



Independent DPHI Environmental Compliance Audit

SSD-9874 – Walla Walla Solar Farm

Trigalana Environment Pty Ltd

Audit Date: 19 August 2025



Independent DPHI Environmental 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 Environmental Audit (IEA) of the 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 Contractor for the operational day to day management of the site.

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 (DPHI) Independent Audit Post Approval Requirements (2020).

The Audit focuses on the operational phase of the development and 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 19th of August 2025 with members of Gransolar present.

The findings of the audit are:

- Construction works are complete, the solar farm is fully operational
- Permanent infrastructure including solar panels, electrical systems, internal roads, drainage, culverts, maintenance facilities, offices and site fencing has been installed
- Site rehabilitation is complete with effective groundcover provided to prevent erosion and dust
- Evidence of the implementation of the various specialist management plans such as emergency, biodiversity etc were observed both in the field with supporting documentation provided to the Auditor as requested
- A total of fourteen construction related complaints were received. No complaints have been received relating to the operational phase
- Eight incidents have been reported during the Audit period relating to small spills (< 5L) and several fires. There was no evidence of residual contamination from any of the spills
- Housekeeping was a high standard. Waste bins and spill kits were available. Small volumes of chemicals were appropriately stored. There was no evidence of pests on site
- Rehabilitation, weeding and landscaping activities appear to be effective with specialist companies appointed to oversee the implementation of maintenance activities.

Substantial compliance with the conditions of consent has been achieved, however 7 non-compliances have been recorded by the Audit as summarised in Table 1:

Table 1: Summary of non – compliances recorded by the Audit.

Condition	Details of Non-Compliance	Recommendation
S 2-2	Unauthorised construction of a levee bank on the site adjacent to Back Creek which runs through the site. A Development Control Order (DCO) was subsequently issued by DPHI.	The levee bank has now been removed, and the area has been rehabilitated. The DCO actions have been completed and confirmed by DPHI.
S3 -5	One noncompliance with the requirements of this condition was identified and recorded by DPHI. This related to 2 vehicles accessing an unapproved route (Benambra Road) on 17 April 2023.	This noncompliance related to the construction phase with no further non compliances identified for the operational phase. No further recommendations are made by the Auditor.

Condition	Details of Non-Compliance	Recommendation
S 3 -31	The fitting to the water tank is not a compliant 65mm “Storz” fitting as required by this condition and requires replacement.	<p>Replace the current fitting with a 65mm Storz compliant fitting as required by this condition.</p> <p>Place a sign on the water supply tank so the water tank is easily identified by RFS in the event of an emergency.</p>
4- 2	During the Audit period, several incidents have been reported to DPHI, including several fires. However, a formal review and update to the Management Plans have not been undertaken. A review of management plans is required following this Audit	As a minimum it is recommended the Fire Management Plan and the Emergency Management Plan are reviewed and amended as required. It is recommended this review is undertaken in consultation with RFS and is aligned with their next visit to the site to ensure any issues raised by RFS are documented in the next plan revision.
S 4-4	Operation of the Solar Farm commenced on 31st of May with notification of commencement of operation issued to DPHI on 10 June 2025. As the notification was issued to DPHI after the commencement of operation, compliance with the requirements of this condition has not been achieved.	No immediate actions are recommended as the notification has now been issued. The Auditor notes that there are further notification requirements prior to the decommissioning or upgrading of the facility.
S 4- 6	The Work as executed plans were submitted to DPHI on 11/6/25 following commencement of operation of the Solar Farm compliance with the requirements of this condition has not been achieved.	No further recommendations are made specific to this noncompliance as the work as executed plans have now been submitted.
S 4-7	<p>During the Audit period a total of eight incidents have been reported to DPHI including seven minor oil and fuel spills and one fire.</p> <p>The Auditor reviewed the incident reports and relevant correspondence with DPHI and notes the incidents were not reported immediately in accordance with this condition.</p>	Ensure any incident is reported to DPHI immediately in accordance with the requirements of this condition.

Further details of the non- compliances and recommendations are provided in Section 3.

1 Introduction

1.1 Project Description

Australian solar developer, FRV Services Australia (FRV), has developed a utility scale solar farm near Walla Walla, approximately 40 km north of Albury in NSW. The project has been completed and is now fully operational. 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.

The development footprint occupies around 493 hectares (ha) of the 605 ha Project site. The Project involves 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 Table 2 with a copy of the DPHI approval for the Auditor provided in Appendix A.

Table 2: 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	29 years of environmental management experience in the infrastructure sector. Have undertaken over 100 audits including independent DPHI audits for major infrastructure projects including: <ul style="list-style-type: none"> • EnergyConnect • Culcairn Solar Farm • Limondale Solar Farm • Crudine Ridge Windfarm • Sapphire Windfarm • Rye Park Windfarm • Albion Park Bypass • Warrell Creek to Nambucca Heads • Northern Road upgrade • Tweed Valley Hospital • Windsor Bridge

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 in Table 3 below.

Table 3: 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 19th August 2025 Operations commenced on the 31 st of May 2025 within 3 months of the commencement of operations as required by this condition.

This is the second independent audit for Walla Walla Solar Farm and covers the period from the initial Audit on the 24th of April 2023 to the date of this Audit site inspection on the 19th of August 2025.

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, Housing and Infrastructure (DPHI)
 - Heritage NSW
 - Conservation Programs, Heritage and Regulation (formerly BCD)
 - Greater Hume Shire Council
 - DPIE 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 Table 4.

Table 4: Project Stakeholder Issues and Auditor Response

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
DPHI	<p>NSW Planning would like the following organisations to be consulted:</p> <ul style="list-style-type: none"> • Greater Hume Shire Council • Transport for NSW (TfNSW) • Conservation Programs, Heritage and Regulation (formerly BCD) • DPIE Water • Fire and Rescue NSW • Rural Fire Service (RFS) • Heritage NSW Division within Department of Premier and Cabinet 	As requested, these organisations were consulted with. The Auditors response to issues raised are noted below.	N/A
	Specific conditions relating to the operations phase of the development.	Noted, this Audit has focussed on the operational phase with further information provided in Appendix A.	N/A
	Road assessments requirements such as dilapidation reports etc required after construction (condition 8).	<p>As noted in IA#1 a pre-construction dilapidation survey was undertaken with another survey taken post construction.</p> <p>The post construction survey concluded there were no significant changes observed to the pavement condition along Benambra Road or signs of pavement degradation at the Olympic Highway, compared to the 2022 survey. This is consistent with observations made by the Auditor during the site inspection.</p>	2
	Rehabilitation on site and the removal of all topsoil mounds and rehabilitation of those areas.	Rehabilitation has been completed with substantial ground cover achieved. Topsoil stockpiles have been removed and rehabilitated.	9,16,17

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
	Progress and monitoring of landscaping requirements (condition 11, 12 and 13)	<p>A landscaping professional has been appointed to monitor and report on the progress of the implementation of landscaping at the Project. Example monthly reports were provided to the Auditor as evidence covering the Audit period. The monthly reports provide details of weather conditions, herbicide and pesticide use, planting and replanting activities, weed control, tree guard replacements, water monitoring and soil moisture. Photographic records are also provided in the reports. In addition to the monthly landscaping reports, further evidence of landscaping management activities was provided in the form of a preventative work order which provides details of maintenance activities including weed spraying, brush cutting, drainage work and other activities.</p> <p>As observed during the Audit site inspection, landscape plantings have been installed with tree guards placed for protection. Evidence of weed spraying was observed in the field.</p>	4-8
	Evidence of compliance with commitments, reporting and monitoring requirements in the Landscape Management Plan, Heritage Management Plan and Biodiversity Management Plan.	<p>Landscape Management Plan</p> <p>As noted in IA #1, landscape screening was implemented at the time of the IA#1 audit inspection with further landscaping activities and tree planting undertaken during the Audit period. Evidence of implementation of the Landscaping Management Plan included:</p> <ul style="list-style-type: none"> • Use of native and locally sourced species • Pruning, weeding and other maintenance records • Tree guards installed to protect small saplings from damage <p>Refer to item above in relation to monitoring and reporting.</p>	4-15

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
		<p>Heritage Management Plan</p> <p>As noted in IA#1, salvage of artefacts occurred prior to the commencement of construction with the artefacts temporarily stored at the NGH office.</p> <p>The Salvage Report prepared by NGH following completion of salvage operations provides a summary of actions taken to implement the heritage management plan including:</p> <ul style="list-style-type: none"> • Aboriginal community involvement with salvage • Aboriginal community feedback • Salvage excavation results including deposit characteristics and artefact analysis • Details of temporary storage and return to country <p>Remaining heritage items were protected by fencing as observed during the Audit site inspection.</p> <hr/> <p>Biodiversity Management Plan</p> <p>As noted in IA #1, Narla Environmental were engaged as the project ecologist. Prior to clearing Narla undertook a pre-clearing inspection and prepared a comprehensive report that detailed 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>During the IA #1 site inspection, evidence of implementation of the biodiversity management plan observed in the field included nest boxes, no go signage and fencing to prevent protected vegetation as well as tree markings to ensure correct tree removal. There was no proliferation of weeds observed on site.</p> <p>Evidence of implementation of the BMP observed during IA#2 included:</p> <ul style="list-style-type: none"> • Installation of nest boxes • Weed and pest management 	

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
		<ul style="list-style-type: none"> Retention of felled vegetation to create habitat Planting of indigenous species Revegetation of retained dams with native vegetation and conversion into small, created wetlands for habitat Pruning, weeding and other maintenance records 	
	Compliance with EIS commitments for operational phase of the development.	Section 8.2 of the EIS details the safeguards and mitigations to be implemented throughout the project including the operational phase. The safeguards identified in the EIS for the operational phase are generally consistent with the conditions of consent. A non-compliance with condition HA8 is noted (relating to the requirement to install Storz 65mm fittings to water tanks for firefighting). This is noted as a noncompliance with condition S 3-31.	19
	Evidence of compliance, education, consultation and implementation of conditions 31 and 32 (relating to operating conditions and emergency).	<p>Evidence of consultation with the RFS in relation to the emergency plan was provided to the Auditor.</p> <p>Evidence of implementation observed on site included signage advising personnel of the emergency assembly point, tagged and tested fire extinguishers and provision of a 50,000L emergency water supply. Copies of the emergency plan and emergency contact details were provided on both the site office notice board as well as the at the site entrance. An emergency alert was provided on the site notice board sharing lessons learned from fire events that have occurred during the Audit period.</p> <p>RFS have been formally advised of the commencement of project operations and have attended the site with a further visit planned for November 2025. RFS have been provided with keys to the main gate and a package of information.</p> <p>Prior to commencing on site, all personnel and visitors are required to attend a site induction that outlines the key requirements of the emergency response plan. It was noted during the Audit interview that the Project is planning on undertaking a pre-bushfire season readiness review of the emergency plan in consultation with RFS during their next visit.</p> <p>One noncompliance and 2 recommendations have been made about the water supply tank. It is also recommended the fire and emergency plan is reviewed noting there have been several site fires during the Audit period.</p>	18-21

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
	Compliance with Voluntary Planning Agreement (VPA) requirements.	Evidence of compliance with the VPA requirements included a receipt from Greater Hume Council for two separate payments totalling \$700,000 were made in December 2022. The VPA is for a total of \$2,028,404 to be paid over 30 years. The next VPA payment is due in May 2026, one year following commercial operations.	
Conservation Programs, Heritage and Regulation (formerly BCD)	<p>Confirm that the mitigation measures outlined in Table 2-2 of the Biodiversity Management Plan are being implemented as stated. Specifically:</p> <ul style="list-style-type: none"> • LU4 – Is Pest and Weed Management being implemented? • BD17 – Have retained dams been planted with native riparian vegetation? 	<p>Evidence of pest management programs being implemented included the placement of pest baits within the site maintenance shed and within electrical components on the solar farm. Appropriate waste storage facilities were provided with no litter or food waste observed during the site inspection that would attract mice, rats or other pests.</p> <p>The spraying of weeds had been recently undertaken along boundary fences with further weeding planned for the spring and summer months.</p> <p>There was no observed evidence of weed proliferation observed during the site inspection.</p>	7, 8, 12-15
	<p>Confirm that the Biodiversity Enhancement works outlined in Tables 6-1 and 6-4 of the Biodiversity Management Plan are being completed as proposed. Specifically:</p> <ul style="list-style-type: none"> • Back Creek – Has the riparian area been fenced and planted? • Dams 1, 2, 3, 6, 8, 9 – Has planting with tubestock occurred? 	<p>As observed in the Audit site inspection, the riparian zone has been fenced and planted. Riparian vegetation has been retained and fencing installed.</p> <p>Planting of dams has been undertaken with tube stock.</p>	7, 8, 12-15
DPIE(Water)	<p>The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:</p> <ul style="list-style-type: none"> • Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. 	<p>As required by the Conditions of Consent, a Soil and Water Management plan was prepared for the construction phase of the project. Construction activities have been completed, and the site stabilised with permanent drainage, ground cover, access roads and sealed concrete access driveway. Erosion and sediment risks have been effectively eliminated for the operational phase through the implementation of these measures.</p> <p>There is no groundwater extracted for the project and no requirement in the conditions of consent for an extraction plan or a subsidence plan.</p>	16,20, 23-26

Organisation	Key Issues/Comments	Auditor Response	Site Photos-Appendix C
	<ul style="list-style-type: none"> Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. 		
	The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.	<p>Minimal water is required for the operational phase of the solar farm. Drinking water is trucked in and rainwater tanks have been established on site for toilet flushing etc.</p> <p>There is insufficient water consumed by the Project to warrant the implementation of trigger response and action plans.</p>	16,20, 23-26
	Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.	<p>There are no water storage, diversion, interception or extraction activities undertaken for the project.</p> <p>There is no requirement for a Water Access License for the Project as noted above, there are no water extraction activities being undertaken.</p>	16,20, 23-26
	Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.	There is no requirement for a Water Access Licence for the Project as noted above, there are no water extraction activities being undertaken.	16,20, 23-26
Fire and Rescue NSW	No response received	N/A	N/A
RFS	No response received	N/A	N/A
Heritage NSW	No response received	N/A	N/A
Greater Hume Council	No response received	N/A	N/A
Transport for NSW	No response received	N/A	N/A

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 August 2025 where the auditor provided an overview of the audit process and confirmed the agenda for the audit.

Attendees at the opening meeting included the following personnel:

- Edison Jiang, Asset Manager, FRV Australia
- Paul Stacey, Site Operations Manager, Gransolar

2.5 Site Inspection

A site inspection was undertaken on the morning of Tuesday 19th of August 2025. The weather was cool and dry.

At the time of the Audit site inspection, all construction activities were completed, and the solar farm was fully operational. The following project features were observed by the auditor:

- Maintenance sheds and site offices
- Visual screening/permanent landscaping
- Permanent drainage and culverts
- Permanent boundary fencing
- Intersection upgrade to Benambra Rd
- Rehabilitation of exposed surfaces
- Minor earthworks and materials management
- Construction of internal access roads.

Environmental protection measures observed during the site inspection are summarised in Table 5.

Table 5: Site Inspection (Environmental Measures) Summary

Key Environmental Issues	Mitigation Measures Employed
Biodiversity	<ul style="list-style-type: none"> • Nest boxes installed • Permanent chain wire boundary fencing • Biodiversity plantings (endemic species) • Weed management • Pest management • Retained riparian and perimeter vegetation • Retained woody debris for habitat creation on site • Landscape plantings surrounding retained dams
Soil and Water Management	<ul style="list-style-type: none"> • Permanent drainage infrastructure • Stabilised site access and hardstand • Sealed internal roads • Stockpiles removed and rehabilitated • Rainwater and reuse tank • Permanent culverts and scour protection • Rumble grid at site entry/egress
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 with heritage reporting complete • Fencing provided around retained heritage items in the field
Waste and Chemicals	<ul style="list-style-type: none"> • Bunded chemical storage container • Spill kits provided in accessible locations. • Material Safety Data Sheets (MSDS) • Waste and recycling storage bins
Landscape and Visual	<ul style="list-style-type: none"> • Landscape plantings • Landscape plantings surrounding retained dams • Low level lighting (only for office and maintenance buildings) • Natural shade (green) painting of office amenities to minimise visual impacts
Fire and Emergency	<ul style="list-style-type: none"> • Asset protection zone (road buffer around perimeter of the site) • Fire refuge area and emergency assembly point signage • Fire safety alert, emergency contact details and Emergency Plan on site notice board • Emergency plan, Fire management plan and contact details available at site entrance • 50,000L firewater tank

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 7th of October 2025 where the summary of the audit findings was provided, noting areas of good practice and recommendations for improvement. Attendees at the closing meeting included the following personnel:

- Edison Jiang, Asset Manager, FRV Australia

2.8 Compliance Descriptors

The compliance status of each condition was determined using the relevant descriptors in Table 6 and as described in the DPHI 2020 Auditing Post Approval Requirement.

Table 6 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 Compliance performance

A summary of compliance performance is provided in Table 7. Further details of non-compliances, observations and recommendations are provided in Table 8.

Table 7 Compliance summary

Schedule	Number of Conditions	Compliant	Non-compliant	Not triggered
2	12	9	1	2
3	36	32	2	2
4	15	6	4	5
Total	63	47	7	9

Table 8 Audit Findings and Recommendations

Ref	Condition	Audit Finding and Recommendation	Recommendation
S 2-2	<p>The Applicant must carry out the development.</p> <p>a) Generally in accordance with the EIS; and</p> <p>b) In accordance with the conditions of this consent.</p> <p>Note: <i>The general layout of the development is shown in Appendix 1.</i></p>	<p>Non-compliant</p> <p>During the Audit period, a breach of the Planning Consent was identified by DPHI, relating to the unauthorised construction of a levee bank on the site adjacent to Back Creek which runs through the site.</p> <p>On 7 March 2024, DPHI issued a Development Control order to FRV Services with the direction to remove the levee bank and comply with other items including removing the levee bank and stabilised with an appropriate cover crop or hydro mulch.</p> <p>DPHI confirmed they are satisfied that the Development Control Order has been completed following their site inspection undertaken on the 3/5/24.</p> <p>Further details of the Control Order are provided in Section 3.2</p>	<p>There are no further recommendations in relation to this noncompliance. The DCO actions have been completed and confirmed by DPHI.</p>
S3 -5	<p>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.</p>	<p>Non-compliant</p> <p>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.</p> <p>However, during the Audit period, one noncompliance with the requirements of this condition was identified and recorded by DPHI in relation to 2 vehicles accessing an unapproved route (Benambra Road) on 17 April 2023.</p>	<p>This noncompliance related to the construction phase with no further non compliances identified. Therefore, no further recommendations are made.</p>

Ref	Condition	Audit Finding and Recommendation	Recommendation
S 3 - 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> <ul style="list-style-type: none"> a) Be planted prior to commencing construction, or by 31 July 2022, whichever is the later; b) Be comprised of species that are endemic to the area; c) Minimise views from receivers R1a, R1b, R2 and R5a within 3 years of commencing operations; d) Be designed and maintained in accordance with RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); and e) Be properly maintained with appropriate weed management <p>Unless the Planning Secretary agrees otherwise.</p>	<p>Observation</p> <p>As noted in IA #1, landscape planting had been implemented at the time of the IA#1 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 Southwest 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> <p>Plant maintenance is contracted to a company Called GMC – Monthly visits, watering and weeding to keep the plants healthy, need to meet a height of 1.5 m by a certain time.</p> <p>Monthly landscaping reports are prepared that provide details of landscaping maintenance activities including:</p> <ul style="list-style-type: none"> • Weed control • Pesticide use • Replacement of tree guards • Monitoring and replacement of dead plants • Water monitoring and moisture 	<p>It is noted in part c of this condition that the landscape vegetation buffer is to minimise views from receivers R1a, R1b, R2 and R5a within 3 years of commencing operations. It is recommended that an annual visual assessment is undertaken to determine the growth of landscaping plants and to determine whether any additional measures or planting are required.</p>
S 3 -31	<p>The Applicant must;</p> <ul style="list-style-type: none"> a) Minimise the fire risks of the development, including managing vegetation fuel loads on site; b) Ensure that the development; <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; 	<p>Non-compliant</p> <p>During the Audit period, two fires occurred on the following dates:</p> <ul style="list-style-type: none"> • 18/11/24 • 3/1/25 <p>The fire on 3/1/25 involved the attendance of the RFS on site as noted in the incident report.</p> <p>The RFS were formally notified of the operation of the project on 18/8/25.</p>	<p>Several recommendations are made in relation to the water tank:</p> <ul style="list-style-type: none"> • Replace the current fitting with a 65mm Storz compliant fitting as required by this condition • Place a sign on the water supply tank so the water tank is for firefighting purposes and to assist the RFS identify the water source in the event of a fire.

Ref	Condition	Audit Finding and Recommendation	Recommendation
	<ul style="list-style-type: none"> 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 and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>Notify the relevant local emergency management committee and RFS following construction of the development, and prior to commencing operations.</p>	<p>As observed during the Audit site inspection:</p> <ul style="list-style-type: none"> A buffer zone >10m has been established around the perimeter of the site A 50,00 L water supply tank has been established at the site entrance the fitting to the water tank is not a compliant 65mm "Storz" fitting as required by this condition and requires replacement. 	
4- 2	<p>The Applicant must;</p> <ol style="list-style-type: none"> Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and 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 <p>Any modification to the conditions of this consent.</p>	<p>Non-Compliant</p> <p>During the Audit period, several incidents have been reported to DPHI, including several fires. However, a formal review and update to the Management Plans have not been undertaken. A review of management plans is required following this Audit</p>	<p>As a minimum it is recommended the Fire Management Plan and the Emergency Management Plan are reviewed and amended as required. It is recommended this review is undertaken in consultation with RFS and is aligned with their next visit to the site.</p>

Ref	Condition	Audit Finding and Recommendation	Recommendation
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>	<p>Non-compliant</p> <p>Operation of the Solar Farm commenced on 31st of May with notification of commencement of operation issued to DPHI on 10 June 2025. As the notification was issued to DPHI after the commencement of operation, compliance with the requirements of this condition has not been achieved.</p>	<p>No immediate actions are recommended as the notification has now been issued. The Auditor notes that there are further notification requirements prior to the decommissioning or upgrading of the facility</p>
S 4-6	<p>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.</p>	<p>Non-compliant</p> <p>The Work as executed plans were submitted to DPHI on 11/6/25</p> <p>As noted in the FRV letter to DPHI on the 10/6/25, the commencement of operations. As the plans were issued to DPHI following the commencement of operation, compliance with the requirements of this condition has not been achieved.</p>	<p>No further recommendations are made specific to this noncompliance as the work as executed plans have now been submitted.</p>
S 4-7	<p>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.</p>	<p>Non-compliant</p> <p>During the Audit period a total of eight incidents have been reported to DPHI including seven minor oil and fuel spills and one fire.</p> <p>The Auditor reviewed the incident reports and relevant correspondence with DPHI and notes the incidents were not reported immediately in accordance with this condition.</p> <p>Further details and recommendations are provided in Sections 3.1 and 3.3</p>	<p>All incidents are to be reported to DPHI immediately after the proponent becomes aware of the incident.</p> <p>The Auditor notes that some of the incidents reported (such as minor fuel/ hydraulic spills that were contained on site with effective control and cleanup may not have triggered the definition of a reportable incident in accordance with the conditions of consent.</p> <p>It is therefore recommended that:</p> <ul style="list-style-type: none"> • A review of the incident classification and reporting incident procedure is undertaken to more clearly define incidents that “cause or threaten” material harm in accordance with the conditions of consent • All incidents that meet the definition of material harm are reported to DPHI immediately.

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

A summary of Agency notices with actions taken and their status is provided in Table 9

Table 9 Summary of Agency Notices

Organisation	Date Received	Notice Type	Details
DPHI	7/3/24	Development Control Order	<p>A Development Control Order (DCO) was issued by DPHI on 7 March 2024 for the construction of a levee bank on the site adjacent to Back Creek which runs through the site. The DCO was issued following receipt of a complaint to DPHI on the 17th of October 2023 and a DPHI site inspection on 30 November 2023 where the DPHI officers observed that a levee bank had been constructed.</p> <p>The terms of the DCO Order were for:</p> <ul style="list-style-type: none"> • FRV to remove the levee bank • Provide independent evidence that the ground/area subject to the levee bank is at the level/s it was prior to the construction of the levee bank • Stabilise and rehabilitate the area in accordance with the relevant rehabilitation plans • Relocate the material removed from the levee bank to a suitable location within the project boundary and stabilise with a cover crop or hydro mulch <p>GRS formally confirmed to DPHI on 9 April 2024 that the requirements of the DCO had been fulfilled. DPHI. On 6 May 2025, DPHI confirmed that they are satisfied that the requirements of the DCO have been complied with.</p> <p>Status - Closed</p>

3.3 Summary of Environmental Incidents

The Auditor reviewed incident reports for the Audit period, and a summary of those incidents are provided in Table 10.

Table 10 Incident Summary

Incident Date	Reported to DPHI	Description
4/4/23	13/7/23	Hydraulic oil leak
18/4/23	13/7/23	Hydraulic oil leak
23/6/23	13/7/23	Diesel fuel leak
27/7/23	1/8/23	Hydraulic leak
21/8/23	29/8/23	Oil Spill
7/9/23	12/9/23	Hydraulic leak
2/11/23	10/11/23	Oil Spill
10/11/23	17/11/23	Small fire

As noted in Table 10, eight incidents have been reported to DPHI, however the time frame for reporting the incidents is not “Immediately”, as required by Condition 4-7. Therefore, a non-compliance with Condition 4-7 has been raised by this Audit with a recommendation. Refer to Table 9 for further details.

3.4 Community Complaints

The Auditor reviewed the complaints register and notes the following:

- During the Audit period a total of 14 complaints were received relating to construction activities with no operational phase complaints received.
- Complaints received related to noise, rubbish, dust, weeds, security lighting, traffic, construction of embankment on back creek, property access.
- The complaints register includes corrective actions taken with the status of the actions
- All complaints are noted as closed

Overall, the complaints management system appears to be effective.

3.5 Previous Audit Report Recommendations

The status of recommendations made by the previous Audit are provided in Table 11.

Table 11 Previous Audit Report Recommendations and status

Ref	Condition	Condition	Previous Audit Finding and Recommendation	Auditor Comment and Status
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>	<p>Non-Compliant</p> <p>For further notifications to the Department, allow additional time so the Department is fully aware and has appropriate resources allocated in the event of a complaint or if any issues arise.</p>	<p>Operation of the Solar Farm commenced on 31st of May with notification of commencement of operation issued to DPHI on 10 June 2025. As the notification was issued to DPHI after the commencement of operation, compliance with the requirements of this condition have not been achieved for this Audit period.</p> <p>The Auditor notes that there are further notification requirements prior to the decommissioning or upgrading of the facility.</p> <p>Status - Closed</p>
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 	<p>Non-Compliant</p> <p>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.</p>	<p>The website has now been updated to include the relevant information required by this condition.</p> <p>Status - Closed</p>

Ref	Condition	Condition	Previous Audit Finding and Recommendation	Auditor Comment and Status
		<p>the development can be made.</p> <ul style="list-style-type: none"> 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>		
3	S 3-9	<p>The Applicant must ensure;</p> <ol style="list-style-type: none"> The internal roads are constructed as all weather roads; There is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; The capacity of the existing roadside drainage network is not reduced; All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and <p>Development related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network.</p>	<p>Compliant</p> <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 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 <p>Approved access route to the site via Olympic Highway and Benambra Road</p>	<p>The Drivers Code of conduct has been updated to include this information as recommended by the previous audit.</p> <p>Status Closed</p>
4	S3 - 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>	<p>Compliant</p> <p>Install appropriate signage at the concrete washout pit to ensure workers are aware of the correct location for the washout of their concrete chutes</p>	<p>Concreting activities have been completed, and the concrete washout pit has been removed.</p> <p>Status Closed</p>
5	S3 - 28	<p>The Applicant must;</p> <ol style="list-style-type: none"> 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> 	<p>Compliant</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.</p>	<p>As observed during the Audit site inspection, construction is complete with adequate groundcover to prevent dust emissions.</p> <p>Status Closed</p>

Ref	Condition	Condition	Previous Audit Finding and Recommendation	Auditor Comment and Status
		<p>(Landcom, 2004) manual, or its latest version;</p> <p>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;</p> <p>c) Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>d) Ensure all works are undertaken in accordance with the Guidelines of Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version, unless DPIE Water agrees otherwise.</p>	<p>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.</p>	

3.6 Supplementary Approvals and Licences

Operation of the Solar Farm does not trigger the requirement for an Environment Protection Licence for the operational phase. There are no requirements for groundwater usage, therefore a groundwater licence is not required.

3.7 Adequacy of Environmental Management Plans

The management plans 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.

A review of the management plans is required following this Audit, particularly the Fire and Emergency Management Plans noting there have been several site fires during the Audit period.

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 generally 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)
- 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.
- Substantial compliance with the conditions of consent have been achieved with any non-compliances noted in this report.

3.9 Key Strengths

Key strengths are as follows:

- Rehabilitation, weeding and landscaping activities appear to be effective with specialist companies appointed to oversee the implementation of maintenance activities.
- The site was well organised with a high standard of housekeeping observed.

Appendix A DPHI Auditor Approval

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-9874-PA-53

Mr Edison Jiang
Asset Manager
FRV Services Australia Pty Limited
Level 10 1 York Street
Sydney New South Wales 2000
23/07/2025

Sent via the Major Projects Portal only

Subject: Walla Walla Solar – Independent Environmental Audit -audit team endorsement request

Dear Mr Jiang

Reference is made to your post approval matter, SSD-9874-PA-53, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct an Independent Environmental Audit (IEA) of the Walla Walla Solar Development, as required by Schedule 4, Condition 9 (b) of SSD-9874 as modified (the consent), submitted as required by Schedule 4, Condition 10 of the consent, to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 17 July 2025.

NSW Planning has reviewed the independent auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

In accordance with Schedule 4, Condition 10 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Mr Richard Peterson of TRIGALANA ENVIRONMENTAL PTY LTD to undertake the IEA and prepare the IEA report.

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

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

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

Please note, the Lead Auditor must attend the site inspection/s.

4 Parramatta
Locked Bag 5



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Department of Planning, Housing and Infrastructure



In accordance with Schedule 4 Condition 13 of the consent you are reminded that IEA report and your response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

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

Yours sincerely

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

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

Appendix 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"> Audit site inspection 19/8/25 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	<p>The Applicant must carry out the development;</p> <p>a) Generally in accordance with the EIS; and</p> <p>b) In accordance with the conditions of this consent.</p> <p>Note: <i>The general layout of the development is shown in Appendix 1.</i></p>	<ul style="list-style-type: none"> Audit site inspection 19/8/25 Audit Interview Documents reviewed as part of the audit and noted below Letter from FRV to DPHI titled "Compliance with the Development Control Order Issued on 07 March 2024" dated 11/4/24 Letter from Astro energy/GRS to DPHI titled "Compliance with Development Control Order under Schedule 5 of the Environmental Planning and Assessment Act, 1979" dated 9/4/24 Letter from DPHI to FRV titled "Walla Walla Solar Farm, Compliance with Development Control Order" dated 06/05/24 Development Control Order Under Item 14, Part 1 Schedule 5, Section 9.3.4 of the Environmental Planning and Assessment Act, 1979, issued to 	<p>During the Audit period, a breach of the Planning Consent was identified by DPHI, relating to the unauthorised construction of a levee bank on the site adjacent to Back Creek which runs through the site.</p> <p>On 7 March 2024, DPHI issued a Development Control Order (DCO) to FRV Services with the direction to remove the levee bank and comply with several other items including removing the levee bank and stabilised with an appropriate cover crop or hydro mulch.</p> <p>DPHI confirmed they are satisfied that the Development Control Order has been completed following their site inspection undertaken on the 3/5/24.</p> <p>Further details of the Control Order are provided in Section 3.2</p>	Non-Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
		<ul style="list-style-type: none"> FRV services dated 7/3/24 DPHI Post Approval Form reference 5103023 Letter from FRV to DPHI titled "Request for Extension to comply with the Development Control Order (DCO) till 18 April 2024" dated 25/3/24 		
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"> Audit site inspection 19/8/25 Audit Interview 19/8/25 	Noted, no inconsistencies identified.	Compliant
4	<p>The Applicant must comply with any requirement/s of the Planning Secretary arising from the Departments assessment of:</p> <ul style="list-style-type: none"> a) Any strategies, plans or correspondence that are submitted in accordance with this consent; b) Any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and c) The implementation of any actions or measures contained in these documents. 	<ul style="list-style-type: none"> Audit site inspection 19/8/25 Audit Interview 19/8/25 Documents reviewed as part of the audit and noted below 	Compliance with the DPHI control order is noted and confirmed by DPHI with further details provided in Schedule 2 Condition 1 above.	Compliant
INFRASTRUCTURE OFFSET DISTANCES				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status										
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><tr><th>Receiver</th><th>Offset Distance</th></tr><tr><td>R1 a</td><td>210m</td></tr><tr><td>R1 b</td><td>485m</td></tr><tr><td>R2</td><td>900m</td></tr><tr><td>R5 a</td><td>1800m</td></tr></table>	Receiver	Offset Distance	R1 a	210m	R1 b	485m	R2	900m	R5 a	1800m	<ul style="list-style-type: none">Audit site inspection 19/8/25Walla Walla Solar Farm Site Restrictions Drawing (reference WAL- ISE-GEDRW-0006_D2) dated APR 25Walla Walla Solar Farm, General Site Layout (DWG reference number WAL-ISE-GE-DRW-0003_C6" dated 6/11/24Audit Interview	<p>The Walla Walla Site restrictions (As Built Drawings) provide the GPS coordinates of the landholder's locations R1a, R 1b, R2, R3, R4, R5. The plan also graphically demonstrates the minimum offsets have been complied with in accordance with this condition. The location of the solar panel, stations and inverters is provided on the general layout diagram.</p>	Compliant
Receiver	Offset Distance													
R1 a	210m													
R1 b	485m													
R2	900m													
R5 a	1800m													
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE														
6	<p>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.</p>	<ul style="list-style-type: none">Audit site inspection 19/8/25Audit InterviewDPHI Portal submission referenceLetter from GRS to DPHI dated 8/10/24Walla Walla Solar Farm, General Site Layout (DWG reference number WAL-ISE-GE-DRW-0003_C6" dated 6/11/24Walla Walla SF Updated Site Layout upgrade, Ancillary Infrastructure Upgrades Rev 0 dated 8/11/24Letter from Gransolar to DPHI titled "Notification of updated layout plans and project details: dated 11/11/24.	<p>DPHI were notified on 11 November 2024 of an updated layout plan with attached documentation incorporating:</p> <ul style="list-style-type: none">Addition of a harmonic filter to the substationFormalising the operations storage area via a new warehouse as part of the O&M facilities	Compliant										

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
STRUCTURAL ADEQUACY				
7	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p>Notes:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	<ul style="list-style-type: none"> Site Inspection 19/8/25 Audit Interview Construction Certificate Number No 763.10/2022, Procert Group Pty Ltd, dated 31/5/24 Construction Certificate Number No 763.10/2022, Procert Group Pty Ltd, dated 31/5/24 Construction Certificate Number No 763.2/2022, Procert Group Pty Ltd, dated 10/1/23 Construction Certificate Number No 763.5/2022, Procert Group Pty Ltd, dated 22/5/23 Construction Certificate Number No 763.7/2022, Procert Group Pty Ltd, dated 31/7/23 Construction Certificate Number No 763.8/2022, Procert Group Pty Ltd, dated 7/11/23 Construction Certificate Number No 763.9/2022, Procert Group Pty Ltd, dated 15/2/24 Construction Certificate – Building, Certificate Number 11.2022.182.11, dated 5/8/22 Final Occupation Certificate No.13 2022.182.2, Greater Hume Council dated 23/1/25 Occupation Certificate Number No 763.12/2022, Procert Group Pty Ltd, dated 25/6/25 	<p>Procert have been engaged by FRV Services Australia Pty Ltd as the project certifier. Construction and Occupation certificates were provided to the Auditor to demonstrate compliance with the requirements of this condition.</p> <p>In addition, the certificates provided by ProCERT, construction and occupation certificates were provided by Greater Hume Shire Council for the buildings located on the site. The certificates confirm compliance with the BCA requirements.,</p>	Compliant
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</i></p>	<ul style="list-style-type: none"> Site Inspection 19/8/25 Audit Interview 	<p>There has been no demolition on the project to date with no demolition required.</p>	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Structures, or its latest versions.			
PROTECTION OF PUBLIC INFRASTRUCTURE				
9	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must;</p> <ul style="list-style-type: none"> a) Repair or pay the full costs associated with repairing, any public infrastructure that needs to be relocated as a result of the development. b) 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 19/8/25 • Audit Interview • Road Condition Assessment (After Construction) Walla Walla Solar Farm (Benambra Road, between the Olympic Highway Intersection and Cummins Road; and Schnieders Road, rytenschild traffic engineering dated 14/3/25 	<p>Following construction, a road condition assessment was undertaken by an independent traffic consultant which concluded the following:</p> <ul style="list-style-type: none"> • <i>There were no significant changes observed to the pavement condition along Benambra Road</i> • <i>It appeared there was some maintenance carried out to the unsealed section of Benambra Road, however there is some rutting and potholing due to recent weather conditions</i> • <i>There were no signs of pavement degradation at the Olympic Highway, compared to the 2022 survey</i> • <i>It is noted that the dirt observed on Benambra Road near the Olympic Highway (eastbound) is not project related</i> <p>The Auditor did not observe any damage to Benambra Road during the Audit site inspection.</p>	Not triggered
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> <ul style="list-style-type: none"> a) Maintained in a proper and efficient condition; and b) Operated in a proper and efficient manner. 	<ul style="list-style-type: none"> • Site Inspection 19/8/25 • Audit Interview • Preventative Maintenance Summary Walla Walla 01 June 2025 – 30 June 2025 	<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 a weekly pre-start check undertaken. Records kept of scheduled maintenance using the hammer tech system.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
SUBDIVISION				
11	<p>The Applicant may subdivide the site as identified in Appendix 4 and in accordance with the requirements of the EPA Act and EP&A Regulation</p> <p>Notes</p> <ul style="list-style-type: none"> Under Part 6 of the EPA&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision Division 6.4 of Part 6 of the EP&A Act sets out the application requirements for subdicion certificates 	<ul style="list-style-type: none"> Pre Application Submission Form, Certificate Case Number CFT-257741 dated 27/11/20 Letter from Greater Hume Council to FRV Services Australia Pty Ltd titled "Subdivision Certificate No. 15.2022.182.2" dated 27/11/2020 Deposited Plan – DP1292515 dated 13/6/23 	The land has been subdivided and a subdivision certificate provided by Greater Hume Council.	Compliant
COMMUNITY ENHANCEMENT				
12	<p>Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with;</p> <ol style="list-style-type: none"> Division 7.1 of Part 7 of the EP&A Act; and 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 Greater Hume Council Tax Invoice Reference 3297801000336849 dated 13/12/22 	<p>A letter of offer to Greater Hume Council was made on the 11/9/2020. The Voluntary Planning Agreement (VPA) was executed on 12th 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.</p> <p>Evidence of compliance with the VPA requirements included a receipt from Greater Hume Council for two separate payments totaling \$700,000 were made in December 2022. The VPA is for a total of \$2,028,404 to be paid over 30 years. The next VPA payment is due in May 2026, one year following commercial operations.</p>	Compliant

Schedule 3 Environmental Conditions – General

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
BATTERIES				
Battery Storage Restriction				
1	<p>Battery storage is not permitted on the project site.</p> <p>Note: <i>This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to permit battery storage in the future.</i></p>	<ul style="list-style-type: none"> Site Inspection 19/8/25 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	<p>The Applicant must ensure that the;</p> <p>a) Development does not generate more than;</p> <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 <p>b) Length of any vehicles (excluding heavy vehicles requiring escort) used for the development does not exceed 26 metres unless the Planning</p>	<ul style="list-style-type: none"> Site Inspection 19/8/25 Audit Interview O&M Equipment Inductions Register 	<p>There were no heavy vehicles or vehicles greater than 26m in length observed to be arriving or departing the site.</p> <p>As the construction activities have been completed, there is no requirement for heavy vehicles to attend the site.</p> <p>A register of all vehicles is kept on site including light vehicles.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Secretary agrees otherwise.			
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 Vehicles on site register for construction type vehicles 	As noted during IA1, a daily register of truck movements is kept on site. There were no heavy vehicles entering or leaving the site during the operational phase. A register of light vehicles is maintained on site.	Compliant
Access Route				
4	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. 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>	<ul style="list-style-type: none"> Site Inspection 19/8/25 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 19/8/25 Letter from DPHI to GRS titled Walla Walla Solar Farm – (SSD - 9874) Non-Compliance – Heavy vehicle use of unauthorised route – 17 April 2023" dated 9/5/23 	<p>All vehicles were observed to be entering and exiting the nominated points during the site inspection.</p> <p>However, during the Audit period, one noncompliance with the requirements of this condition was identified and recorded by DPHI in relation to 2 vehicles accessing an unapproved route (Benambra Road) on 17 April 2023.</p> <p>This noncompliance related to the construction phase with no further non compliances identified. Therefore, no additional recommendations are made.</p>	Non-compliant
6	The following vehicles may also use the Substation Access point on Benambra Road, as identified in Appendix 1: a) Heavy vehicles requiring escort	<ul style="list-style-type: none"> Site Inspection 19/8/25 	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

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	transporting substation components; b) Light vehicles travelling from the west associated with the construction of the substation; and c) Vehicles associated with the operation of the substation.			
Road Upgrades				
7	Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must construct: <ul style="list-style-type: none"> a) 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; b) Four vehicle crossing access points on Schneiders Road, as identified in Appendix 1; c) 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 • To the satisfaction of Council. 	<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 Entrance Drawing drawing TGS Number G23-0316 Version 001 dated 13/2/23 	As noted in IA #1, construction of the main access point and the substation access points were completed in 2022 prior to the commencement of construction.	Compliant
Road Maintenance				
8	The Applicant must; <ul style="list-style-type: none"> a) Undertake an independent dilapidation survey to assess the; <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 	<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 • DPHI Letter dated 22/12/22 • Road Condition Assessment (After Construction) Walla Walla Solar Farm (Benambara Road, between the Olympic Highway Intersection and Cummins Road; and Schnieders Road, .rytensild traffic 	The dilapidation report was undertaken in September 2022, prior to the commencement of construction activities on the 24/1/23. The survey included: <ul style="list-style-type: none"> • Existing conditions 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. 	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> 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"> engineering dated 14/3/25 DPHI Post Approval form – Walla Walla Solar – SSD-9874-PA-49 Email from Greater Hume Council to Gransolar titled “WAL – Council Review of Dilapidation Survey” dated 29/1/25 Letter from FRV to DPHI titled “Submission of Independent Dilapidation Survey Post Construction” dated 	<p>DPHI 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>Following construction, a road condition assessment was undertaken by an independent traffic consultant which concluded the following:</p> <ul style="list-style-type: none"> <i>There were no significant changes observed to the pavement condition along Benambra Road</i> <i>It appeared there was some maintenance carried out to the unsealed section of Benambra Road, however there is some rutting and potholing due to recent weather conditions</i> <i>There were no signs of pavement degradation at the Olympic Highway, compared to the 2022 survey</i> <i>It is noted that the dirt observed on Benambra Road near the Olympic Highway (eastbound) is not project related</i> <p>A copy of the report was provided to Council with a response received from Council on 29/1/25 noting that “Considering the report from my Roads inspector and our discussion it would appear that the solar farm operations was not responsible for the conditions of Schnieders Road at the time of our Councils Inspection, this being the case, Council thereby agrees and signs off the Dilapidation Survey that was supplied”</p> <p>A copy of the post construction dilapidation survey with correspondence from Council was provided to DPHI on 10/2/25.</p>	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			<p>The Auditors' observations during the site inspection are consistent with the findings of the inspection</p> <p>At the time of the Audit there were no plans to upgrade the solar farm.</p>	
Operating Conditions				
9	<p>The Applicant must ensure;</p> <ul style="list-style-type: none"> a) The internal roads are constructed as all weather roads; b) There is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site; c) The capacity of the existing roadside drainage network is not reduced; d) All vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and e) Development related vehicles leaving the site are in clean condition to minimise dirt being tracked onto the sealed public road network. 	<ul style="list-style-type: none"> • Site Inspection 19/8/25 • Incident Register • Weekly environmental checklist 24/3/23 • Drivers Code of Conduct – Revision A dated 4/4/23 	<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 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> <ul style="list-style-type: none"> • As recommended by IA #1, the Driver Code of Conduct has been updated to include a requirement that no parking occurs on the public road network or in the vicinity of the site • A requirement that 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 	Compliant
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</p>	<ul style="list-style-type: none"> • DPHI Letter dated 23/11/22 	<p>DPHI 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 	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>to the satisfaction of the Planning Secretary in writing. This plan must include;</p> <ul style="list-style-type: none"> a) Details of the transport route to be used for all development related traffic; b) Details of the road upgrade works required by Condition 7 of Schedule 3 of this consent; c) Details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including; <ul style="list-style-type: none"> • 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 		<ul style="list-style-type: none"> • Council and Hurricane Hill Hardrock Quarry. contains the information required by the conditions of approval. 	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>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;</p> <ul style="list-style-type: none"> • 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 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				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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> <ul style="list-style-type: none"> a) Be planted prior to commencing construction, or by 31 July 2022, whichever is the later; b) Be comprised of species that are endemic to the area; c) Minimise views from receivers R1a, R1b, R2 and R5a within 3 years of commencing operations; d) Be designed and maintained in accordance with RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); and e) Be properly maintained with appropriate weed management <p>Unless the Planning Security agreements agree otherwise.</p>	<ul style="list-style-type: none"> • Site Inspection 19/8/25 • Photo 6 • Walla Walla Solar Farm Landscaping Plan • Walla Walla Solar Farm – Landscaping Monthly Report, dated 28/2/23 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/7/23 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 28/2/23 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/8/23 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/12/23 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/01/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 29/2/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 30/4/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/5/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 30/6/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 31/7/24 • Walla Walla Solar Farm – Landscaping Monthly Report, dated 30/9/24 	<p>As noted in IA #1, landscape planting had been implemented at the time of the IA#1 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 Southwest 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> <p>Plant maintenance is contracted to a specialist maintenance company who undertake monthly visits, watering and weeding to keep the plants healthy.</p> <p>Monthly landscaping reports are prepared that provide details of landscaping maintenance activities including:</p> <ul style="list-style-type: none"> • Weed control • Pesticide use • Replacement of tree guards • Monitoring and replacement of dead plants • Water monitoring and moisture <p>Recommendation</p> <p>It is noted in part c of this condition that the landscape vegetation buffer is to minimise views from receivers R1a, R1b, R2 and R5a within 3 years of commencing operations. It is recommended that an annual visual assessment is undertaken to determine the growth of landscaping plants and to determine whether any additional measures or planting are required.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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> <ul style="list-style-type: none"> a) A description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 11 (a)-€; above; b) A program to monitor and report the effectiveness of these measures; and c) Details of who would be responsible for monitoring, reviewing and implementing the plan; and timeframes for the completion of actions. <p>Following the Planning Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<ul style="list-style-type: none"> • Landscaping Plan, Walla Walla Solar Farm SSD -9874, April 2022 • DPHI Letter dated 5/5/22 • Site Inspection 19/8/25 	<p>NGH have prepared the landscaping plan for the project which includes: Details of consultation with Receivers R1, R2 and R5a.</p> <p>DPHI 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> <p>At the time of IA#2, one round of post construction weeding has been to date focusing on the fence line and power station with the next round of weeding planned for the spring months.</p>	Compliant
LAND MANAGEMENT				
13	<p>The Applicant must maintain the agricultural land capacity of the site, including;</p> <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; <p>Unless the Planning Secretary agrees otherwise.</p>	<ul style="list-style-type: none"> • Preventative Work Order – Vegetation Control, GRS 	<p>At the time of the Audit site inspection, ground cover was established and appeared to be well maintained with no proliferation of weeds observed. Maintenance records were provided to demonstrate ongoing weed management.</p> <p>The site was not being actively used for Agriculture however it was noted that the plan is to introduce grazing in consultation with the landowners.</p>	Compliant
BIODIVERSITY				
Vegetation Clearance				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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 19/8/25 Incident Register EIS Project Boundary Maps 	<p>As noted in IA #1, there was no observed clearing outside the project boundary footprint. Controls to prevent unauthorised clearing included boundary fencing, "No Go" Signage and fencing.</p> <p>There have been no subsequent reports of over-clearing during the Audit period.</p>	Compliant
Biodiversity Offsets				
15	<p>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.</p> <p>The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offset Scheme</i> and can be achieved by:</p> <ol style="list-style-type: none"> Acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; Making payments into an offset fund that has been developed by the NSW Government; or Funding a biodiversity conservation action that benefits the entirety impacted and is listed in the ancillary rules of the biodiversity offset scheme. 	<ul style="list-style-type: none"> Letter from Biodiversity Conservation trust dated 12/12/22 	<p>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".</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status																									
	<div><p>Table 1: Ecosystem Credit Requirements</p><table><tr><th>Vegetation Community</th><th>PCT ID</th><th>Credits Required</th></tr><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></table><p>Table 2: Species Credit Requirements</p><table><tr><th>Species Credit Species</th><th>Credits Required</th></tr><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></table></div>			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	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; a) Include a description of the measures and timeframes that would be implemented for;	<ul style="list-style-type: none">Biodiversity Management Plan, Walla Walla Solar Farm dated 22/12/22DPHI Letter dated 12/1/23Preclearing Survey Report for Gransolar – February 2023Site Inspection 19/8/25	As noted in IA #1, 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 findings relating to the following ecological aspects: <ul style="list-style-type: none">Habitat treesThreatened flora	Compliant																									

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<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 operation of the development; 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</p>		<ul style="list-style-type: none"> Threatened fauna Nocturnal surveys Priority weeds <p>During the IA #1 site inspection, evidence of implementation of the biodiversity plan observed in the field included nest boxes, no go signage and fencing to prevent protected vegetation as well as tree markings to ensure correct tree removal. There was no proliferation of weeds observed on site.</p> <p>Evidence of implementation of the BMP observed during IA#2 included:</p> <ul style="list-style-type: none"> Installation of nest boxes Weed and pest management Retention of felled vegetation to create habitat Planting of indigenous species <p>Revegetation of retained dams with native vegetation and conversion into small, created wetlands for habitat</p>	

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>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>			
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> <ul 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 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. 	<ul style="list-style-type: none"> • Site Inspection 19/8/25 • Audit Interview • Incident register 	<p>All work has 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
Noise				
18	<p>The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or it's latest version.</p>	<ul style="list-style-type: none"> • Site Inspection 19/8/25 • Incident register 	<p>As noted in IA #1, 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 IA #1 site inspection.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			Condition not applicable to the operational phase	
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 	As noted in IA #1, the Gransolar Project Manager was appointed as the neighbor liaison officer for the construction phase. The neighborhood liaison officer is a construction related role and is not required during the operational phase.	Compliant
Dust				
20	The Applicant must minimise the dust generated by the development.	<ul style="list-style-type: none"> Site Inspection 19/8/25 	At the time of the Audit site inspection, all internal roads were completed and were stabilised. Exposed surfaces were revegetated with substantial groundcover achieved to prevent dust. Roads are gravel based with speed restrictions signage installed to prevent the generation of dust from vehicles.	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 19/8/25 	IA #1 noted that a water cart is available for use at this location. No dust issues were identified during the audit site inspection.	Compliant
Visual				
22	The Applicant must; <ol style="list-style-type: none"> Minimise the off site visual impacts of the development, including the potential for any glare or reflection; Ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and Not mount any advertising signs or logos on site, except where this is required for identification or safety 	<ul style="list-style-type: none"> Site Inspection 19/8/25 	All ancillary infrastructure was painted non reflective green and were located away from visually sensitive receivers with vegetation retained and additional tree plantings provided to mitigate any impacts. There were no advertising or logos observed on site.	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	purposes.			
Lighting				
23	<p>The Applicant must;</p> <ul 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 19/8/25 • Audit interview 	<p>There was no lighting installed that would result in obtrusive impacts to nearby residential receivers. The only lighting installed on site is low level outdoor office lighting.</p>	Compliant
HERITAGE				
Protection of Heritage Items				
24	<p>The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint.</p> <p>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 Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.</p>	<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 • Salvage Report, Walla Walla Solar Farm, NGH, March 2024 • Aboriginal Cultural Heritage Assessment, Walla Walla Solar Farm, NGH Environmental, September 2019 • Audit Interview 	<p>As noted in IA#1, salvage of artefacts occurred prior to the commencement of construction with the artefacts temporarily stored at the NGH office.</p> <p>The Salvage report prepared by NGH following completion of salvage operations provides a summary of actions taken to implement the heritage management plan including</p> <ul style="list-style-type: none"> • Aboriginal community involvement with salvage • Aboriginal community feedback • Salvage excavation results including deposit characteristics and artefact analysis • Details of temporary storage and return to country 	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Note: The location of the Aboriginal heritage items referred to this condition are shown in the figure in Appendix 6.		During the audit site inspection, remaining heritage items were protected by fencing.	
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"> Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary in writing; Be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; 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 	<ul style="list-style-type: none"> Heritage Management Plan, Walla Walla Solar Farm, October 2022, NGH 06/10/22 DPHI Letter dated 18/11/22 Salvage Report, Walla Walla Solar Farm, NGH, March 2024 Aboriginal Cultural Heritage Assessment, Walla Walla Solar Farm, NGH Environmental, September 2019 	<p>DPHI 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>The Salvage report, prepared by NGH following completion of salvage operations provides a summary of actions taken to implement the heritage management plan including</p> <ul style="list-style-type: none"> Aboriginal community involvement with salvage Aboriginal community feedback Salvage excavation results including deposit characteristics and artefact analysis Details of temporary storage and return to country <p>During the audit site inspection, remaining heritage items were protected by fencing.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>hearth in PAD1;</p> <ul style="list-style-type: none"> 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 development on site, and that records are kept of these inductions; and 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. 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"> Site Inspection 19/8/25 Audit interview 	<p>Minimal water is required for the operational phase of the solar farm. Drinking water is trucked in and rainwater tanks have been established on site for toilet flushing etc.,</p> <p>There are no ongoing requirements for groundwater extraction.</p> <p>Sufficient water is available for the operation of the Project.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Water Pollution				
27	The Application must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	<ul style="list-style-type: none"> Site Inspection 19/8/25 	<p>As observed during the Audit site inspection, all construction work was completed including internal roads and permanent drainage. Rehabilitation is complete with adequate groundcover to prevent uncontrolled (sediment laden water) runoff during a rainfall event.</p> <p>Minor quantities of fuels and chemicals were stored in secure and bunded areas on impermeable hardstand areas.</p> <p>Measures observed to be implemented are suitable to prevent the pollution of water.</p>	Compliant
Operating Conditions				
28	<p>The Applicant must;</p> <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 	<ul style="list-style-type: none"> Site Inspection 19/8/25 Soil and Water Management Plan, Walla Walla Solar Farm, NGH April 2023 Weekly environmental checklist 24/3/23 	<p>As noted in IA #1, Gransolar prepared and implemented a Soil and Water Management Plan to ensure erosion is minimised and water pollution is prevented for the construction phase. At the time of IA#2, all construction activities were complete with stockpiles removed. Groundcover has been established preventing the exposure of soils. Permanent drainage has been installed with gravel hardstand internal access roads to prevent erosion.</p> <p>There was no observed scouring or offsite mud tracking observed.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	d) 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.			
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 DPHI Letter dated 23/5/22 	<p>DPHI 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.</p> <p>There were no activities observed during the site inspection such as excavation, drilling or vibratory works that would present a risk to the pipeline</p>	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> <ul style="list-style-type: none"> a) The requirements of all relevant Australian Standards; and b) 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 19/8/25 	<p>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.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
Operating Conditions				
31	<p>The Applicant must;</p> <p>a) Minimise the fire risks of the development, including managing vegetation fuel loads on site;</p> <p>b) Ensure that the development;</p> <ul style="list-style-type: none"> Includes at least 10 metre defendable 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>	<ul style="list-style-type: none"> Site Inspection 19/8/25 Email from Gransolar to RFS titled "Walla Walla Solar Farm, notice of operations" dated 18/8/25 GRS Walla Walla Solar Farm, Incident Details, Electrical Incident, Event INC-11911 dated 17/1/25 GRS Walla Walla Solar Farm, Incident Details, Electrical Incident, Event INC-12736 dated 17/1/25 Letter from Safework NSW to Gransolar Constructions Australia Pty Ltd titled "Notified Workplace Incident" dated 6/1/25 Walla Walla Solar Farm, Incident Details Fire INC-13068" dated 13/1/25 	<p>During the Audit period, two fires occurred on the following dates:</p> <ul style="list-style-type: none"> 18/11/24 3/1/25 <p>The fire on 3/1/25 involved the attendance of the RFS on site as noted in the incident report.</p> <p>The RFS were formally notified of the operation of the project on 18/8/25.</p> <p>As observed during the Audit site inspection:</p> <ul style="list-style-type: none"> A buffer zone >10m has been established around the perimeter of the site A 50,00 L water supply tank has been established at the site entrance the fitting to the water tank is not a compliant 65mm "Storz" fitting as required by this condition and requires replacement. <p>Recommendation</p> <p>Several recommendations are made in relation to the water tank:</p> <ul style="list-style-type: none"> Replace the current fitting with a 65mm Storz compliant fitting as required by this consent Place a sign on the water supply tank so it is clear that the water tank is for firefighting purposes and to assist the RFS in identifying the tank 	Non-Compliant
Emergency Plan				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
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"> Be consistent with the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent); Identifying the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; List works that should not be carried out during a total fire ban; Include availability of fire suppression equipment, access and water Include availability for the storage and maintenance of any flammable materials; 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; Include a figure showing site infrastructure, Asset Protection Zone and the on site water supply tank; 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; 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; 	<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 Service Letter dated 12/11/19 NSW Fire and Rescue Email dated 19/9/22 NSW Rural Fire Service Email dated 27/9/22 Work Health and Safety Management Plan, Walla Walla Solar Farm dated 05/07/25 	<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 regard to Fire and Rescue viewpoint. Evidence of consultation with the RFS in relation to the emergency plan was provided to the Auditor.</p> <p>Evidence of implementation observed on site included signage advising personnel of the emergency assembly point, tagged and tested fire extinguishers and provision of a 50,000L emergency water supply. Copies of the emergency plan and emergency contact details were provided on both the site office notice board as well as the at the site entrance. An emergency alert was provided on the site notice board sharing lessons learned from fire events that have occurred during the audit period. RFS have been formally advised of the commencement of project operations and have attended the site.</p> <p>Prior to commencing on site, all personnel and visitors are required to attend a site induction that outlines the key requirements of the emergency response plan. It was noted during the Audit interview that the Project is planning on undertaking a pre-bushfire season readiness review of the emergency plan.</p> <p>One noncompliance in relation to the water tank and 2 recommendations have been made about water supply tank.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	j) Include bushfire emergency management planning; k) Include details of the how RFS would be notified, and procedures that would be implemented, in the event that; <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 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.			
WASTE				
33	The Applicant must; <ol style="list-style-type: none"> Minimise the waste generated by the development; Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); Store and handle all waste on site in accordance with its classification; Not receive or dispose of any waste on site; and 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. 	<ul style="list-style-type: none"> Site Inspection 19/8/25 Waste Management Plan, Walla Walla Solar Farm, Rev 00 dated 28/11/24 	A waste management plan has been prepared which notes the types of waste produced during the operational phase to include: <ul style="list-style-type: none"> PV panels, failures or damages Electrical, electronic E- Waste Maintenance activities waste General waste Scrap and other metals At the early stages of operation, minimal waste has been produced with appropriate waste facilities provided on site.	Compliant
ACCOMMODATION AND EMPLOYMENT STRATEGY				

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
34	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must;</p> <ol style="list-style-type: none"> Propose measures to ensure there is sufficient accommodation for the workforce associated with the development; Consider the cumulative impacts associated with other State significant development projects in the area; Investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and Include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. <p>Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<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 DPHI letter dated 23/12/22 Supplier Spreadsheet 	<p>As noted in IA#1 DPHI approved the Accommodation and Employment Strategy on the 23/12/2022 noting the Accommodation and Employment Strategy</p> <ul style="list-style-type: none"> Has been prepared in consultation with Greater Hume Council. Contains the information required by the consent. <p>Worker accommodation is not provided on site. Workers live in nearby towns and drive to work each day.</p>	Compliant
DECOMMISSIONING AND REHABILITATION				
35	<p>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;</p> <ol style="list-style-type: none"> Include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3; Describe the measures that would be implemented to; <ul style="list-style-type: none"> Decommission the development and rehabilitate 	<ul style="list-style-type: none"> N/A 	<p>Not triggered until three years following the commencement of operation (2028)</p>	Not Triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status						
	<div>the site in accordance with the objectives in Table 3;</div> <div><ul style="list-style-type: none">Minimise and manage the waste generated by the decommissioning of the development; andInclude a program to monitor and report on the implementation of these measures against the detailed completion criteria.</div> <div>The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning and Rehabilitation Plan.</div>									
36	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.	<ul style="list-style-type: none">N/A	Not triggered until following the cessation of operations	Not Triggered						
	<div>Table 3: Rehabilitation Objectives</div> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Site</td><td><ul style="list-style-type: none">Safe, stable and non pollutingMinimise the visual impact of any aboveground ancillary infrastructure agreed to be retained for an alternative use</td></tr><tr><td>Solar farm surface and subsurface infrastructure</td><td><ul style="list-style-type: none">All infrastructure to be decommissioned and removed unless the secretary agrees otherwiseAll underground cabling is to be removed</td></tr><tr><td>Land Use</td><td><ul style="list-style-type: none">Restore land capability to pre- existing use (at least Class 4 Land Capability)</td></tr><tr><td>Community</td><td><ul style="list-style-type: none">Ensure public safety at all times</td></tr></table>	Feature			Objective	Site	<ul style="list-style-type: none">Safe, stable and non pollutingMinimise 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 otherwiseAll underground cabling is to be removed	Land Use
Feature	Objective									
Site	<ul style="list-style-type: none">Safe, stable and non pollutingMinimise 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 otherwiseAll 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> <ul style="list-style-type: none"> a) Provide the strategic framework for environmental management of the development; b) Identify the statutory approvals that apply to the development; c) Describe the role, responsibility, authority and accountability of all key personnel 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</p>	<ul style="list-style-type: none"> • Environmental Strategy, Walla Walla Solar Farm, NGH 17/11/2022 • DPHI Letter dated 19/12/22 	<p>The Environmental Management Strategy was approved by DPHI on the 19/12/22. Sufficient evidence was observed during the audit to demonstrate effective implementation of the plan.</p>	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Applicant must implement the Environmental Management Strategy.			
Revision of Strategies, Plans and Programs				
2	<p>The Applicant must;</p> <ol style="list-style-type: none"> Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and 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. 	<ul style="list-style-type: none"> N/A 	<p>During the Audit period, several incidents have been reported to DPHI, including several fires. However, a formal review and update to the Management Plans have not been undertaken. A review of management plans is required following this Audit and as a minimum it is recommended the Fire Management Plan, and the Emergency Management Plan are reviewed and amended as required. It is recommended this review is undertaken in consultation with RFS and is aligned with their next visit to the site</p>	Non-Compliant
Updating and Staging of Strategies, Plans or Programs				
3	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the 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.</p>	<ul style="list-style-type: none"> Letter from DPHI to FRV Services Australia Pty Ltd titled "Walla Walla Solar Farm – Updated Traffic Management Plan" dated 8/8/24 Letter from FRV to DPHI titled "Submission of the updated Traffic Management Plan Rev1 for review and Approval" dated 8/5/23 Traffic Management Plan, Walla Walla Solar Farm Project, Rev 1 dated 26/4/23 	<p>During the Audit period, the Traffic Management Plan was updated and to include a new Appendix 10 – traffic guidance schemes and was issued to DPHI for approval on 8/5/23,</p> <p>DPHI subsequently approved the plan on the 8/2/24</p>	Complaint

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Notes: <ul style="list-style-type: none"> While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 			
NOTIFICATIONS				
Notification of Department				
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>	<ul style="list-style-type: none"> DPHI Letter dated 24/1/23 Letter from DPHI to FRV Services Australia Pty Ltd titled "Walla Walla Solar – Notification – Commencement of Operations 31 May 2025" dated 14/6/25 DPHI Post Approval form reference 0065742 Letter from FRV to DPHI titled "Notification of the Commencement of Operations" dated 10/6/25 Letter from FRV to DPHI titled "Notification of the Commencement of Operations" dated 17/6/25 	<p>Operation of the Solar Farm commenced on 31st of May with notification of commencement of operation issued to DPHI on 10 June 2025. As the notification was issued to DPHI after the commencement of operation, compliance with the requirements of this condition has not been achieved.</p> <p>FRV noted that the Independent Certifier for the Project reviews the completion claim of the construction phase and after they are satisfied that all conditions are achieved, they issue the completion certificate to the Contractor. This process of review and assessment by the Independent Certifier typically requires up to 10 Business Days after the claim is submitted and due to this, it was not possible for the Applicant to notify the Department earlier.</p> <p>Recommendation</p> <p>No immediate actions are recommended as the notification has now been issued. The Auditor notes</p>	Non-compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
			that there are further notification requirements prior to the decommissioning or upgrading of the facility	
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 sitting of solar panels and ancillary infrastructure, via the Major Projects website.	<ul style="list-style-type: none"> DPHI Confirmation email dated 24/1/23 DPHI 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"> Walla Walla Solar Farm – General Layout (WAL-ISE-GE-DRW-0003_D5) DPHI Post Approval form reference 1023038 Letter from FRV to DPHI titled “Notification of the Commencement of Operations” dated 10/6/25 	<p>The Work as executed plans were submitted to DPHI on 11/6/25</p> <p>As noted in the FRV letter to DPHI on the 10/6/25, the commencement of operations. As the plans were issued to DPHI following the commencement of operation, compliance with the requirements of this condition has not been achieved.</p> <p>Recommendation</p> <p>No further recommendations are made specific to this noncompliance as the work as executed plans have now been submitted.</p>	Non-compliant
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	<ul style="list-style-type: none"> Incident Report INC 346 dated 6/4/23 Incident Report INC 379 dated 18/4/23 Incident Report INC 512 dated 3/6/23 Letter from DPHI to FRV Services Australia Pty Ltd titled “Walla Walla Solar Farm – SSD 9874 Incident Notifications” dated 1/8/23 	<p>During the Audit period a total of eight incidents have been reported to DPHI including seven minor oil and fuel spills and one fire.</p> <p>The Auditor reviewed the incident reports and relevant correspondence with DPHI and notes the incidents were not reported immediately in accordance with this condition.</p> <p>Further details and recommendations are provided in</p>	Non-Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	requirements set out in Appendix 7.	<ul style="list-style-type: none"> Incident Report INC 744 dated 27/7/23 DPHI Post Approval form reference 1010128 Letter from DPHI to FRV Services Australia Pty Ltd titled "Walla Walla Solar Farm – SSD 9874 Incident Notification – 27 July 2023" dated 15/8/23 Letter from FRV to DPHI titled "Notification of Environmental Incident Reported at Walla Walla Solar Farm" dated 1/8/25 	Sections 3.1 and 3.3	
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 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.	<ul style="list-style-type: none"> Letter from FRV to DPHI titled "Notification of probable noncompliance" dated 24/4/25 DPHI Post Approval form reference 4061335 Letter from DPHI titled "Non-Compliance – Heavy Vehicle use of unauthorised route – 17 April 2023" dated 9/5/23 	DPHI were notified of a probable noncompliance on 24 April 2024 for a traffic related incident on 17 April 2023 within 7 days of the noncompliance occurring. The notification included the application number, the reasons for the noncompliance as well as actions taken to prevent recurrence. The noncompliance report was issued to DPHI via the major websites portal and notes the relevant condition to be schedule 3, condition 5.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT				
9	Independent Audits of the development must be conducted and carried out in accordance with <i>Independent Audit Post Approval Requirements</i> (2020) to the following frequency; <ol style="list-style-type: none"> Within 3 months of commencing construction; and Within 3 months of commencement of operations. 	<ul style="list-style-type: none"> Independent DPE Compliance Audit, SSD-9874 Walla Walla Solar Farm, Trigalana Environmental, 23/6/23 	<p>The initial Audit was undertaken 24th of April 2023 within three months of the commencement of construction.</p> <p>The second (operational) audit (this Audit) was undertaken on 19th of August 2025 and within three months of the commencement of operations on the 31st of May 2025.</p>	Compliant
10	Proposed independent auditors must be agreed	<ul style="list-style-type: none"> Letter from DPHI to FRV Services 	DPHI Approved Mr Richard Peterson of Trigalana	Compliant

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Australia Pty Ltd titled "Walla Walla Solar – Independent Environmental Audit – audit team endorsement request" dated 23/07/25	Environmental Pty Ltd as the Auditor on the 23/7/25 and prior to the commencement of this Audit.	
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 DPHI.	Not Triggered
12	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must; <ul style="list-style-type: none"> 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"> Letter from FRV to DPHI titled "Submission of the Independent Environmental Audit Report of the Development by Trigalana Environmental Pty Ltd" dated 26/3/23 	The initial Independent Audit report and response to the Audit findings was provided to the Planning Secretary on 26/6/23 within two months of undertaking the independent audit site inspection.	Compliant
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	<ul style="list-style-type: none"> N/A 	This is the first operational phase audit. A request has not been made to the Planning Secretary to cease operational audits.	Not triggered

Ref	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	satisfaction that independent operational audits have demonstrated operational compliance.			
ACCESS TO INFORMATION				
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>b) 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 • Independent audits and response to the Audit findings • Complaints Register • Biodiversity management plan • Final Layout Plans <p>As recommended by the previous (construction phase audit), the website has been updated to include independent audits, the complaints register, the biodiversity management plan and the final layout plans.</p>	Compliant

Appendix C Site Photographs



Photo 1: General project photo



Photo 2: Upgraded intersection with Benambra Road



Photo 3: Retained vegetation and perimeter road



Photo 4: Landscape plantings and solar panels



Photo 5: Landscape plantings



Photo 6: Landscape plantings and perimeter fencing



Photo 7: Landscape plantings – farm dam



Photo 8: Landscape plantings – farm dam



Photo 9: Rehabilitated stockpile area



Photo 10: Nestbox installation



Photo 11: Heritage exclusion zone and protective fencing



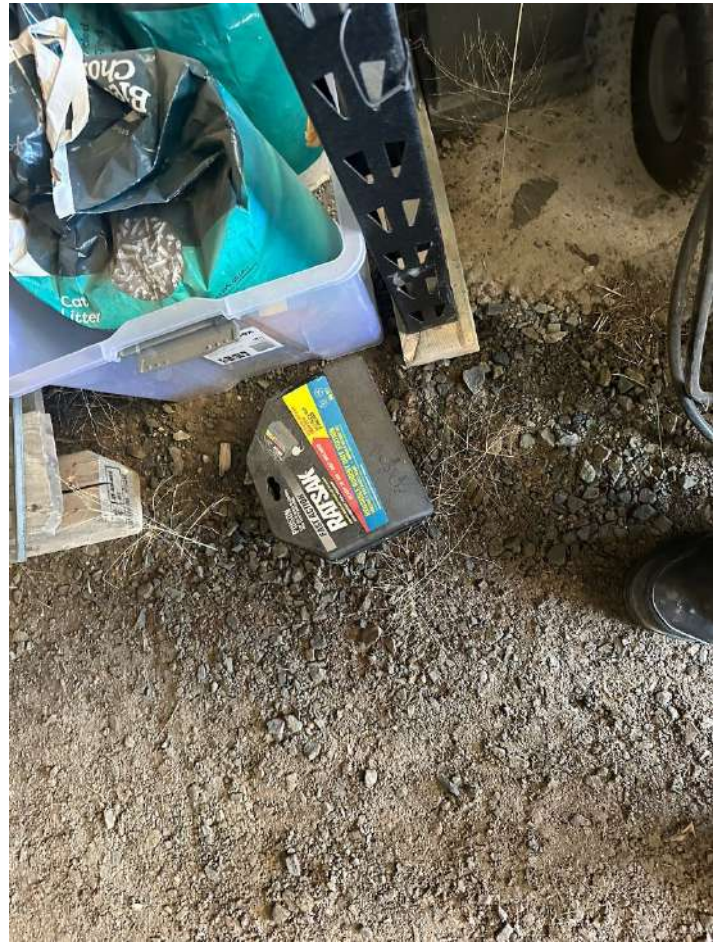
Photo 12: Treated weeds



Photo 13: Treated weeds adjacent to the boundary fence



Photo 14: Treated weeds adjacent to the boundary fence



Photos 15a and 15 b: Pest abatement measures



Photo 16: Ground cover/regrowth between the solar panels



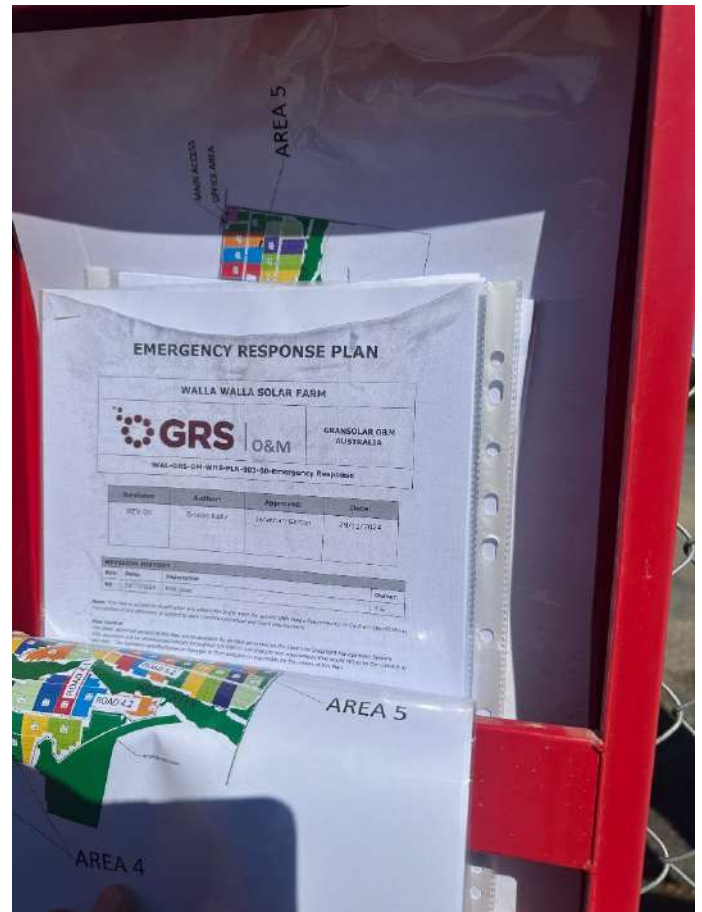
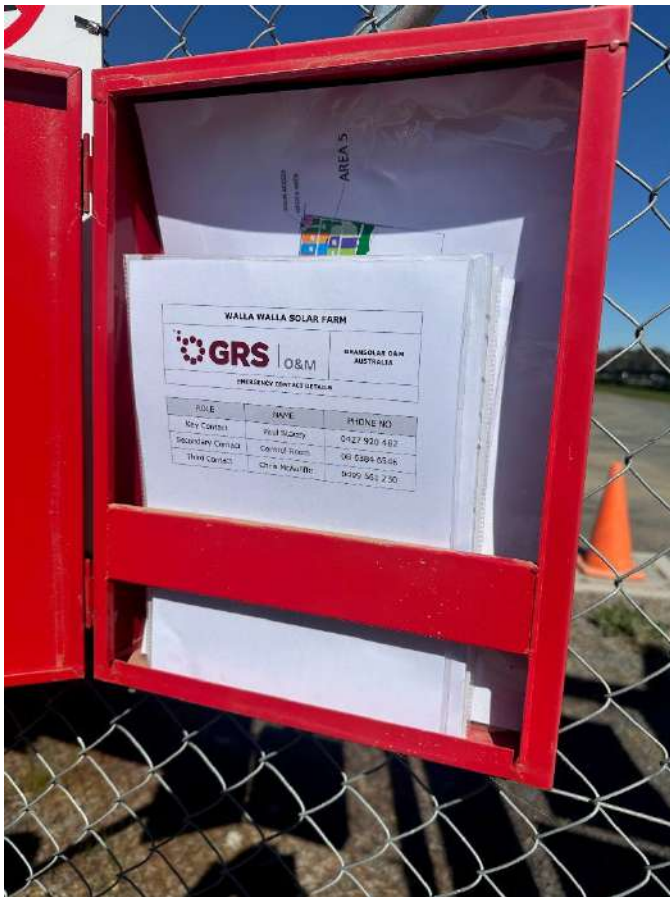
Photo 17: Ground cover/regrowth between the solar panels



Photo 18: Fire refuge area and emergency assembly point



Photo 19: 50,000L fire water tank



Photos 20 and 20b – Emergency response plan and contact information at site entrance



Photo 21: – Chemical fuel storage and spill kits



Photo 22 – Waste storage containers



Photo 23 – permanent stormwater culvert and rock scour protection



Photo 24— permanent stormwater culvert and rock scour protection



Photo 25 – stabilised site entrance and rumble grid



Photo 26: Recycled water tanks and site sheds, painted green



Photo 27: Back Creek fencing installation



Photo 28: Back Creek landscaping



Photo 27: Office safety lighting

Appendix D Stakeholder Consultation Records

richard.peterson-trigalana@outlook.com

From: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Sent: Tuesday, 29 July 2025 9:48 AM
To: Richard Peterson
Cc: DPE PSVC Compliance Mailbox
Subject: RE: SSD 9874 - Walla Walla Solar Farm - Operational Audit

Good morning Richard,

NSW Planning would like the below agencies to be consulted:

Greater Hume Shire Council
TfNSW
Conservation Programs, Heritage and Regulation (formerly BCD)
DPIE Water
Fire and Rescue NSW
RFS
Heritage NSW Division within Department of Premier and Cabinet

Areas to focus on to include:

Specific conditions relating to the operations phase of the development.
Road assessments requirements such as dilapidation reports etc required after construction (condition 8).
Rehabilitation on site and the removal of all topsoil mounds and rehabilitation of those areas.
Progress and monitoring of landscaping requirements (condition 11, 12 and 13)
Compliance with EIS commitments for operational phase of the development.
Evidence of compliance with commitments, reporting and monitoring requirements in the Landscape Management Plan, Heritage Management Plan and Biodiversity Management Plan.
Evidence of compliance, education, consultation and implementation of conditions 31 and 32 (relating to operating conditions and emergency).
Compliance with VPA requirements.

Regards
Katrina

Katrina O'Reilly
Team Leader
Development Assessment
Department of Planning, Housing and Infrastructure

M 0429400261 | **E** katrina.oreilly@planning.nsw.gov.au

dpie.nsw.gov.au

From: South West Planning Mailbox <planning.southwest@environment.nsw.gov.au>
Sent: Friday, 15 August 2025 3:26 PM
To: Richard Peterson
Cc: Simon Maffei
Subject: RD Response RE: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Hi Richard,

Thank you for seeking our input into the upcoming audit.

Please review the following as part of your audit:

Schedule 3, Condition 16 – BMP Implementation

- Confirm that the mitigation measures outlined in Table 2-2 of the Biodiversity Management Plan are being implemented as stated. Specifically:
 - LU4 – Is Pest and Weed Management being implemented?
 - BD17 – Have retained dams been planted with native riparian vegetation?
- Confirm that the Biodiversity Enhancement works outlined in Tables 6-1 and 6-4 of the Biodiversity Management Plan are being completed as proposed. Specifically:
 - Back Creek – Has the riparian area been fenced and planted?
 - Dams 1, 2, 3, 6, 8, 9 – Has planting with tubestock occurred?

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

Regards

Andrew Fisher

Senior Team Leader, Planning - South West
Regional Delivery
Conservation Programs, Heritage and Regulation Group
Department of Climate Change, Energy, the Environment and Water
T 02 6022 0623 **M** 0427 562 844 **E** andrew.fisher@environment.nsw.gov.au
620 Macauley St, Albury NSW 2640
www.environment.nsw.gov.au



Contact the South West Planning Team about biodiversity and flood management planning in south-western NSW by emailing planning.southwest@environment.nsw.gov.au

From: Richard Peterson <richard.peterson-trigalana@outlook.com>
Sent: Tuesday, 5 August 2025 8:50 AM
To: Richard Peterson <richard.peterson-trigalana@outlook.com>; Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>
Cc: Simon Maffei <Simon.Maffei@environment.nsw.gov.au>; Michael Todd <Michael.Todd@environment.nsw.gov.au>
Subject: Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

Our ref: OUT25/10103

Richard Peterson

Trigalana Environmental Pty

Email: Richard.peterson-trigalana@outlook.com

11/08/2025

Subject: Walla Walla Solar Farm – Operational Environmental Audit – SSD-9874

Dear Richard Peterson,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, “Independent Audit Post Approval Requirements (2020)” extends to at least the following:

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

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

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

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

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

SSD 9874 - Walla Walla Solar Farm - Operational Audit

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Mon 28/07/2025 12:37 PM

To Katrina O'Reilly <katrina.oreilly@planning.nsw.gov.au>

Cc DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Hi Katrina,

Hope you are well

Further to the DPHI letter of approval dated 23/07/25, I am planning to undertake the operational 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 31st of August 2025

The audit will be undertaken in accordance with the DPHI 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 14/8/25.

If any questions, please call me on the number below



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: Richard.peterson-trigalana@outlook.com

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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Tue 5/08/2025 8:49 AM

To Richard Peterson <richard.peterson-trigalana@outlook.com>; andrew.fisher@environment.nsw.gov.au
<andrew.fisher@environment.nsw.gov.au>

Cc Simon Maffei <Simon.Maffei@environment.nsw.gov.au>; Michael Todd
<Michael.Todd@environment.nsw.gov.au>

Hi Andrew,

Not sure if you are still the correct contact person?

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. The audit is required within 3 months of the commencement of operation.

This link [FRV Walla Walla Solar Farm | Home](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent \(nsw.gov.au\)](#) - (focussing on the operational aspects) and in accordance with the DPHI Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit Post Approval Requirements | Planning](#)

I am planning on undertaking the audit on the 19th August 2025 and as part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with Conservation Programs, Heritage and Regulation 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 18 August 2025 (if possible) 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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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Tue 5/08/2025 8:33 AM

To OEH HD Heritage Mailbox <heritagemailbox@environment.nsw.gov.au>

To whom it may concern,

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. The audit is required within 3 months of the commencement of operation.

This link [FRV Walla Walla Solar Farm | Home](#) provides details of the location and general project information.

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I am planning on undertaking the audit on the 19th August 2025 and as part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with Heritage NSW 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 18 August 2025 (if possible) that would be greatly appreciated.

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

Many thanks and Regards.



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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Fri 15/08/2025 3:11 PM

To info@fire.nsw.gov.au <info@fire.nsw.gov.au>

To NSW Fire and Rescue

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. The audit is required within 3 months of the commencement of operation.

This link [FRV Walla Walla Solar Farm | Home](#) provides details of the location and general project information.

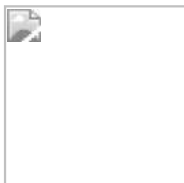
The audit is to be undertaken of the Project Conditions of Approval [getContent\(nsw.gov.au\)](#) - (focussing on the operational aspects) and in accordance with the DPHI Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit Post Approval Requirements | Planning](#)

As part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with the NSW Fire and Rescue 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 30 August 2025 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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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Tue 5/08/2025 8:26 AM

To mail@greaterhume.nsw.gov.au <mail@greaterhume.nsw.gov.au> <mail@greaterhume.nsw.gov.au>

To whom it may concern,

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I am planning on undertaking the audit on the 19th August 2025 and as part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with Council so any issues or focus areas you have may be considered by the audit.

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Many thanks and Regards.



Richard Peterson | Director

Trigalana Environmental Pty Ltd

M: 0429 227 775

E: [Richard.peterson-trigalana@outlook.com](mailto:richard.peterson-trigalana@outlook.com)

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To OEH HD Heritage Mailbox <heritagemailbox@environment.nsw.gov.au>

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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Fri 15/08/2025 3:02 PM

To southernborder.team@rfs.nsw.gov.au <southernborder.team@rfs.nsw.gov.au>

To The Rural Fire Service,

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. The audit is required within 3 months of the commencement of operation.

This link [FRV Walla Walla Solar Farm | Home](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent\(nsw.gov.au\)](#) - (focussing on the operational aspects) and in accordance with the DPHI Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit Post Approval Requirements | Planning](#)

As part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with the Rural Fire Service 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 30 August 2025 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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Walla Walla Solar Farm - Independent Environmental Audit (SSD 9874)

From Richard Peterson <richard.peterson-trigalana@outlook.com>

Date Fri 15/08/2025 3:22 PM

To development.renewables@transport.nsw.gov.au <development.renewables@transport.nsw.gov.au>

To Transport for NSW

I have recently been appointed to undertake an Independent Audit of the Walla Walla Solar Farm in NSW. The audit is required within 3 months of the commencement of operation.

This link [FRV Walla Walla Solar Farm | Home](#) provides details of the location and general project information.

The audit is to be undertaken of the Project Conditions of Approval [getContent\(nsw.gov.au\)](#) - (focussing on the operational aspects) and in accordance with the DPHI Post Approval (Independent Audit Requirements) Independent Audit Guidelines [Independent Audit Post Approval Requirements | Planning](#)

As part of the audit, the NSW Department of Planning, Housing and Infrastructure have requested I consult with Transport 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 30 August 2025 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](mailto:richard.peterson-trigalana@outlook.com)

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Appendix E Auditor Declaration

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	7 October 2025

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

