAMATTA NSW 2124

By email: peter@j2m.com.au

Dear Mr Marshman

**Request for Comment on the Scope Development Independent Environmental Audit for Post approval (SSD-9504-PA-31)**

Thank you for your referral dated 30 May 2023 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal **SSD-9504-PA-31**.

In accordance with our previous correspondence on this project, the subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological deposits. Therefore, no state heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

If you have any questions regarding the above advice, please contact Erin McWhirter, Senior Customer Services Officer at Heritage NSW on 02 9873 8500 or Erin.McWhirter@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads 'Timothy Smith'.

Tim Smith OAM  
Director  
Heritage Assessments  
Heritage NSW  
Department of Planning & Environment  
**As Delegate of the Heritage Council of NSW**  
16/06/2023

## Appendix D: Independent Audit Declaration Form

## Independent Audit Declaration Form


<b>Project Name</b>	West Wyalong Solar Farm
<b>Consent Number</b>	SSD 9504
<b>Description of Project</b>	Solar Farm (Operations)
<b>Project Address</b>	Blands Lane, West Wyalong
<b>Proponent</b>	Lightsource BP
<b>Title of Audit</b>	Operational Independent Environmental Audit – West Wyalong Solar Farm
<b>Date</b>	14 September 2023

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

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

Notes:

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

<b>Name of Auditor</b>	Peter Marshman
<b>Signature</b>	
<b>Qualification</b>	Lead EMS Auditor – Exemplar Global No. 114942
<b>Company</b>	J2M Systems
<b>Company Address</b>	P.O. Box 163 Newport Beach NSW 2106



## Appendix E: Site Inspection Photographs.

## Site Inspection Observations

The following photos were taken during the audit site inspection.



**Photo 1:** Site access gate



**Photo 2:** Main site access track with low spot stabilised crossing.



**Photo 3:** Operation and maintenance office.



**Photo 4:** Installed solar panels.



**Photo 5:** Substation



**Photo 6:** Substation with security and PPE signage.



**Photo 7:** Substation, all-weather access track and perimeter fence on Myers Lane (Left to right).



**Photo 8:** Evidence of vegetative screen plantings



**Photo 9 & 10:** Current rate of growth for vegetation screen plantings and evidence of different plant species planted.



**Photo 11:** Vegetation screen plantings along north-western boundary.

**Photo 12:** Re-use of course woody debris.



**Photo 13:** Emergency Plan available at main site access gate.

**Photo 14:** 2 x 22,500L water tanks for fire-fighting purposes.



**Photo 15:** Revegetation after inundation.

**Photo 16:** Low lying areas remain wet after recent rainfall.



**Photo 17:** Revegetation of ground cover and die-back of weeds following spraying.



**Photo 18:** General site conditions.



**Photo 19:** Permanent no-go exclusion fencing and signage.



**Photo 20:** Perimeter fence and safety signage.



**Photo 21:** General example of APZ and access trail.



**Photo 22:** Weather station and vegetative screen.



**Photo 23:** Low-lying access track crossing allowing water flow.



**Photo 24:** Former construction compound recently demobilised and awaiting rehabilitation.



**Photo 25:** Myers Lane access gate.



**Photo 26:** Clearing completed in Myers Lane



**Photo 27:** Causeway on Blands Lane. Road upgrade not yet completed.



**Photo 28:** General condition of Blands Lane.



**Photo 29:** Incomplete works on Blands Lane.



**Photo 30:** Incomplete works on Bodells Lane



**Photo 31:** Bodells Lane with traffic control signage.



**Photo 32:** Bodells Lane and Newell Highway intersection.

## Appendix E: Changes following issue of draft IEA report.

## Changes following issue of draft IEA report.

The following table outlines changes to this report following review and acceptance by LSbp of a draft report for comment:

Audit Report Section	Original audit finding	LSbp review comments / Additional information	Outcome of change
<b>4.2 Recommendations and Opportunities for improvement</b>	<b>Opportunity for Improvement #5:</b> The project website currently provides a link to the superseded Traffic Management Plan (Rev 4) rather than the approved Traffic Management Plan (Rev 5). Documentation on the website is required to be maintained in accordance with Schedule 4, Condition 7 of the Development Consent (Mod 2).	LSbp took action to rectify this issue immediately and the project website has been updated at the time of finalizing this report to include all current, approved management plans (as review 13 September 2023). This OFI is considered closed.	OFI considered closed. Note added to section 4.2 of the IEA report.  Section 5 updated to reflect closed OFI.