



Independent DPE Compliance Audit

SSD-9874 – Walla Walla Solar Farm

Trigalana Environment Pty Ltd

23 June 2023



Independent DPE Compliance Audit

SSD – 9874 Walla Walla Solar Farm

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Executive Summary

Trigalana Environmental Pty Ltd has been engaged to undertake an independent audit of Walla Walla Solar Farm, which consists of the construction of a 300 megawatt (MW), alternating current (AC), photovoltaic (PV) solar farm, located approximately 4.3 kilometres (km) north-east of Walla Walla and 10 km southwest of Culcairn in southern NSW. FRV Services Australia (FRV) are the Proponent, Gransolar are the Construction Contractor.

Infrastructure Approval (SSD-9874) was granted on the 27 November 2020 and was modified on the 3rd of March 2022 and 5th August 2022 to accommodate an increase in solar panel height and project layout changes.

SSD-9874 covers both the construction and operational phases of the Project and requires independent audits to be undertaken in accordance with the Department of Planning and Environments (DPE) Independent Post Approval Requirements (2020).

The audit covers the pre-construction, site establishment and early construction activities for the period from the commencement of construction until the 24th of April 2023. The audit included a site inspection, consultation with relevant project stakeholders and a review of management plans, project documents and site -records.

The site inspection was undertaken on the 24th of April 2023 with members of Gransolar present.

The findings of the audit are:

- Preconstruction obligations as required by the Infrastructure Approval have been completed.
- Key environmental issues are being managed effectively with key mitigations summarised below:
 - Erosion, sediment, and dust controls consisting of stabilised site access, street sweeper and water cart for dust suppression.
 - Limits of disturbance, endangered ecological communities and habitat trees were clearly marked in the field to prevent unauthorised clearing.
 - Nest boxes had been installed prior to construction.
 - Permanent landscaping planting and visual screening was constructed.
 - Site entrance, road upgrade and signage has been installed and approved by Council.
- Preconstruction obligations have been fulfilled including:
 - DPE approval for construction phase environmental management plans.
 - Retirement of Biodiversity Credits.
 - Salvage of aboriginal heritage items.
 - Execution of Voluntary Planning Agreement with Greater Hume Shire Council.

Two non-compliances have been recorded by the audit relating to:

- The project website is not up to date with the information required by Schedule 4 Condition 15.
- Formal notification of construction commencement to DPE (has been noted by DPE as a non-compliance).

Recommendations to address the non-compliances are provided below as well as several additional recommendations aimed at strengthening existing environmental management processes.

1 Introduction

1.1 Project Description

Australian solar developer, FRV Services Australia (FRV), is developing a utility scale solar farm near Walla Walla, approximately 40 km north of Albury in NSW. The project is currently in the construction phase, with the Development Application receiving development consent from the Independent Planning Commission in November 2020 with two modifications granted on the 3rd of March 2022 and 5th August 2022 to accommodate an increase in solar panel height and project layout changes.

When completed, the development footprint will occupy around 493 hectares (ha) of the 605 ha Project site. The Project would involve the construction of a ground-mounted photovoltaic (PV) solar tracking array generating around 300 MW AC of renewable energy. The power generated to be exported to the national electricity grid. Key development and infrastructure components include:

- Approximately 700,000 PV solar arrays mounted on single axis tracking systems.
- Electrical cables and conduits.
- Approximately 76 modular inverter units.
- New TransGrid substation and connection point comprising transformers, associated switchgear, control, and protection equipment.
- 33 kV/330 kV transformer and protection.
- Operations and maintenance (O&M) building, parking and perimeter fencing.
- Primary access point on Benambra Road.
- Emergency/maintenance access points off Benambra and Schneiders Roads.
- Internal access tracks.
- Reactive lighting, CCTV system, security fencing.
- Vegetative screening and setbacks.

The location of the Project is shown in Figures 1 and 2.



Figure 1: Project Location – Regional Context



Figure 2: Project Location - Local Context

1.2 Auditor

Trigalana Environmental Pty Ltd has been appointed to undertake this independent environmental audit. The Auditor was approved by the Department of Planning and Environment. Details of the Auditor are provided in Table 1.

Table 1: Auditor Details

Name	Qualifications	Key Experience
Richard Peterson	B. E Civil M. Environmental Management Management Systems Auditing Leading Management Systems Audit teams Exemplar Global Auditor	25 years of environmental management experience in the infrastructure sector. Have undertaken over 100 audits including independent DPE audits for major infrastructure projects including: <ul style="list-style-type: none"> • EnergyConnect • Crudine Ridge Windfarm • Sapphire Windfarm • Rye Park Windfarm • Albion Park Bypass • Warrell Creek to Nambucca Heads • Northern Road upgrade • Tweed Valley Hospital • Windsor Bridge

The DPE Letter of approval for the auditor is provided in Appendix A.

1.3 Audit Objectives

The key objective of the Independent Environmental Audit was to assess compliance of the Project with the Ministers Conditions of Approval (MCoA) (SSD 9874 – MOD-2) and the implementation of management plans as outlined in the MCoA. The audit is to recognise good practices while providing practical and reasonable recommendations for improvement that can be implemented throughout the project as construction accelerates.

1.4 Audit Scope and Period

This audit has been undertaken in accordance with Schedule 4, Condition 9 of the Ministers Conditions of approval as outlined below.

Table 2: Independent Audit – Requirements

Condition Reference	Condition	Comment
Sch 4 -9	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.	This audit was undertaken on 24th of April 2023 Construction commenced on 24 th January 2023. The audit was undertaken within 3 months of the commencement of construction.

This is the first independent audit for Walla Walla Solar Farm and covers the period from the commencement of construction on 24 January 2023 to the 24th of April 2023.

2 Audit Methodology

2.1 Scope Development

The audit scope was developed in consideration of:

- The NSW Department of Environment Independent Audit Post Approval Requirements (May 2020).
- Project Conditions of Approval (SSI 9874) as modified dated 15 April 2021.
- Stakeholder feedback from relevant government stakeholders including:
 - Department of Planning and Environment.
 - Environment Protection Authority.
 - Biodiversity Conservation Division.
 - Heritage NSW.
 - Local Aboriginal Land Council.
 - Greater Hume Shire Council.
 - DPE Water.
 - Transport for NSW.

2.2 Stakeholder Consultation – Key Issues

In undertaking the audit, key issues raised by the government agencies and aboriginal stakeholder groups that are relevant to the audit are provided in Appendix D.

2.3 Summary of Audit Processes

To complete the audit, the following was undertaken:

- Opening Meeting.
- Site inspection, noting environmental practices and controls.
- Audit interviews.
- Review of documents and records.
- Closing meeting.

2.4 Opening Meeting

An opening meeting was held on 19th of April where the auditor provided an overview of the audit process and confirmed the agenda for the audit.

2.5 Site Inspection

A site inspection was undertaken on the morning of Monday 24th of April 2023. The weather was warm and dry.

The project was in early stages of development with activities completed or underway including:

- Establishment of construction site compound.
- Visual screening/permanent landscaping.
- Permanent drainage and culvert construction.
- Permanent boundary fencing.
- Intersection upgrade to Benambra Rd.
- Clearing, mulching and stockpiling mulch materials.
- Minor earthworks and materials management.
- Construction of internal access roads.

Environmental protection measures observed during the site inspection are summarised in Table 3

Table 3: Site Inspection (Environmental Measures) Summary

Key Environmental Issues	Mitigation Measures Employed
Biodiversity	<ul style="list-style-type: none"> • Nest boxes installed • Permanent chainwire boundary fencing (not barbed wire) • Exclusion zone fencing • Exclusion Zone signage • Habitat trees marked and taped • Trees marked for clearing • No stockpiling or storage within dripline of trees observed • Biodiversity plantings (endemic species)
Soil and Water Management	<ul style="list-style-type: none"> • Permanent drainage infrastructure • Stabilised site access and hardstand • Sealed internal roads • Stockpiles revegetated to provide groundcover • Sediment fences and bunds around stockpiled material • Rumble grid at site entry/egress
Dust	<ul style="list-style-type: none"> • Stabilised site access and internal access roads • Water cart
Traffic and Access	<ul style="list-style-type: none"> • Speed Restriction signage • Truck warning signage on Benambra Road
Heritage	<ul style="list-style-type: none"> • Heritage items salvaged prior to commencement
Waste and Chemicals	<ul style="list-style-type: none"> • Designated concrete washout pit • Bunded chemical storage container • Spill kits provided in accessible locations. • Waste and recycling storage bins
Landscape and Visual	<ul style="list-style-type: none"> • Landscape plantings at boundary fence • Retained vegetation

2.6 Document Review

In undertaking the audit, a broad range of documents were reviewed or referred to including:

- Project conditions of approval (SSD-9874) as modified.
- Project Environmental Impact Statement.
- Environmental Management Plans, developed in accordance with the Project Conditions.
- Correspondence with relevant authorities.
- Specialist reports.
- Incident and complaints registers.
- Records of implementation of the environmental management plans including checklists, inspection reports, waste records etc.

2.7 Closing Meeting

The closing meeting was held on 31st of May 2023 where the summary of the audit findings was provided, noting areas of good practice and recommendations for improvement.

2.8 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in Table 4 and as described in the DPE 2020 Auditing Post Approval Requirement.

Table 4 Compliance Descriptors

Status	Description
Compliant (C)	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed
Non- Compliant (NC)	One or more specific elements of the conditions or requirements have not been complied with 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 was undertaken

3 Audit Findings

3.1 Non-Compliances and Audit Recommendations

Two non-compliances were identified by the audit. The non compliances are presented below in Table 5.

In addition to the non-compliances, several recommendations are also made to further strengthen systems and processes to minimise the risk of an incident or noncompliance.

Table 5 Audit Findings and Recommendations

Ref	Condition	Condition	Audit Finding	Recommendation
1	S 4-4	<p>Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	Non-Compliant	For further notifications to the Department, allow additional time so the Department are fully aware and have appropriate resources allocated in the event of a complaint or if any issues arise.
2	S 4-15	<p>The Applicant must;</p> <p>a) Make the following information publicly available on its website as relevant to the stage of the development;</p> <ul style="list-style-type: none"> • The EIS; • The final layout plans for the development; • Current statutory approvals for the development; • Approved strategies, plans or programs required under the conditions of this consent; • The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • Provide a 24hr telephone line and instruction as to how complaints or enquiries about the development can be made; • A complaints register; • Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • Any other matter required by the Planning Secretary; and <p>Keep this information up to date.</p>	Non-Compliant	Update the project website to include the complaints register and the final layout plans as required by this condition. The website will need to be updated to include this audit report and the Proponents response to the audit report when it is available.
3	S 3-9	<p>The Applicant must ensure;</p> <p>a) The internal roads are constructed as all weather roads;</p> <p>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;</p>	Compliant	<p>Update the Driver Code of Conduct to include the following requirements as required by the MCoA:</p> <ul style="list-style-type: none"> • no parking to occur on the

Ref	Condition	Condition	Audit Finding	Recommendation
		c) The capacity of the existing roadside drainage network is not reduced; d) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and Development related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network.		public road network in the vicinity of the site <ul style="list-style-type: none"> • All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction • Approved access route to the site via Olympic Highway and Benambra Road
4	S3 - 27	The Application must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Compliant	Install appropriate signage at the concrete washout pit to ensure workers are aware of the correct location for the washout of their concrete chutes
5	S3 - 28	The Applicant must; <ul style="list-style-type: none"> a) Minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater; Soils and Construction</i> (Landcom, 2004) manual, or its latest version; b) Ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site; c) Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and Ensure all works are undertaken in accordance with the <i>Guidelines of Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version, unless DPIE Water agrees otherwise.	Compliant	While the observed practices for soil and water management are deemed appropriate to the current activities and risk profile, construction activities will accelerate resulting in an increase in risk. It is therefore recommended that a Certified Profession in Erosion and Sediment Control (CPESC) is engaged to periodically review the implementation of the Erosion and Sediment Control Plans in the field to ensure ongoing compliance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual.

3.2 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions

No agency notices, orders, penalty notices or prosecutions have been issued to the project to date.

3.3 Summary of Environmental Incidents

A summary of the incidents are summarised in Table 6.

Table 6 Incident Summary

Incident Date	Description	Auditor Comments
5/4/23	Minor hydraulic leak from hose less than 500mL.	The spill was minor and reported to have been cleaned up. No further actions are required other than the ongoing maintenance of plant and equipment to prevent recurrence.
24/23	Landowner entered back creek area to remove straw bales to feed stock and tracked through old creek crossing. Only minor damage to back creek crossing.	The incident was caused by the adjacent landowner.

The incidents were noted as minor in nature and did not cause or threaten any material harm. Accordingly, the incidents were not reported to DPE or other agencies in accordance with Appendix 7 of the conditions of approval.

3.4 Previous Annual Review or Compliance Report Recommendations

Not applicable, as this is the first audit for the project, there were no actions requiring completion. The conditions of approval do not require compliance reports to be prepared.

3.5 Supplementary Approvals and Licences

The current activities do not trigger the requirement for an Environment Protection Licence.

3.6 Community Complaints

During the audit period, nine complaints were received in relation to the following issues:

- Weeds and plantings
- Drainage
- Traffic, truck movements and parking
- Dust, stockpiling of materials
- Vegetation buffer
- Advance notice for works (including piling)
- Night lighting

A register is kept of community complaints that documents the details of the complaint. Sample correspondence with the complainants was reviewed and written responses to complainants were deemed to be appropriate.

The complaints register was not provided on the project website at the time of the audit, and this has been identified as a noncompliance.

3.7 Adequacy of Environmental Management Plans

The management plans implemented for this construction phase have been prepared by suitably qualified personnel and approved by the Department of Planning and Environment following consultation with relevant stakeholders. The plans are technically robust and meet the conditions of approval and other relevant legislative requirements. The management plans are adequate for the current scope of work and were observed to be implemented effectively in the field.

3.8 Assessment of Compliance with Predictions in the Environmental Impact Statement

Based on the observations, audit interviews and records reviews as part of the audit, it may be reasonably concluded that the environmental impacts of construction activities to date are consistent with predictions made in the Environmental Impact Statement noting that:

- The general extent of project disturbance area is shown in:
 - Appendix D of the Environmental Impact Statement (Proposal Maps and Drawings)
 - Appendix 1 of the Development consent (General Layout of the Development).
- It was observed on site that the ground disturbance activities undertaken are generally within the disturbance area described in the EIS with boundary fencing and “no go” signage to prevent work from occurring outside the approved disturbance area.
- There were no observed off-site impacts such as:
 - Evidence or reports of clearing outside the project boundary.
 - Visible dust plumes or emissions.
 - Dust or mud tracking on local roads.
 - Excessive noise or vibration emissions, noting that current activities are at a substantial distance from residential or other sensitive receivers with no complaints received to date.
 - No offsite incidents of fuel, chemical spills, unlawful waste disposal or pollution of waters or complaints received were observed or reported.

3.9 Key Strengths

Key strengths are as follows:

- Erosion and sediment control was a high standard, with internal access roads and permanent drainage work constructed prior to the commencement of earthworks and high risk activities.
- Spoil stockpiles were shaped and formed with vegetative cover and sediment controls (consisting of sediment fences and topsoil berms) around each stockpile.
- A high degree of compliance has been achieved with the Conditions of Approval, with two non-compliances identified.

Appendix A DPE Auditor Approval



Department of Planning and Environment

Mr Rob Beckett
Project Developer
FRV Services Australia Pty Limited
Level 10 1 York Street
Sydney NSW 2000
23/02/2023

Dear Mr Beckett

**Walla Walla Solar Farm (SSD-9874)
Independent Environment Audit – Team approval request**

I refer to your request (SSD-9874-PA-23) submitted to the Department of Planning and Environment (the department) on 20 February 2023 requesting the Secretary's approval of suitably qualified person/s to undertake the Independent Environmental Audit (IEA) and prepare the IEA report for Walla Walla Solar Farm, as required under Schedule 4 condition 9 of SSD-9874 as modified (the consent).

The department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. In accordance with Schedule 4 condition 10 of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Mr Richard Peterson of Trigalana Environmental Pty Ltd or
- Mr Jeremy Mitchell and Ms Bethany Lavers of ECO-Logical Australia.

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

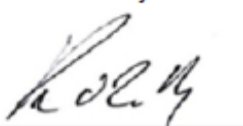
The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

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/s is conditional upon them holding a current certification as a lead or principal auditor with a relevant industry body and all team members being independent of the project.

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.

Should you wish to discuss the matter further, please contact me on 0429400261 or compliance@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance

Appendix B Independent Audit Table

Schedule 2
Part A – Administrative conditions

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
1	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.	<ul style="list-style-type: none"> • Site Observations • Audit Interview • Documents reviewed as part of the audit and noted below 	All reasonable and feasible measures were observed to be implemented on site to control key environmental risks including dust, noise, heritage, water quality erosion and sedimentation and traffic.	Compliant
TERMS OF CONSENT				
2	The Applicant must carry out the development; a) Generally in accordance with the EIS; and b) In accordance with the conditions of this consent. Note: <i>The general layout of the development is shown in Appendix 1.</i>	<ul style="list-style-type: none"> • Site Observations • Audit Interview • Documents reviewed as part of the audit and noted below 	Construction activities were being undertaken generally in accordance with the EIS and in accordance with the conditions of this consent.	Compliant
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.	<ul style="list-style-type: none"> • Site Observations • Audit Interview 	No inconsistencies identified.	Compliant
4	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Departments assessment of: a) Any strategies, plans or correspondence that are submitted in accordance with this consent; b) Any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and	<ul style="list-style-type: none"> • Site Observations • Audit Interview • Documents reviewed as part of the audit and noted below 	DPE comments incorporated into the management plans.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status										
	c) The implementation of any actions or measures contained in these documents.													
INFRASTRUCTURE OFFSET DISTANCES														
5	<p>The Applicant must ensure that the solar panels, substation and inverters within the approved development footprint are not installed closer to the receivers identified in column 1 of Table 1 than the offset distances identified in column 2 of Table 1.</p> <p>Table 1: Development offset requirements</p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Offset Distance</th> </tr> </thead> <tbody> <tr> <td>R1 a</td> <td>210m</td> </tr> <tr> <td>R1 b</td> <td>485m</td> </tr> <tr> <td>R2</td> <td>930m</td> </tr> <tr> <td>R5 a</td> <td>1800m</td> </tr> </tbody> </table>	Receiver	Offset Distance	R1 a	210m	R1 b	485m	R2	930m	R5 a	1800m	<ul style="list-style-type: none"> Site Observations Audit Interview 	Not triggered, the solar panels, substation and inverters have not been installed.	Not triggered
Receiver	Offset Distance													
R1 a	210m													
R1 b	485m													
R2	930m													
R5 a	1800m													
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE														
6	The Applicant may upgrade the solar panels and ancillary infrastructure on site those upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Planning Secretary incorporating the proposed upgrades.	<ul style="list-style-type: none"> Site Observations Audit Interview 	Solar panels have not been installed and therefore no upgrades have been undertaken at this stage in the project.	Not triggered										
STRUCTURAL ADEQUACY														
7	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> .	<ul style="list-style-type: none"> Site Inspection Audit Interview 	The construction of new buildings and structures has not yet commenced.	Not Triggered										

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>Notes:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 			
DEMOLITION				
8	<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 versions.</p>	<ul style="list-style-type: none"> Site Inspection Audit Interview 	<p>There has been no demolition on the project to date with no demolition required.</p>	<p>Not Triggered</p>
PROTECTION OF PUBLIC INFRASTRUCTURE				
9	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must;</p> <ol style="list-style-type: none"> Repair or pay the full costs associated with repairing, any public infrastructure that needs to be relocated as a result of the development. Relocate, or pay the full costs associated with relocating any public infrastructure that needs to be relocated as a result of the development. <p>This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	<ul style="list-style-type: none"> Site Inspection Audit Interview 	<p>There was damage to public infrastructure observed during the site inspection or reported.</p> <p>No public infrastructure required relocation prior the commencement of construction.</p>	<p>Not Triggered</p>
OPERATION OF PLANT AND EQUIPMENT				
10	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development is;</p> <ol style="list-style-type: none"> Maintained in a proper and efficient condition; and 	<ul style="list-style-type: none"> Site Inspection Audit Interview Plant portal record number 1048090 Light vehicle inspection checklist 	<p>All equipment operating on site at the time of the site inspection was observed to be operating in a proper and efficient manner with no visible exhaust or excessive noise. Equipment is maintained appropriately with</p>	<p>Compliant</p>

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	b) Operated in a proper and efficient manner.	April 2023 <ul style="list-style-type: none"> • Equipment induction register 6/4/23 	records kept of onboarding and servicing activities.	
SUBDIVISION				
11	The Applicant may and the applicable authority agree otherwise, the Applicant must; <ul style="list-style-type: none"> a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) Relocate or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which expressly provided for in the conditions of this consent.	<ul style="list-style-type: none"> • Site Inspection • Audit Interview 	No damage to local infrastructure was observed or reported during the audit.	Not triggered
COMMUNITY ENHANCEMENT				
12	Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with; <ul style="list-style-type: none"> a) Division 7.1 of Part 7 of the EP&A Act; and b) The terms of the letter of offer dated 11 September 2020, summarized in Appendix 3. 	<ul style="list-style-type: none"> • FRV Letter of offer dated 11 September 2020 • Planning Agreement between Greater Hume Council and FRV Services Australia Pty Ltd dated 12/12/22 • Novation Deed between FRV Services Australia Pty Ltd and Walla Walla Asset Co Pty Ltd as the trustee for Walla Walla Asset trust and Greater Hume Shire Council 	A letter of offer to Greater Hume Council was made on the 11/9/2020. The Voluntary Planning Agreement (VPA) was executed on 12 th of December 2022. The VPA is for a total value of \$2,028,404 which is consistent with the FRV letter of offer dated 11 September 2020.	Compliant

**Schedule 3
Environmental Conditions – General**

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
BATTERIES				
Battery Storage Restriction				
1	Battery storage is not permitted on the project site. Note: <i>This condition does not prevent the Applicant from seeking to lodge a separate development applicant or modify this consent to permit battery storage in the future.</i>	<ul style="list-style-type: none"> Site Inspection 25/4/23 Audit Interview 	There are currently no plans to construct a battery storage facility at the site.	Compliant
TRANSPORT				
Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions				
2	The Applicant must ensure that the; <ol style="list-style-type: none"> Development does not generate more than; <ul style="list-style-type: none"> 110 heavy vehicle movements a day during construction, upgrading and decommissioning; 13 heavy vehicles requiring escort movements during construction, upgrading and decommissioning; and 5 heavy vehicle movements a day during operations; on public road network; and Length of any vehicles (excluding heavy vehicles requiring escort) used for the development does not exceed 26 metres unless the Planning Secretary agrees otherwise. 	<ul style="list-style-type: none"> Site Inspection 25/4/23 Audit Interview Truck Log dated 13/3/23 	There were no vehicles greater than 26m in length observed to be arriving or departing the site. A record of daily truck movements is kept with 27 vehicles recorded on the 13/3/23.	Compliant
3	The Applicant must keep accurate records of the number of heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.	<ul style="list-style-type: none"> Truck Log dated 13/3/23 	A daily register of truck movements is kept on site.	Compliant
Access Route				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
4	<p>All heavy vehicles requiring escort and heavy vehicles associated with the development (including water carts) must travel to and from the site via Olympic Highway and Benambra Road, as identified in the figure in Appendix 5.</p> <p>Note: <i>The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of heavy vehicles requiring escort on the road network.</i></p>	<ul style="list-style-type: none"> Site Inspection Audit interview 	<p>The vehicle route has been included in the Driver Code of Conduct.</p> <p>There have been no instances reported to date of non-compliance with the approved vehicle route.</p>	Compliant
Site Access				
5	All vehicles associated with the development must enter and exit the site via the Main Access point on Benambra Road, as identified in Appendix 1.	<ul style="list-style-type: none"> Site Inspection 	The main access point identified in Appendix 1 is the only feasible access to the site with the retained vegetation and fencing preventing access from other locations. All vehicles were observed to be entering and exiting the nominated points during the site inspection.	Compliant
6	<p>The following vehicles may also use the Substation Access point on Benambra Road, as identified in Appendix 1:</p> <ol style="list-style-type: none"> Heavy vehicles requiring escort transporting substation components; Light vehicles travelling from the west associated with the construction of the substation; and Vehicles associated with the operation of the substation. 	<ul style="list-style-type: none"> Site Inspection 	Only light vehicles were observed to be utilising the substation access point on Benambra Road. Substation components were not being delivered or installed at the time of the audit.	Compliant
Road Upgrades				
7	<p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must construct:</p> <ol style="list-style-type: none"> The Main Access point and Substation Access point on Benambra Road, as identified in Appendix 1, with Rural Property Access type treatments and to cater for the largest vehicle accessing the site; Four vehicle crossing access points on Schneiders Road, as identified in Appendix 1; The access points stipulated in (a) and (b) above; <ul style="list-style-type: none"> In accordance with the <i>Austroads Guide to Road Design</i> (as amended by TfNSW supplements); and 	<ul style="list-style-type: none"> Gransolar email to Greater Hume Council dated 10/1/23 Greater Hume Council Email dated 21/4/23 Benambra Road intersection drawing TGS Number G23-0317 Version 001 dated 13/3/23 Benambra Road Main 	Construction of the main access point and the substation access points were completed in 2022 prior to the commencement of construction.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> To the satisfaction of Council. 	Entrance Drawing drawing TGS Number G23-0316 Version 001 dated 13/2/23		
Road Maintenance				
8	<p>The Applicant must;</p> <p>a) Undertake an independent dilapidation survey to assess the;</p> <ul style="list-style-type: none"> Existing condition on Benambra Road on the transport route including the intersection with the Olympic Highway and the crossing of Schneiders Road, prior to construction, upgrading or decommissioning works; and Condition of Benambra Road on the transport route including the intersection with the Olympic Highway and the crossing of Schneiders Road, following construction, upgrading or decommissioning works; <p>b) Repair Benambra Road on the transport route including the intersection with the Olympic Highway and the crossing of Schneiders Road if dilapidation surveys identify the road has been damaged during construction, upgrading or decommissioning works;</p> <p>In consultation with the relevant roads authority, to the satisfaction of the Planning Secretary.</p>	<ul style="list-style-type: none"> Walla Walla Australia, Dilapidation Survey Report, Doc No WAL-GRS-PM-RPT-001 Rev A1 dated 08/9/22 DPE Letter dated 22/12/22 	<p>The dilapidation report was undertaken in September 2022, prior to the commencement of construction activities on the 24/1/23. The survey included:</p> <ul style="list-style-type: none"> Existing condition on Benambra Road on the transport route including the intersection with the Olympic Highway and the crossing of Schneiders Road, prior to construction, upgrading or decommissioning works. <p>DPE approved the Pre-Construction Dilapidation Survey noting that it:</p> <ul style="list-style-type: none"> was prepared in consultation with Greater Hume Council. contains the information required by the conditions of consent. <p>The survey will need to be undertaken following construction to assess any damage to roads during the construction phase.</p>	Compliant
Operating Conditions				
9	<p>The Applicant must ensure;</p> <p>e) The internal roads are constructed as all weather roads;</p> <p>f) There is sufficient parking on site for all vehicles, and</p>	<ul style="list-style-type: none"> Site Inspection Incident Register Weekly environmental 	<p>Internal access roads were constructed as an early project activity to ensure internal stabilised access routes and to avoid excessive rutting and soil disturbance. Site</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>no parking occurs on the public road network in the vicinity of the site;</p> <p>g) The capacity of the existing roadside drainage network is not reduced;</p> <p>h) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</p> <p>i) Development related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network.</p>	<p>checklist 24/3/23</p> <ul style="list-style-type: none"> Drivers Code of Conduct – Revision A dated 4/4/23 	<p>entry and egress points were properly constructed with rumble grids in place. There were no vehicles observed to be leaving the site during the audit inspection. The drivers code of conduct includes a requirement for all drivers to ensure the cleanliness of the vehicle and must inspect for loose material, dirt etc prior to leaving the site</p> <p>Weekly inspections are undertaken of local roads with no tracking of dirt or mud observed during the audit site inspection.</p> <p>Recommendation</p> <p>It is recommended the Driver Code of Conduct is updated to include the following requirements as required by the MCoA:</p> <ul style="list-style-type: none"> and no parking occurs on the public road network in the vicinity of the site. All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction. The approved access route via Olympic Highway and Benambra Road 	
Traffic Management Plan				
10	<p>Prior to commencing construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with TFNSW, Council and Hurricane Hill Hardrock Quarry, and to the satisfaction of the Planning Secretary in writing. This plan must include;</p> <p>a) Details of the transport route to be used for all development related traffic;</p> <p>b) Details of the road upgrade works required by Condition 7 of Schedule 3 of this consent;</p> <p>c) Details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including;</p>	<ul style="list-style-type: none"> DPE Letter dated 23/11/22 	<p>DPE approved the Traffic Management Plan on 23/11/22 noting that it:</p> <ul style="list-style-type: none"> has been prepared in consultation with Transport for NSW, Greater Hume Shire Council and Hurricane Hill Hardrock Quarry. contains the information required by the conditions of approval. 	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> • Details of the dilapidation surveys required by condition 8 of Schedule 3 of this consent; • Temporary traffic controls, including detours and signage; • Notifying the local community about development-related traffic impacts; • Procedures for receiving and addressing complaints from the community about development related traffic; • Minimising potential cumulative traffic impacts with other State significant development projects in the area, including other nearby solar farms and Hurricane Hill Quarry; • Minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network; • Minimising dirt tracked onto the public road network from development related traffic; • Details of the employee shuttle bus service, including pick up and drop off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • Encouraging car-pooling or ride sharing by employees; • Scheduling of haulage vehicle movements to minimise convoy length or platoons; • Responding to local climate conditions that may affect road safety such as fog, dust, wet weather, and flooding; • Responding to any emergency repair or maintenance requirements; and • A traffic management system for managing heavy vehicles requiring escort; <p>d) A drivers code of conduct that addresses;</p> <ul style="list-style-type: none"> • Driver fatigue; • Procedures to ensure that drivers implement safe driving practices; <p>e) A program to ensure drivers working on the</p>			

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>			
LANDSCAPING				
Vegetation Buffer				
11	<p>The Applicant must establish and maintain a vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Planning Secretary. The landscape screening must;</p> <ol style="list-style-type: none"> Be planted prior to commencing construction, or by 31 July 2022, whichever is the later; Be comprised of species that that are endemic to the area; Minimise views from receivers R1a, R1b, R2 and R5a within 3 years of commencing operations; Be designed and maintained in accordance with RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); and Be properly maintained with appropriate weed management <p>Unless the Planning Security agrees otherwise.</p>	<ul style="list-style-type: none"> Site inspection Photo 6 Walla Walla Solar Farm Landscaping Plan 	<p>Landscape planting had been implemented at the time of the audit inspection. Gransolar confirmed the species planted are noted in Table 9.1 as "being derived from the General Native Vegetation Profile: Walla Walla District published in the South West Revegetation Guide (DLWC) 1998) and in consultation with Holbrook Landcare Network and Jayfields Nursery.</p> <p>Section 6 of the Landscaping plan provides details of setback distances to the solar panels.</p>	Compliant
Landscaping Plan				
12	<p>Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with receivers R1a, R1b, R2 and R5a, to the satisfaction of the Planning Secretary in writing. This plan must include;</p> <ol style="list-style-type: none"> A description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 11 (a)-€-, above; A program to monitor and report the effectiveness of these measures; and Details of who would be responsible for monitoring, reviewing and implementing the plan; and timeframes 	<ul style="list-style-type: none"> Landscaping Plan, Walla Walla Solar Farm SSD -9874, April 2022 DPE Letter dated 5/5/22 Site Inspection 	<p>NGH have prepared the landscaping plan for the project which includes: Details of consultation with Receivers R1, R2 and R5a. DPE Approved the Landscaping plan on the 5/5/22.</p> <p>Implementation of the landscaping plan was observed, including the planting of perimeter trees to provide visual screening and the retention of existing vegetation at the project boundary.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	for the completion of actions. Following the Planning Secretary's approval, the Applicant must implement the Landscaping Plan.			
LAND MANAGEMENT				
13	The Applicant must maintain the agricultural land capacity of the site, including; <ul style="list-style-type: none"> a) Establishing the ground cover of the site within 3 months following completion of any construction or upgrading; b) Properly maintaining the ground cover with appropriate perennial species and weed management; c) Maintaining grazing within the development footprint following construction where possible; Unless the Planning Secretary agrees otherwise.	NA	Condition won't be triggered until the completion of construction.	Not triggered
BIODIVERSITY				
Vegetation Clearance				
14	The Applicant must not clear any native vegetation or fauna habitat located outside the approved development footprint shown in Appendix 1.	<ul style="list-style-type: none"> • Site Inspection • Incident Register • EIS Project Boundary Maps 	There was no observed clearing outside the project boundary footprint. Controls to prevent unauthorised clearing included boundary fencing, "No Go" Signage and fencing.	Compliant
Biodiversity Offsets				
15	Prior to commencing construction, the Applicant must retire biodiversity credits of a number and class specified Table 1 and Table 2 below, unless the Planning Secretary determines otherwise in consultation with BCD. The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offset Scheme</i> and can be achieved by: <ul style="list-style-type: none"> a) Acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; b) Making payments into an offset fund that has been developed by the NSW Government; or 	<ul style="list-style-type: none"> • Letter from Biodiversity Conservation trust dated 12/12/22 	The letter from Biodiversity Conservation trust states " <i>The Trust confirms that the following payments have been made into the Biodiversity Conservation Fund under section 6.30(1) of the Act to satisfy an obligation to retire biodiversity credits</i> ". The total value of credits retired is \$1,634,466.86".	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																									
	<p>c) Funding a biodiversity conservation action that benefits the entirety 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="277 416 943 700"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>River Red gum herbaceous grassy very tall open forest wetland</td> <td>5</td> <td>28</td> </tr> <tr> <td>Western Grey Box Tall grassy woodland</td> <td>76</td> <td>298</td> </tr> <tr> <td>Blakelys Red Gum – Yellow Box Tall Grassy Woodland</td> <td>277</td> <td>13</td> </tr> <tr> <td>Riparian Blakelys Red Gum – box-shrun- sedge- tall open forest</td> <td>278</td> <td>2</td> </tr> </tbody> </table> <p>Table 2: Species Credit Requirements</p> <table border="1" data-bbox="277 783 907 963"> <thead> <tr> <th>Species Credit Species</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Squirrel Glider</td> <td>182</td> </tr> <tr> <td>Little Eagle</td> <td>135</td> </tr> <tr> <td>Southern Myotis</td> <td>97</td> </tr> <tr> <td>Pine Donkey Orchid</td> <td>77</td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	River Red gum herbaceous grassy very tall open forest wetland	5	28	Western Grey Box Tall grassy woodland	76	298	Blakelys Red Gum – Yellow Box Tall Grassy Woodland	277	13	Riparian Blakelys Red Gum – box-shrun- sedge- tall open forest	278	2	Species Credit Species	Credits Required	Squirrel Glider	182	Little Eagle	135	Southern Myotis	97	Pine Donkey Orchid	77			
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16	<p>Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with the BCD, and to the satisfaction of the Planning Secretary in writing. This plan must;</p> <p>a) Include a description of the measures and timeframes that would be implemented for;</p> <ul style="list-style-type: none"> • Protecting vegetation and fauna habitat outside the approved disturbance areas; • Managing the remnant vegetation and fauna habitat on site; • Minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and 	<ul style="list-style-type: none"> • Biodiversity Management Plan, Walla Walla Solar Farm dated 22/12/22 • DPE Letter dated 12/1/23 • Preclearing Survey Report for Gransolar – February 2023 • Site Inspection 	<p>DPE approved the biodiversity on the 12/1/23 noting that the Plan:</p> <ul style="list-style-type: none"> • has been prepared in consultation with the Departments Biodiversity, Conservation and Science Directorate. • contains the information required by the conditions of approval. <p>Narla Environmental has been engaged as the project ecologist. Prior to clearing Narla undertook a pre-clearing inspection and prepared a comprehensive report that detailed</p>	Compliant																									

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>operation of the development;</p> <ul style="list-style-type: none"> • Minimising the impacts to fauna on site and implementing fauna management protocols; • Avoiding the removal of hollow bearing trees during spring to avoid the main breeding period of hollow dependent fauna; • Rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; • Maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or rehabilitation of the site; and • Controlling weeds, feral pests and pathogens; <p>b) Include a program to monitor and report on the effectiveness of mitigation measures; and</p> <p>c) Include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management plan.</p> <p>Note: <i>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 Biodiversity Stewardship Agreement.</i></p>		<p>findings relating to the following ecological aspects:</p> <ul style="list-style-type: none"> • Habitat trees • Threatened flora • Threatened fauna • Nocturnal surveys • Priority weeds <p>Evidence of implementation of the biodiversity plan observed in the field included nest boxes, no go signage and fencing to prevent impacting protected vegetation as well as tree markings to ensure correct tree removal. There was no proliferation of weeds observed on site.</p> <p>Narla have been retained by Gransolar to provide ongoing advice for small scale/ad hoc clearing activities.</p>	
AMENITY				
Construction, Upgrading and Decommissioning Hours				
17	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between;</p> <ol style="list-style-type: none"> a) 7am to 6pm Monday to Friday; b) 8am to 1pm Saturdays; and c) At no time on Sundays and NSW public holidays. <p>The following construction upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary;</p> <ul style="list-style-type: none"> • The delivery of materials as requested by the NSW 	<ul style="list-style-type: none"> • Site Inspection • Audit Interview • Incident register 	<p>All works have been undertaken within approved working hours, no OOH work has been undertaken to date. There have been no complaints relating to OOH work.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> Police Force or other authorities for safety reasons; or Emergency work to avoid the loss of life, property and/ or material harm to the environment. 			
Noise				
18	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or it's latest version.	<ul style="list-style-type: none"> Site Inspection Incident register 	<p>Construction Noise and Vibration management plan prepared. Reasonable and feasible measures observed on site.</p> <p>No rock breaking, blasting or impulsive noise observed during the site inspection.</p> <p>No noise complaints received to date.</p>	Compliant
19	The Applicant must appoint a neighbour liaison officer to liaise with receivers on construction noise levels and, in particular, consult with R5a (Orange Grove Gardens) regarding its construction schedule.	<ul style="list-style-type: none"> Audit interview 	The Gransolar Project Manager has been appointed as the neighbor liaison officer.	Compliant
Dust				
20	The Applicant must minimise the dust generated by the development.	<ul style="list-style-type: none"> Site inspection 	<p>Measures to minimise dust include the following:</p> <ul style="list-style-type: none"> Stabilised site access Hardstand laydown areas Water cart Speed restrictions on internal access roads <p>These measures are deemed appropriate for managing dust on site.</p>	Compliant
21	The Applicant must apply dust mitigation measures to Benambra Rd between Weeamara Rd and the entrance to the substation for the duration of the construction period of the substation, with the objective of minimising dust impacts associated with the development on R1a and R1b.	<ul style="list-style-type: none"> Site inspection 	A water cart is available for use at this location. No dust issues were identified during the audit site inspection.	Compliant
Visual				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
22	The Applicant must; <ol style="list-style-type: none"> a) Minimise the off site visual impacts of the development, including the potential for any glare or reflection; b) Ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and c) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes. 	<ul style="list-style-type: none"> • Site Inspection 	There were no advertising or logos observed on site.	Compliant
Lighting				
23	The Applicant must; <ol style="list-style-type: none"> a) Minimise the off site lighting impacts of the development; and b) Ensure that any external lighting associated with the development; <ul style="list-style-type: none"> • Is installed as low intensity lighting (except where required for safety or emergency purposes); • Does not shine above the horizontal; and • Complies with <i>Australian/ New Zealand Standard AS/ NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version. 	<ul style="list-style-type: none"> • Site Inspection • Audit interview 	There was no lighting installed that would result in obtrusive impacts to nearby residential receivers. The only lighting installed on site is security and office lighting for the purposes of arrival and departure of workers during the winter months.	Compliant
HERITAGE				
Protection of Heritage Items				
24	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 6 or any Aboriginal heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological</i>	<ul style="list-style-type: none"> • Heritage Management Plan, Walla Walla Solar Farm, October 2022, NGH 06/10/22 • Gransolar email to FRV dated 23/1/23 • Audit Interview 	Gransolar email confirms the artefacts were collected from the first site visit to site with the RAPS & NGH, the collected artefacts have been moved off site by NGH & the RAPS to allow for construction to begin. NGH are storing the artefacts until a return to country ceremony has been undertaken. The process for analysing the material and completing the impact site cards on AHIMS commenced in	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p><i>Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version. Note: <i>The location of the Aboriginal heritage items referred to this condition are shown in the figure in Appendix 6.</i></p>		January 2023.	
Heritage Management Plan				
25	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary in writing. This plan must;</p> <ol style="list-style-type: none"> a) Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary in writing; b) Be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; c) Include a description of the measures that would be implemented for; <ul style="list-style-type: none"> • Protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6; • Salvaging and relocating the Aboriginal heritage items located within the approved development footprint, including subsurface salvage in PAD2 as identified in Table 2 of Appendix 6; • Avoidance of the potential hearth in PAD1; • A contingency plan and reporting procedure if; <ul style="list-style-type: none"> - Previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; • Ensuring workers on site receive suitable heritage inductions prior to carrying out any 	<ul style="list-style-type: none"> • Heritage Management Plan, Walla Walla Solar Farm, October 2022, NGH 06/10/22 • DPE Letter dated 18/11/22 	<p>DPE approved the Heritage Management Plan on the 18/11/2022 noting the Heritage Management Plan:</p> <ul style="list-style-type: none"> • has been prepared in consultation with Heritage NSW. • contains the information required by the consent. <p>Gransolar have appointed heritage consultants NGH to oversee the implementation of the plan and provide technical advice. Prior to the commencement of construction, heritage items were salvaged, stored and catalogued. The registration of heritage items on the AHIMS register has been initiated.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>development on site, and that records are kept of these inductions; and</p> <ul style="list-style-type: none"> • Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and <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 Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>			
SOIL AND WATER				
Water Supply				
26	<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>Note: <i>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>	<ul style="list-style-type: none"> • Greater Hume Council email dated 13/4/23 	<p>Water for construction purposes is supplied from Greater Hume Council under a billing arrangement.</p>	Compliant
Water Pollution				
27	<p>The Application must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	<ul style="list-style-type: none"> • Site Inspection 24/4/23 • Soil and Water Management Plan, Walla Walla Solar Farm, NGH April 2023 	<p>All operating areas were inspected, and it was observed:</p> <ul style="list-style-type: none"> • Erosion and Sediment controls have been installed and maintained. • Chemicals and fuels were securely stored in bunded containers and away from drainage lines and waterways. • There was no observed evidence of pollution, noting that only one minor incident occurred during the audit period. • Weekly inspections. • A designated pit is available on site 	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			<p>for washout of concrete trucks.</p> <p>Recommendation</p> <p>It is recommended that appropriate signage is installed at the concrete washout pit site to ensure workers are aware of the correct location for the washout of their concrete shute.</p>	
Operating Conditions				
28	<p>The Applicant must;</p> <p>d) Minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater; Soils and Construction</i> (Landcom, 2004) manual, or its latest version;</p> <p>e) Ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site;</p> <p>f) Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>g) Ensure all works are undertaken in accordance with the <i>Guidelines of Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version, unless DPIE Water agrees otherwise.</p>	<ul style="list-style-type: none"> • Site Inspection 24/4/23 • Soil and Water Management Plan, Walla Walla Solar Farm, NGH April 2023 • Weekly environmental checklist 24/3/23 	<p>Gransolar have prepared and implemented a Soil and Water Management Plan to ensure erosion is minimised and water pollution is prevented. Measures observed during the site inspection include:</p> <ul style="list-style-type: none"> • Stockpiles were trimmed, less than 2m high and rehabilitated with grass to prevent runoff. • Stabilised site access and internal access roads. • Earth bunds. • Retained vegetation to provide groundcover. • Hardstand laydown areas. • Sediment fences. • Water cart. • Weekly ERSED inspections. <p>Recommendation</p> <p>While the observed practices for soil and water management are deemed appropriate to the current activities and risk profile, construction activities will accelerate resulting in an increase in risk. It is therefore recommended that a Certified Profession in Erosion and Sediment Control (CPESC) is engaged to periodically review the implementation of the</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Erosion and Sediment Control Plans in the field to ensure ongoing compliance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual.	
HAZARDS				
Safety Management Study Required				
29	<p>Prior to commencing the construction, unless the Planning Secretary agrees otherwise, the Applicant must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline and to the satisfaction of the Planning Secretary. The study must include an assessment of potential electrical hazards, and must be consistent with the <i>Australia Standard for 2885 for Pipelines – Gas and Liquid Petroleum and Australian Standard 4853-2012 – Electrical Hazards on Metallic Pipelines</i>.</p> <p>Following the Planning Secretary's approval, the Applicant must implement measures described in the Safety Management Study.</p>	<ul style="list-style-type: none"> AS 2885.6 Safety Management Study Workshop & Report, Revision 0, dated 7/2/22 DPE Letter dated 23/5/22 	DPE approved the Safety Management Study subject to the Applicant completing all actions in Table 8 of the Safety Management Study in a timely manner and to the satisfaction of APA.	Compliant
Storage and Handling of Dangerous Goods				
30	<p>The Applicant must store and handle all chemicals, fuels and oils used on site in accordance with;</p> <ol style="list-style-type: none"> The requirements of all relevant Australian Standards; and The NSW EPA's <i>Storing and Handling of Liquids; Environmental Protection – Participants Handbook</i> if the chemicals are liquids. <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<ul style="list-style-type: none"> Site Inspection 	Only minor volumes of fuels and chemicals were stored on site. Fuels and chemicals were stored in appropriately bunded areas with spill kits available to clean up any spills.	Compliant
Operating Conditions				
31	<p>The Applicant must;</p> <ol style="list-style-type: none"> Minimise the fire risks of the development, including managing vegetation fuel loads on site; 	<ul style="list-style-type: none"> NA 	Condition won't be triggered until the commencement of operation.	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>b) Ensure that the development;</p> <ul style="list-style-type: none"> • Includes at least 10 metre defensible space around the perimeter of the solar array area that permits unobstructed vehicle access; • Manages the defensible space and solar array areas in the Asset Protection Zone; • Complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019 (or equivalent)</i> and <i>Standards for Asset Protection Zones</i>; • Is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65mm Storz fitting on site and a FRNSW compatible suction connection located adjacent to an internal access road; <p>c) Assist the RFS an 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 and RFS following construction of the development, and prior to commencing operations.</p>			
Emergency Plan				
32	<p>Prior to commencing construction, the Applicant must develop a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction for FRNSW and the RFS. The Applicant must keep two copies of the plan on site in a prominent position adjacent to the site entry points at all times. The plan must;</p> <ol style="list-style-type: none"> a) Be consistent with the RFS's <i>Planning for Bushfire Protection 2019 (or equivalent)</i>; b) Identifying the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; c) List works that should not be carried out during a total fire ban; d) Include availability of fire suppression equipment, access and water e) Include availability for the storage and maintenance of 	<ul style="list-style-type: none"> • Walla Walla NSW(Australia) Emergency Response Plan, WAL-GRS-HS-PLN 003 Rev B dated 4/8/22 • Fire Management Plan – Walla Walla Solar Farm, WAL-GRS-HS-PLN 003 Rev C dated 27/9/22 • NSW Rural Fire Service Letter dated 12/11/19 • NSW Fire and 	<p>The Emergency Plan appears to address all items as required by this condition.</p> <p>Appendix 7 of the Emergency Plan includes consultation details with both the RFS and NSW Fire and Rescue. RFS raised no issues with the document. Fire and Rescue NSW confirmed that the documents appear to cover all the areas with regards to Fire and Rescue viewpoint.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>any flammable materials;</p> <p>f) Detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</p> <p>g) Include a figure showing site infrastructure, Asset Protection Zone and the on site water supply tank;</p> <p>h) Include location of hazards (physical, chemical, and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during the fire fighting operations;</p> <p>i) Include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;</p> <p>j) Include bushfire emergency management planning;</p> <p>k) Include details of the how RFS would be notified, and procedures that would be implemented, in the event that;</p> <ul style="list-style-type: none"> • There is a fire on site or in the vicinity of the site; • There are any activities on site that would have the potential to ignite surrounding vegetation; or • There are any proposed activities to be carried out during a bushfire danger period; and <p>l) Offer representatives of the local RFS brigade an opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations.</p>	<p>Rescue Email dated 19/9/22</p> <ul style="list-style-type: none"> • NSW Rural Fire Service Email dated 27/9/22 		
WASTE				
33	<p>The Applicant must;</p> <p>a) Minimise the waste generated by the development;</p> <p>b) Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version);</p> <p>c) Store and handle all waste on site in accordance with its classification;</p>	<ul style="list-style-type: none"> • Site Inspection 	<p>Minimal waste has been produced on the project to date, a water tracking register is kept up to date that includes quantities for various waste classifications.</p> <p>Only non- hazardous waste, wastewater/sewage and office waste has been</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	d) Not receive or dispose of any waste on site; and e) Remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licenced waste facility for disposal.		generated by the project to date. Appropriate waste facilities have been provided on site.	
ACCOMMODATION AND EMPLOYMENT STRATEGY				
34	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 Planning Secretary. This strategy must; <ol style="list-style-type: none"> a) Propose measures to ensure there is sufficient accommodation for the workforce associated with the development; b) Consider the cumulative impacts associated with other State significant development projects in the area; c) Investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and 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. Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.	<ul style="list-style-type: none"> • Walla Walla NSW (Australia), Accommodation and Employment Strategy, Doc No WAL-GRS-HS-PLN 0004 Rev D dated 24/11/22 • DPE letter dated 23/12/22 • Supplier Spreadsheet 	DPE approved the Accommodation and Employment Strategy on the 23/12/2022 noting the Accommodation and Employment Strategy <ul style="list-style-type: none"> • Has been prepared in consultation with Greater Hume Council. • contains the information required by the consent. Worker accommodation is not provided on site. A register of local employment is kept up to date. In summary, 17 suppliers have been engaged by the project to date with 16 of the suppliers local to the area (94.1%).	Compliant
DECOMMISSIONING AND REHABILITATION				
35	Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be reviewed by the Applicant prior to the cessation of the operations, to the satisfaction of the Planning Secretary. The Plan must; <ol style="list-style-type: none"> a) Include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3; b) Describe the measures that would be implemented to; <ul style="list-style-type: none"> • Decommission the development and rehabilitate the site in accordance with the 	<ul style="list-style-type: none"> • N/A 	Not triggered until following operation.	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status										
	<ul style="list-style-type: none"> objectives in Table 3; Minimise and manage the waste generated by the decommissioning of the development; and Include a program to monitor and report on the implementation of these measures against the detailed completion criteria. <p>The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning and Rehabilitation Plan.</p>													
36	<p>Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.</p> <p>Table 3: Rehabilitation Objectives</p> <table border="1" data-bbox="277 786 907 1220"> <thead> <tr> <th data-bbox="277 786 477 810">Feature</th> <th data-bbox="477 786 907 810">Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="277 810 477 962">Site</td> <td data-bbox="477 810 907 962"> <ul style="list-style-type: none"> Safe, stable and non polluting Minimise the visual impact of any aboveground ancillary infrastructure agreed to be retained for an alternative use </td> </tr> <tr> <td data-bbox="277 962 477 1114">Solar farm surface and subsurface infrastructure</td> <td data-bbox="477 962 907 1114"> <ul style="list-style-type: none"> All infrastructure to be decommissioned and removed unless the secretary agrees otherwise All underground cabling is to be removed </td> </tr> <tr> <td data-bbox="277 1114 477 1193">Land Use</td> <td data-bbox="477 1114 907 1193"> <ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) </td> </tr> <tr> <td data-bbox="277 1193 477 1220">Community</td> <td data-bbox="477 1193 907 1220"> <ul style="list-style-type: none"> Ensure public safety at all times </td> </tr> </tbody> </table>	Feature	Objective	Site	<ul style="list-style-type: none"> Safe, stable and non polluting Minimise the visual impact of any aboveground ancillary infrastructure agreed to be retained for an alternative use 	Solar farm surface and subsurface infrastructure	<ul style="list-style-type: none"> All infrastructure to be decommissioned and removed unless the secretary agrees otherwise All underground cabling is to be removed 	Land Use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) 	Community	<ul style="list-style-type: none"> Ensure public safety at all times 	<ul style="list-style-type: none"> N/A 	Not triggered until following operation.	Not Triggered
Feature	Objective													
Site	<ul style="list-style-type: none"> Safe, stable and non polluting Minimise the visual impact of any aboveground ancillary infrastructure agreed to be retained for an alternative use 													
Solar farm surface and subsurface infrastructure	<ul style="list-style-type: none"> All infrastructure to be decommissioned and removed unless the secretary agrees otherwise All underground cabling is to be removed 													
Land Use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 4 Land Capability) 													
Community	<ul style="list-style-type: none"> Ensure public safety at all times 													

Schedule 4 – Environmental Management and Reporting

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
1	<p>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must;</p> <ol style="list-style-type: none"> a) Provide the strategic framework for environmental management of the development; b) Identify the statutory approvals that apply to the development; c) Describe the role, responsibility, authority and accountability of all key personnel involve in the environmental management of the development; d) Describe the procedures that would be implemented to; <ul style="list-style-type: none"> • Keep the local community and relevant agencies informed about the operation and environmental performance of the development; • Receive, handle, respond to, and record complaints; • Resolve any disputes that may arise; • Respond to any non-compliance; • Respond to emergencies; and e) Include; <ul style="list-style-type: none"> • References to any plans approved under the conditions of this consent; and • A clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Planning Secretary’s approval, the Applicant must implement the Environmental Management Strategy.</p>	<ul style="list-style-type: none"> • Environmental Strategy, Walla Walla Solar Farm, NGH 17/11/2022 • DPE Letter dated 19/12/22 	<p>The Environmental Management Strategy was approved by DPE on the 19/12/22. Sufficient evidence was observed during the audit to demonstrate effective implementation of the plan.</p>	Compliant
Revision of Strategies, Plans and Programs				
2	<p>The Applicant must;</p> <ol style="list-style-type: none"> a) Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning 	N/A	Construction has only recently commenced, and the management plans are yet to be reviewed.	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	activities on site; and b) Review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the; <ul style="list-style-type: none"> • Submission of an incident report under condition 7 of Schedule 4; • Submission of an audit report under condition 13 of Schedule 4; or • Any modification to the conditions of this consent. 		The management plans are required to be reviewed (and updated as necessary) following the submission of this audit report to DPE.	
Updating and Staging of Strategies, Plans or Programs				
3	With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Notes: <ul style="list-style-type: none"> • <i>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.</i> • <i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i> 	N/A	Administrative note	Not Triggered
NOTIFICATIONS				
Notification of Department				
4	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations,	<ul style="list-style-type: none"> • DPE Letter dated 24/1/23 	DPE were notified of the commencement of construction of the development on 24	Non-compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>		January 2023. This notification was provided to DPE on the same day of construction (not prior to) the commencement of construction and has been noted as a non-compliance by the Department	
All Layout Plans				
5	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure, via the Major Projects website.	<ul style="list-style-type: none"> DPE Confirmation email dated 24/1/23 DPE Post Approval form 	The detailed plans were submitted to the Department prior to the commencement of construction	Compliant
Work as Executed Plans				
6	Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website.	<ul style="list-style-type: none"> NA 	Condition is not triggered until the commencement of operations	Not triggered
Incident Notification				
7	The Planning Secretary must be notified in writing via the Major Projects website immediately after the applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	<ul style="list-style-type: none"> Incident register 	Not triggered – there have been no incidents on site to date that would trigger this requirement.	Compliant
Non-Compliance Notification				
8	The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the conditions of consent that the development is non-compliant	<ul style="list-style-type: none"> As above 	As above	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	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.			
INDEPENDENT ENVIRONMENTAL AUDIT				
9	Independent Audits of the development must be conducted and carried out in accordance with <i>Independent Audit Post Approval Requirements (2020)</i> to the following frequency; a) Within 3 months of commencing construction; and b) Within 3 months of commencement of operations.		This is the initial audit undertaken on the 24 th of April 2023. The audit was undertaken within three months of the commencement of construction	Compliant
10	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> DPE letter of approval dated 23/2/23 	DPE Approved Mr Richard Peterson of Trigalana Environmental Pty Ltd to undertake this audit.	Compliant
11	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 9 of Schedule 4, upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	<ul style="list-style-type: none"> Audit Interview 	No requests of this nature have been made by DPE.	Not Triggered
12	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must; a) Review and respond to each Independent Audit Report prepared under condition 9 of Schedule 4 of this consent, or condition 11 of Schedule 4 where notice is given by the Planning Secretary; b) Submit the response to the Planning Secretary; 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;	<ul style="list-style-type: none"> N/A 	Not triggered, however it is noted that this requirement needs to be fulfilled following completion of this audit.	Not Triggered
13	Independent Audit Reports and the Applicant's response to audit findings may be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> N/A 	Not triggered, however it is noted that this requirement needs to be fulfilled following completion of this audit.	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
14	Notwithstanding the requirements of the <i>Independent Audit Post Approvals 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.	<ul style="list-style-type: none"> N/A 	Not triggered, condition related to the operational stage.	Not Triggered
ACCESS TO INFORMATION				
15	<p>The Applicant must;</p> <p>b) Make the following information publicly available on its website as relevant to the stage of the development;</p> <ul style="list-style-type: none"> The EIS; The final layout plans for the development; Current statutory approvals for the development; Approved strategies, plans or programs required under the conditions of this consent; The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; Provide a 24hr telephone line and instruction as to how complaints or enquiries about the development can be made; A complaints register; Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and Any other matter required by the Planning Secretary; and <p>c) Keep this information up to date.</p>	<ul style="list-style-type: none"> Project website: FRV Walla Walla Solar Farm Home 	<p>Documents and information available on the Proponents website include the following:</p> <ul style="list-style-type: none"> Traffic Management Plan Heritage Management Plan Fire Management Plan Emergency Response Plan Landscaping Plan Safety Management Study Complaints Procedure and project contact details <p>Documents that are not provided on the website include the following.</p> <ul style="list-style-type: none"> Independent audits (not required at this stage as there are no audits undertaken prior to this audit) Complaints Register Biodiversity management plan Final Layout Plans <p>Recommendation</p> <p>It is recommended that the project website is updated to include the complaints register, final layout plans and the biodiversity management plan as required by this condition. The website also needs to be updated to include this</p>	Non-Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			audit report and the Proponents response to the audit report when it is available.	

Appendix C Site Photographs



Photo 1: Waste storage containers, main site compound



Photo 2: Permanent site boundary chain wire fencing



Photo 3: Upgraded intersection with Benambra Road



Photo 4: Site office, and speed restriction signage



Photo 5: Permanent perimeter drainage



Photo 6: Permanent Landscaping/visual mitigation plantings



Photo 7: Hardstand stabilised site access, main compound



Photo 8: Rumble grid at main site compound exit point



Photo 9: Heavy Vehicle warning signage, Benambra Rd



Photo 10: Hardstand site compound and waste storage bins



Photo 11: Concrete washout pit



Photo 12: Permanent culvert drainage and scour protection



Photo 13: Sealed internal access road



Photo 14: Shaped and formed stockpile with sediment fence and located away from driplines of trees



Photo 15: Stabilised stockpile



Photo 16: Nest box



Photo 17: Protected vegetation



Photo 18: Mulch stockpile, located away from drainage lines



Photo 19: Riparian Area – No Go Zone



Photo 20: Habitat tree protection

Appendix D Stakeholder Consultation

Appendix D-1 Consultation Summary

Organisation	Key Issues/Comments	Auditor Response	Site Photos
DPE	<ul style="list-style-type: none"> Truck movements and compliance with approved routes 	<ul style="list-style-type: none"> No non-compliance with route or number of allowed trucks has been reported or recorded. The most direct route to the site is via Benambra Road which connects with the Olympic Highway and this reduces the risk of a non-compliance. 	<ul style="list-style-type: none"> NA
	<ul style="list-style-type: none"> Traffic management and road upgrades. 	<ul style="list-style-type: none"> Road upgrades have been completed. Truck numbers are tracked daily. 	<ul style="list-style-type: none"> Photo 3
	<ul style="list-style-type: none"> Compliance with and implementation of management plans. 	<ul style="list-style-type: none"> Sufficient evidence obtained throughout the audit to demonstrate that the construction environmental management plans are being implemented on site. 	<ul style="list-style-type: none"> Photos 1-20
	<ul style="list-style-type: none"> Erosion and sedimentation controls measures (implementation and maintenance); 	<ul style="list-style-type: none"> Appropriate erosion and sediment controls have been installed. A recommendation has been made for a CPESC to visit the site, review the plans and provide training to staff. 	<ul style="list-style-type: none"> Photos 7,8,13,14,15
	<ul style="list-style-type: none"> Management of water on and off site 	<ul style="list-style-type: none"> Permanent drainage infrastructure has been constructed at site boundaries. The site is generally flat with no sediment basins or internal drainage systems constructed. 	<ul style="list-style-type: none"> Photos 5,12
	<ul style="list-style-type: none"> Ensuring compliance with infrastructure offset distances; 	<ul style="list-style-type: none"> This relates to Schedule 2 Condition A5. There has been no infrastructure installed at this stage in the project, therefore this condition has not been triggered. Further assessment will be required in future audits. 	<ul style="list-style-type: none"> NA
	<ul style="list-style-type: none"> Obtaining all other relevant certificates such as CC 	<ul style="list-style-type: none"> The need to obtain crown, construction and structural certificates is for permanent buildings and structures. As the project is in early stages, this requirement has not been triggered at this stage. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Progress of landscaping requirements 	<ul style="list-style-type: none"> Implementation of the landscaping plan has commenced with permanent screening plantings commenced at site perimeter locations. 	<ul style="list-style-type: none"> Photo 6
	<ul style="list-style-type: none"> Clearing of vegetation in accordance with condition 	<ul style="list-style-type: none"> Pre-clearing inspections by an ecologist have been undertaken with a detailed report prepared of clearing activities. 	<ul style="list-style-type: none"> Photos 16,17

Organisation	Key Issues/Comments	Auditor Response	Site Photos
	<ul style="list-style-type: none"> Status of biodiversity offsets 	<ul style="list-style-type: none"> Biodiversity offset credits have now been retired. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Dust and noise management 	<ul style="list-style-type: none"> Both dust and noise are being managed effectively on site through effective erosion and sediment control, stockpile management, compliance with working hours and effective operations and maintenance of equipment. 	<ul style="list-style-type: none"> Photos 7,8,13,14,15
	<ul style="list-style-type: none"> Protection and management of aboriginal heritage items 	<ul style="list-style-type: none"> Items of aboriginal heritage have been salvaged prior to the commencement of construction. The process was overseen by NGH heritage specialists. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Waste management 	<ul style="list-style-type: none"> Minor amounts of waste have been generated by the project to date. Waste is stored in secure skip bins in the compound area. Waste disposal records are kept. 	<ul style="list-style-type: none"> Photos 1 and 10
	<ul style="list-style-type: none"> Implementation of the accommodation and employment strategy. 	<ul style="list-style-type: none"> Worker accommodation is not provided on site. A register of local employment is kept up to date. 17 suppliers have been engaged by the project to date with 16 of the suppliers local to the area (94.1%). 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Has the vegetation buffer been established as required? 	<ul style="list-style-type: none"> Vegetative replanting has commenced on site prior to construction. 	<ul style="list-style-type: none"> Photo 6
	<ul style="list-style-type: none"> What species have been planted in the buffer and are they endemic to the area? 	<ul style="list-style-type: none"> Landscape planting had been implemented at the time of the audit inspection. Gransolar advised the species planted are noted in Table 9.1 as “being derived from the General Native Vegetation Profile: Walla Walla District published in the Southwest Revegetation Guide (DLWC) 1998) and in consultation with Holbrook Landcare Network and Jayfields Nursery”. 	<ul style="list-style-type: none"> Photo 6
	<ul style="list-style-type: none"> Are weeds being managed within the buffer? 	<ul style="list-style-type: none"> Yes, weekly checks are undertaken for noxious weeds. There was no weed proliferation observed during the audit site inspection. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Has any clearing occurred outside of the development footprint? 	<ul style="list-style-type: none"> No, permanent boundary fencing has been installed with fencing of ecologically sensitive areas. There were no reported clearing incidents. 	<ul style="list-style-type: none"> Photos 6 and 17

Organisation	Key Issues/Comments	Auditor Response	Site Photos
	<ul style="list-style-type: none"> Have the required credits been retired prior to construction commencing? 	<ul style="list-style-type: none"> Yes, the biodiversity credits were retired prior to the commencement of construction. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> Are the mitigation measures outlined in Table 2-2 of the Biodiversity Management Plan dated December 2022 (Final V2) being implemented as stated? 	<ul style="list-style-type: none"> The mitigation measures described in Table 2-2 of the biodiversity management plan were reviewed by the auditor. Measures implemented in accordance with Table 2.2 include weed management, preclearing surveys undertaken by a qualified ecologist, retention of qualified ecologist following initial main clearing, clearing report, material stockpiles stored away from trees, installation of nest boxes, boundary fencing, “no go signage”, plain wire (not barbed wire) used on boundary fencing. 	<ul style="list-style-type: none"> Photos 2,6,14,15,16,17
	<ul style="list-style-type: none"> Are the Biodiversity Enhancement works outlined in Tables 6-1 and 6-4 of the Biodiversity Management Plan dated December 2022 (Final V2) being completed as proposed? 	<ul style="list-style-type: none"> The mitigation measures described in Tables 6-1 and 6-4 of the biodiversity management plan were reviewed by the auditor. Biodiversity enhancement works (particularly the planting of endemic species) in accordance with the landscaping plan, as well as retention of course woody debris and protection of riparian zones were observed to be implemented on site. 	<ul style="list-style-type: none"> Photos 6,17, 19,20
	<ul style="list-style-type: none"> Have nest boxes been installed prior to construction or clearing? 	<ul style="list-style-type: none"> Yes, nest boxes were installed. 	<ul style="list-style-type: none"> Photo 16
	<ul style="list-style-type: none"> Have existing weed infestations identified in the BDAR and pre-clearing surveys been treated as per BD12? 	<ul style="list-style-type: none"> Yes, the presence of weeds is checked during routine site inspections by Gransolar. Weed management activities undertaken by Gransolar include pre-planting herbicide application, undertaken between August and November 2022 and prior to the planting of tube stock. Further weed maintenance activities were undertaken in April/May 2023. 	<ul style="list-style-type: none"> N/A

Organisation	Key Issues/Comments	Auditor Response	Site Photos
		<ul style="list-style-type: none"> Plant Hygiene (onboarding) inspections are undertaken of all plant and equipment prior to it arriving on site to prevent the introduction of weeds to the site. No weed proliferation was observed during the site inspection. Weed management activities are deemed to be effective. 	
	<ul style="list-style-type: none"> Has baseline weed mapping been completed and photo points installed for future monitoring to be measured against? 	<ul style="list-style-type: none"> Yes, a weed survey was undertaken by the project ecologist (Narla) prior to clearing activities occurring. This is following the baseline weed surveys undertaken as part of the Biodiversity Assessment Report. 	<ul style="list-style-type: none"> N/A
	<ul style="list-style-type: none"> If the project is immediately post-construction, please ensure that the vegetation integrity plots described under 'Vegetation management' in Table 6-4 have been conducted. 	<ul style="list-style-type: none"> Not applicable, project is in the early construction phase. 	<ul style="list-style-type: none"> N/A
NSW EPA	<ul style="list-style-type: none"> EPA noted that as the project does not require an Environment Protection Licence (EPL) then the regulatory authority would be Greater Hume Council All practical measures to be implemented to protect human health and the environment from harm during the construction phase. 	<ul style="list-style-type: none"> EPAs role in the project is noted as there is no EPL. During the site inspection, reasonable and feasible measures were implemented to prevent pollution and any impacts to human health. 	<ul style="list-style-type: none"> Photos 1,2,7,8,11,12,13,14,15,18
Heritage NSW	<ul style="list-style-type: none"> All Aboriginal objects (sites) authorised for harm should be checked to ensure that Aboriginal Site Impact Reporting Forms (ASIRF) have been submitted to the Aboriginal Heritage Information Management System (AHIMS) so that the state register for Aboriginal cultural heritage remains up to date. 	<ul style="list-style-type: none"> Gransolar have appointed NGH as the Heritage Consultant. Artefacts have been salvaged prior to construction and a unique identification number has been allocated to each artefacts. The artefacts have been stored in the NGH office in Wagga Wagga. The process for analysing the material and completing the impact site cards on AHIMS commenced in January 2023. No unexpected heritage items have been discovered during the construction activities to date. 	<ul style="list-style-type: none"> N/A

Organisation	Key Issues/Comments	Auditor Response	Site Photos
	<ul style="list-style-type: none"> All Aboriginal objects that were authorised for salvage should be accounted for, including ensuring that the relevant paperwork is contained with the collection, as per Requirement 26 of the Code of Practice for Archaeological Assessment of Aboriginal Objects in NSW: https://www.heritage.nsw.gov.au/assets/Code-of-Practice-for-Archaeological-Investigation-in-NSW.pdf All Aboriginal objects, where Aboriginal cultural heritage values were not to be harmed, should be checked to confirm that no harm has occurred. 		
Local Aboriginal Land Council	<ul style="list-style-type: none"> Importance of undertaking cultural immersion training 	<ul style="list-style-type: none"> This was discussed with Gransolar and there are plans in place to undertake this training when full site mobilisation is complete and adequate employees are on site to make the training worthwhile 	<ul style="list-style-type: none"> N/A
DPE (Water)	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> N/A
Transport for NSW	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> N/A
Greater Hume Council	<ul style="list-style-type: none"> No response received 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> N/A

Appendix D-2 Correspondence Issued

From: Richard Peterson
Sent: Sunday, 12 March 2023 2:12 PM
To: Katrina O'Reilly
Cc: DPE PSVC Compliance Mailbox
Subject: SSD-9874 - Walla Walla Solar Audit - Consultation

Hi Katrina,

Further to the DPE letter of approval dated 23/02/23, I am now planning to undertake the first audit of the Walla Walla Solar Farm (SSD 9874) in accordance with the project conditions of approval.

At this stage , the exact date for the audit is yet to be confirmed, however it will be prior to the 24th of April 2023 in accordance with the Audit Program.

The audit will be undertaken in accordance with the DPE Independent Post Approval Requirements (PAR) (2020)

The purpose of this email is to:

- Formally consult with the Department in relation to any matters or focus areas the Department considers relevant to the audit
- Confirm with the Department the details of the parties to be consulted with in relation to the audit

If you could please advise in relation to the above, that would be greatly appreciated. I would appreciate a response by 26/3/23.

If any questions, please call me on the number below

Many thanks and regards



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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From: Richard Peterson
Sent: Saturday, 25 March 2023 3:17 PM
To: andrew.fisher@environment.nsw.gov.au
Cc: Simon Maffei; Michael Todd
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Hi Andrew

I am not sure if this falls in your work area, if not please point me to the correct person.

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. This link [FRV Walla Walla Solar Farm | Location](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 24th April 2023 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with BCD that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 April 2023 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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From: Richard Peterson
Sent: Saturday, 25 March 2023 3:31 PM
To: mail@greaterhume.nsw.gov.au <mail@greaterhume.nsw.gov.au>
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Hi there

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. This link [FRV Walla Walla Solar Farm | Location](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 24th April 2023 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with Council so any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 April 2023 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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From: Richard Peterson
Sent: Saturday, 25 March 2023 3:12 PM
To: DPIE Water Assessments Mailbox
Cc: Timothy Baker
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

To the DPE Water assessments team

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. This link [FRV Walla Walla Solar Farm | Location](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 24th April 2023 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with OEH Heritate that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 April 2023 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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From: Richard Peterson
Sent: Saturday, 25 March 2023 2:52 PM
To: info@epa.nsw.gov.au
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

To the EPA

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. This link [FRV Walla Walla Solar Farm | Location](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 24th April 2023 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with EPA that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 April 2023 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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From: Richard Peterson
Sent: Saturday, 25 March 2023 3:07 PM
To: Kylie-Anne.PONT@transport.nsw.gov.au
Cc: maurice.morgan@transport.nsw.gov.au
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Hi Kylie Anne

I am not sure if this fits in your work area, however this project is located near Albury.

If so, the email below is fairly self explanatory.

If not, could you please advise the best person within TfNSW to send this to?

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. This link [FRV Walla Walla Solar Farm | Location](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) and in accordance with the DPE Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit \(nsw.gov.au\)](#)

I am planning on undertaking the audit on the 24th April 2023 and as part of the audit, the NSW Department of Planning and Environment have requested I consult with OEHeritage that any issues or focus areas you have may be considered by the audit.

In this regard, I am seeking any feedback you may have and if you could please provide a response by 21 April 2023 that would be greatly appreciated.

If you have any questions, please contact me on the number below.

Many thanks and Regards.

Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775

Appendix D-3 Correspondence Received

From: Katrina O'Reilly
Sent: Monday, 13 March 2023 9:49 AM
To: Richard Peterson
Subject: RE: SSD-9874 - Walla Walla Solar Audit - Consultation

Good morning Richard,

The areas which the department would like focused on is;

Truck movements and compliance with approved routes;
Traffic management and road upgrades;
Compliance with and implementation of management plans;
Erosion and sedimentation controls measures (implementation and maintenance);
Management of water on and off site;
Ensuring compliance with infrastructure offset distances;
Obtaining all other relevant certificates such as CC;
Progress of landscaping requirements;
Clearing of vegetation in accordance with condition;
Status of biodiversity offsets;
Dust and noise management;
Protection and management of aboriginal heritage items;
Waste management and
Implementation of the accommodation and employment strategy.

Please ensure there is consultation with Council, TfNSW, BCD, Heritage NSW, Local Aboriginal Land Councils, EPA and DPE Water.

Thankyou
Regards
Katrina
Katrina O'Reilly
Team Leader Compliance

Planning & Assessment | Department of Planning and Environment
T 02 6229 7909 | **M** 0429 400261 | **E** katrina.oreilly@planning.nsw.gov.au
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620
www.dpie.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

richard.peterson-trigalana@outlook.com

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Thursday, 20 April 2023 6:13 PM
To: Mark Saddler
Subject: RE: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Thanks for the conversation Mark, appreciate your time

As discussed you raised the issue of Cultural Immersion

I will discuss this issue with the company when I am on site next week



Richard Peterson | Director
Trigalana Environmental Pty Ltd
M: 0429 227 775
E: Richard.peterson-trigalana@outlook.com

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Sent from [Mail](#) for Windows 10

From: [Mark Saddler](#)
Sent: Thursday, 20 April 2023 5:50 PM
To: [Richard Peterson](#)
Subject: RE: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Yamma Richard,

Just rang and left a message on your phone.

Please call me.

Guwayu (Safe Travels)

Mark Saddler,

From: ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>
Sent: Thursday, 13 April 2023 4:52 PM
To: Richard Peterson
Cc: Miranda Kerr
Subject: RE: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Hi Richard,

As this is the first audit response we've provided for this project we are assuming it is occurring within 12 weeks of the commencement of construction.

We note that the Conditions of Approval linked to in your email are for the original consent, not the Consolidated Consent from MOD 2. The Conditions of Approval for the MOD 2 Consolidated Consent are available here <https://www.planningportal.nsw.gov.au/major-projects/projects/mod-2-project-layout-changes>.

BCD would appreciate it if your audit reviewed the following Conditions of Consent:

Schedule 3, CoA 11 – Vegetation Buffer

- Has the vegetation buffer been established as required?
- What species have been planted in the buffer and are they endemic to the area?
- Are weeds being managed within the buffer?

Schedule 3, Condition 14 – Vegetation Clearance

- Has any clearing occurred outside of the development footprint?

Schedule 3, Condition 15 – Biodiversity Offsets

- Have the required credits been retired prior to construction commencing?

Schedule 3, Condition 16 – BMP Implementation

- Are the mitigation measures outlined in Table 2-2 of the Biodiversity Management Plan dated December 2022 (Final V2) being implemented as stated?
- Are the Biodiversity Enhancement works outlined in Tables 6-1 and 6-4 of the Biodiversity Management Plan dated December 2022 (Final V2) being completed as proposed?
- Have nest boxes been installed prior to construction or clearing?
- Have existing weed infestations identified in the BDAR and pre-clearing surveys been treated as per BD12?
- Has baseline weed mapping been completed and photo points installed for future monitoring to be measured against?
- If the project is immediately post-construction, please ensure that the vegetation integrity plots described under 'Vegetation management' in Table 6-4 have been conducted.

We would appreciate it if you could advise us of the results of the audit when it's complete.

Thanks

Simon Maffei
A/Senior Team Leader, Planning – South West

Biodiversity and Conservation | Department of Planning and Environment

From: Briohny Seaman
Sent: Thursday, 30 March 2023 3:24 PM
To: Richard PETERSON
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Good Afternoon Richard,

The EPA understand that you are carrying out an independent audit of the Walla Walla Solar Farm. The EPA has responsibilities for pollution control and environmental management for scheduled activities under the *Protection of the Environment Operations Act 1997* (POEO Act), based on information provided to the EPA during the project planning phase the development is not a scheduled activity under the POEO Act and does not require an Environment Protection Licence. Under the POEO Act Greater Hume Shire Council will be the Appropriate Regulatory Authority for pollution control and environmental management issues for the proposal.

The proponent should be aware that under section 120 of the POEO Act, it is an offence in NSW to pollute waters. During construction the proponent must take all necessary precautions and implement all practical measures that could be taken to prevent, control, abate or mitigate water pollution and protect human health and the environment from harm during the construction phase.

If you have any further questions, please don't hesitate to get in touch.

Regards

Briohny Seaman
A/Unit Head
Regulatory Operations
NSW Environment Protection Authority
D 02 6983 4918 | M 0417 203 094



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

----- Forwarded Message -----

From: Richard Peterson [richard.peterson-trigalana@outlook.com]
Sent: 25/03/2023 14:52

Project name	Walla Walla Solar Farm
Consent Number	SSD-9874
Description of Project	Construction and operation of a 300 megawatt (MW), alternating current (AC), photovoltaic (PV) solar farm, located approximately 4.3 kilometres (km) north-east of Walla Walla and 10 km southwest of Culcairn in southern NSW
Proponent	FRV Services
Date	23 June 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:


I declare that

- (i) the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- (ii) the findings of the audit are reported truthfully, accurately and completely;
- (iii) I have exercised due diligence and professional judgement in conducting the audit;
- (iv) I have acted professionally, objectively and in an unbiased manner;
- (v) 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;
- (vi) 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;
- (vii) 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
- (viii) 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:

- a) 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 corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to the false and misleading information; section 307Bv (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of auditor Richard Peterson

Signature 

Qualification BE Civil, M Environmental Management

Company: Trigalana Environmental Pty Ltd