

Ref	Recommendation	NDBPL Response 5 February 2021	Timeline
NON-COMPLIANCE RECOMMENDATIONS			
Sch 3 Cond 7	- Update the 'Extended Hours Work Approval' (Goldwind, 2020) to clearly stipulate what the proponent considers to be an audible level at the closest private receiver(s) or representative location (if monitoring is not available due to access) - Ensure written approval from DPIE received prior to undertaking any audible works for out of hour works. - Consider seeking a modification to development consent which defines 'inaudible' relative to background levels (consistent with contemporary wind farm approvals) in the context of the condition.	For the reasons set out in NDBPL's letter to DPIE and the EPA dated 14 July 2020, NDBPL does not consider that there has been any non-compliance with condition 7 of schedule 3 of the development consent. However, NDBPL notes that it is difficult for the auditor to assign an appropriate 'Compliance status descriptor' under the Independent Audit Post Approval guidelines (June 2018) where there are alleged non-compliances, without sufficient verifiable evidence to confirm the works were 'inaudible' at non-associated residences. NDBPL note that in this instance; an inaudible level is not defined in SSD 6039, and representative monitoring locations were not available due to restrictions in accessing private property at the complainants receptor location. Some activities were carried out on the basis that they were considered to be inaudible at non-associated residences, however in consultation with DPIE and EPA we agreed to cease the planned out of hour works after complaints were received and it was not possible to verify whether works were audible or inaudible at the complainants residence. NDBPL takes its compliance obligations very seriously and is committed to continuing to comply with all conditions of its development consent. Accordingly, the recommendations of the auditor will be fully implemented by NDBPL.	N/A
CONTINUAL IMPROVEMENT RECOMMENDATIONS			
Sch 2 Cond 3	- Consider if the Development Layout in Appendix 2 of SSD 6039 should be updated to be consistent with the MOD2 Map supplied by TM dated 2/8/19. - Update Modification 2 date on consent to 9/1/20.	NDBPL updated the Development Layout as requested by DPIE during the MOD 2 determination process. NDBPL will update the plan further if DPIE confirm that the items not shown on the plan are items the DPIE think should be shown on the plan. NDBPL will update this if DPIE agree that it should occur.	TBC TBC
Sch 3 Cond 16	Ensure that 'crane tracking disturbance resulting on 30/07/20 is remediated asap to satisfaction of landowner and sedimentation control retained to until area fully stabilised.	To achieve the best remediation results, this area has been left to dry out. This was recommended by the landowners agronomist. In the meantime, a fence has been installed around the area in order that stock do not enter. Final reinstatement of topsoil and reseedling will occur between February and April 2021. This timing will maximise regrowth during the Autumn. Sediment control remains in place and will continue to be maintained until the remediation work is undertaken and vegetation growth is adequate	Remediation works will occur by April 2021.
Sch 3 Cond 17c)	The T30/31 culvert off bank requires ongoing work and stabilisation (Plate 16). Since the site inspection, Newtricity has undertaken additional works in this area as detailed in Appendix C	Newtricity confirms significant works were undertaken since the auditor's inspection. Temporary erosion controls will remain in place until area is stable. Ongoing inspections are being carried out.	By December 2021
Sch 3 Cond 17d)	Provide refresher training to relevant personnel as to the requirement for bunding for potentially hazardous materials and inspections conducted to confirm compliance.	NDBPL confirms the refresher training was conducted by Goldwind on 1st February 2021.	Completed 1 February 2021
Sch 3 Cond 20	Recommend BCD consultation is included as an appendix of the BMP at the next update.	The revised BMP was approved by DPIE in May 2020. Section 1.6 of the BMP includes a table record of consultation with BCD. However, NDBPL will include the consultation record with BCD as an appendix, if the DPIE agrees that it would be beneficial.	TBC

Sch 3 Cond 23	Update Table 7.1 of the ACHMP when next revised to remove Aboriginal sites that have been salvaged (may retain detail in an Appendix) so practically relevant for operations phase.	The ACHMP includes a comprehensive figure (Figure D.2) which explains which sites have been salvaged. This plan is referred to in operational documentation and addresses the concern raised by the auditor. Nevertheless, NDPBL is willing to revise Table 7.1 if the DPIE agrees that it would be beneficial.	N/A
Sch 3 Cond 35c)	- Refresher training for handling of wastes and clear labelling of bins when at Construction and/or O&M Compounds. Since the site inspection, the Daily Prestart Form has been updated to include instructions for correct use of waste. - Residual waste materials and discarded blade support frames identified during the site inspection (see Plate 25 and Plate 27) should be removed during final clean-up.	NDBPL confirms the refresher training was conducted by Goldwind on 1st February 2021.	Completed 1 February 2021
		NDBPL confirms that the materials mentioned will be removed at the end of construction and will be disposed of appropriately.	By April 2021
Sch 3 Cond 37	- Installation of signage and sediment fencing around topsoil stockpile located on private property (Plate 6) until the landowner removes the stockpile. - Shape and seed the stockpile located near the O&M Compound (Plate 7) if left open for more than four to six months to ensure stability and reduce sediment and erosion control. - Monitor 'Borrow Pit' rehabilitation area to ensure rehabilitation successful.	NDBPL confirms that the signage and sediment fence has been installed and is being maintained.	Installed 4 February 2021
		The stockpile has been used for rehabilitation, so has not been left open without being accessed for greater than 4 months. The remaining topsoil will be used in the rehabilitation of the site compound area which is expected to occur by the end of March 2021. The location referenced by the auditor was a laydown area used during construction of the project, and in accordance with SSD 6039 and the Final Layout Plan. This location was not a 'Borrow Pit'. Rehabilitation will be monitored until successful rehabilitation in accordance with the BMP. Further revegetation measures will be implemented if required.	By March 2021 By December 2021
Sch 4 Cond 1	Update Environmental Management Strategy (EMS) for operations, should personnel and responsibilities change.	The EMS already accounts for the Operational Phase, however, NDPBL agrees that attention needs to be given to changes in personnel and responsibilities, should such changes occur. NDPBL will review the EMS within 3 months from commencement of operation, and commits to making any further changes required.	By December 2021
Sch 4 Cond 2	Keep a register which records that this condition was considered for each strategy/plan/program after each incident, audit and modification to demonstrate compliance for future audits.	NDBPL maintains a register and it can be provided to the DPIE upon request.	Ongoing