

Land Management Plan Suntop Solar Farm

transport | community | mining | industrial | food & beverage | energy



Prepared for:

Client representative:

Date:

Photon Energy Australia Pty Ltd

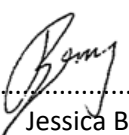
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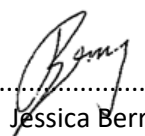
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Table of Contents

1.	Introduction	1
1.1	Purpose of the Report.....	1
1.2	Objectives.....	1
1.3	Post-Approval Implementation.....	1
1.4	Interactions with Other Documents	1
2.	The Proponent.....	1
3.	The Proposal.....	2
3.1	Overview	2
3.2	Construction Activities	4
3.3	Operational Activities.....	5
3.4	Existing Environment	5
4.	Land Management Activities.....	7
4.1	Grazing Activities.....	7
4.2	Cropping Activities	7
5.	Ownership	7
5.1	Structure and Responsibility	7
6.	Approvals and Licensing.....	8
6.1	Conditions of Approval	8
7.	Implementation.....	8
7.1	Risk Assessment	8
7.2	Management Activities and Controls.....	9
8.	Remediation Plan	13
9.	Audit and Quality Management.....	14
9.1	Review.....	14
9.2	Records.....	14

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1. Introduction

1.1 Purpose of the Report

The purpose of this Suntop Solar Farm Land Management Plan (LMP) is to develop a framework for the ongoing management of land, water and vegetation within the site (the “Subject Land”) and describe the following components to ensure that land management is undertaken in the most appropriate manner throughout all phases of the Project:

- Provide a brief description of the Proposal and the existing environment (Section 3)
- Identify and document the existing operations, and conditions of the Site (Section 3 and 4)
- Identify critical stakeholders (Section 5)
- Outline the applicable approvals and licencing conditions (Section 6)
- Implement appropriate management measures to ensure the management of land within the Site is maintained (Section 7)
- Provide a methodology for the remediation of land following decommissioning of the Proposal (Section 8)
- Outline reporting procedures to gauge management measure effectiveness (Section 9).

1.2 Objectives

The objective of this LMP is to provide a documented system that will help ensure all land management requirements and commitments made during the approvals process are collated within this document and implemented when operating the Suntop Solar Farm.

1.3 Post-Approval Implementation

It is anticipated that following approval being given to the Proposal by the Department of Planning and Environment (DP&E), conditions of approval would likely relate to the requirement of this LMP to be updated, reviewed, approved and implemented either under, or within, the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP).

As a result of this, this document would be amended post-approval to reflect the specific conditions or management measures outlined within any approval documents and requirements.

1.4 Interactions with Other Documents

This LMP is a supporting document to the Suntop Solar Farm Environmental Impact Statement (EIS), 2018 and should be read in conjunction with the EIS and specialist reports provided as part of the EIS.

Specific management measures relating to surface water, erosion and sediment controls etcetera would be incorporated into the overarching CEMP, OEMP and other specific management plans as required.

2. The Proponent

The proponent is Suntop Solar Farm (SSF) which is owned by three companies including Photon Energy, Canadian Solar and Polpo Investments.

3. The Proposal

This section outlines a broad explanation of the Suntop Solar Farm (the 'Proposal'), defines the projects boundaries and identifies existing operations and environmental conditions within the Subject Land.

3.1 Overview

SSF propose to construct and operate a 200-megawatt (MW) solar farm using photovoltaic (PV) technology, comprising a total of 472 hectares in Wellington, NSW. The Proposal would be located at 909 Suntop Road, Wellington, NSW 2820 and contained within Lot 1-2 and part Lot 3 DP 506925, Lot 122 DP 753238 and Lot 90 DP 657805.

The Proposal is located within the Dubbo Local Government Area (LGA) and is approximately 10km south-west from the Wellington town centre.

The solar farm and its ancillary components would occupy a total of 472 hectares out of the total land holdings of 517 hectares (equivalent to approximately 92% of the available land) and is hereafter referred to as the "Site". Figure 1: The Proposal provides an overview of the Proposal.

Up to 550,000 PV panels would be installed on a single axis tracker system across the Site. The single axis tracker system option would consist of groups of east-west facing PV modules tilted at +/- 60° angle (each approximately 2m x 1m in area) on mounting structures approximately 2m in height and in rows approximately 11m apart. The mounting structure would be piled steel posts that would extend between 1.6m to 4m below ground depending on geological conditions. The maximum height of panels during tracking movement is up to 4m.

The major additional components of the Proposal required to support the construction and operation of the Proposal are outlined below.

- Construction of a new main access road for all access and egress to the Site and related facilities
- Installation of electrical infrastructure including:
 - A new 132kV Substation
 - Inverters to collect and convert DC to AC
 - Cabling and other electrical infrastructure (e.g. security systems)
- A maintenance compound and ancillary buildings
- Fencing, landscaping and environmental works.

Power generated by the facility will be initially transmitted from the new 132kV substation to the existing 132kV transmission lines via a 'tee-off' (an electrical connector that joins electrical cables into existing electrical lines), along an easement owned by TransGrid that traverses the Site, before extending through to the Wellington substation, located approximately 15 kilometres to the north.

The operational life of the Proposal is expected to be 30 years at which point the panels are either replaced and operations continue (pending subsequent extension approvals) or decommissioned, removed from Site and ultimately rehabilitated as required.

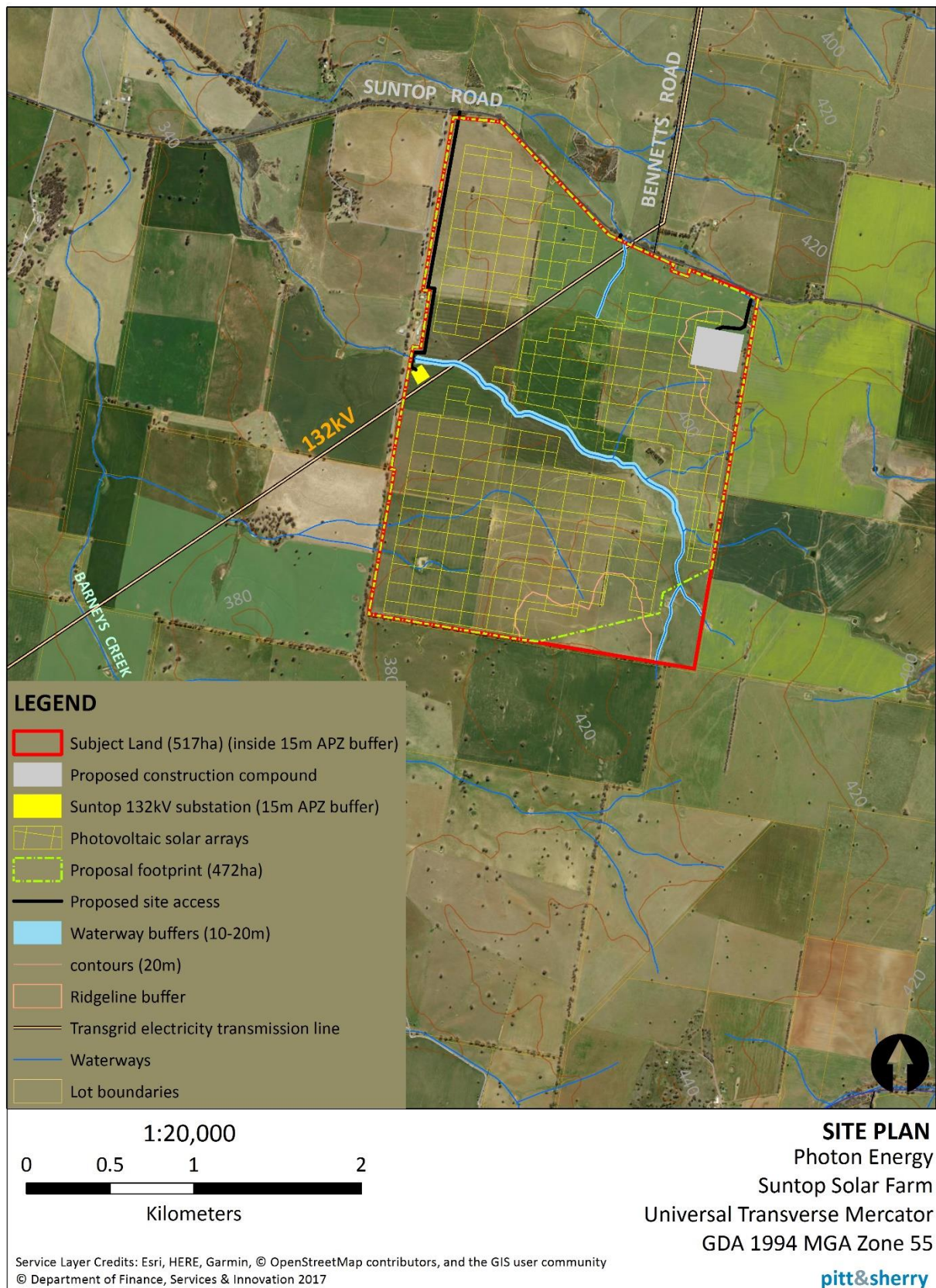


Figure 1: The Proposal

3.2 Construction Activities

The construction and commissioning phase is expected to last approximately 12 months. The main construction activities are outlined in Table 1.

Table 1: Main Construction Activities

Stage	Main activities
Site Establishment	<ul style="list-style-type: none"> • Installation of new access road • Installation of security measures including fencing • Establishment of site compound, material layout and equipment wash down areas • Ground preparation • Installation of environmental controls in accordance with a detailed Construction Environmental Management Plan (CEMP) • Minor vegetation clearing (grasses, shrubs and groundcover) • Targeted clearance of low laying vegetation around trenching areas • Pile driven installation of PV mounting structures to minimise disturbance to existing ground cover • Establishment of tree and vegetation buffer protection measures as required • Establishment of additional sedimentation and erosion controls as required.
Preliminary civil works	<ul style="list-style-type: none"> • Setting up foundations for the substation and inverter stations • Drainage works (as required).
Install PV systems and cables	<ul style="list-style-type: none"> • Installation of steel post and rail foundation system for the solar panels • Installation of PV panels and DC wiring beneath the panels • Installation of electrical cabling including trenching for underground cabling and installation of inverter stations.
Construction of 132kV substation and new transmission line	<ul style="list-style-type: none"> • Site establishment and clearing (if required) • Bulk earthworks • Detailed civil works including earthing, foundations • Erection of steelwork, equipment, demountable buildings and transformers • Electrical connections • Install new poles • Transmission line stringing for new conductor and optical ground wire (OPGW) from substation to existing 132 kV transmission line.
Rehabilitation and Commissioning	<ul style="list-style-type: none"> • Testing of electrical infrastructure • Removal of temporary construction facilities and rehabilitation of disturbed areas • Undertake appropriate rehabilitation to be outlined in the CEMP.

3.3 Operational Activities

Operational activities are to immediately follow the construction and installation stages. Once operational, activities would include daily operations and maintenance, including the following.

- Remote 24/7 on-line monitoring
- Scheduled visual inspections and general maintenance
- Repair and cleaning operations of the PV arrays (as required)
- Replacement of equipment and infrastructure, as required
- Land management monitoring and activities including:
 - Livestock and grazing management
 - Maintenance of vegetation (including groundcover and pasture improvement)
 - Weed and feral animal control
 - Soil monitoring and improvement (if required).

3.4 Existing Environment

The following subheadings outline the existing site operations that occur within the Site and existing environmental conditions.

3.4.1 Existing Operations

The Subject Land, as shown in Figure 2, comprises a series of large fenced paddocks containing cereal crops and grazing cattle livestock. The paddocks have been largely cleared for agricultural purposes with a series of constructed earthworks in the form of rollover banks being placed across the Site. The property also contains several built structures including agricultural sheds, one residential dwelling and grain silos.

Section 4 provides further details regarding specific land management activities undertaken within the Subject Land.

3.4.2 Existing Site Conditions

Vegetation

The majority of the Subject Land has been previously cleared for historical cropping (i.e. wheat, oats, canola and Lucerne) and grazing purposes (cattle and sheep) with limited native vegetation remaining. As such, the area contains minimal native vegetation with the local surface hydrology, landform and soils have been heavily modified by the paddock development. There are however, several small scattered rows and isolated clumps of vegetation across the Subject Land, including 28 native scattered paddock trees, comprised of the following:

- Fuzzy Box (*Eucalyptus conica*)
- White Box (*Eucalyptus albens*)
- Kurrajong (*Brachychiton populneus*)
- White Cypress Pine (*Callitris glaucophylla*).

A total of eight dams exist within the Subject Land, ranging from 0.2ha to 0.5ha.



Figure 2: Typical Existing Site Conditions

Soils

The majority of soils on the land have been extensively disturbed by agricultural activities such as clearing for grazing and rotational cultivation. The soils are described as quite deep and relatively well drained with limited constraints. Generally, the soils do not present any major physical or chemical constraints that cannot be managed.

Chemical analysis of soil samples indicate that potential issues can be easily rectified with the application of an ameliorant such as lime for pH issues or targeted addition of nutrients for fertility. The soil tests also show that the existing soils can be prone to soil erodibility when left unvegetated due to K factors, although the overall erosion hazard is low due to climate and landform factors.

See Appendix K of the EIS for further details including soil sampling results and Section 6.8 for detailed soil management measures.

Weather

To assist with any improvement of pasture works and management of the site generally, weather data has been reviewed to determine suitable pasture species.

Generally in Wellington, Summer temperatures extend to a maximum mean of 31.2°C and down to a mean minimum of 3.4°C in winter. Median rainfall is Summer dominant with the highest totals in the Spring/Summer months and lowest throughout the winter months. The long term median annual average rainfall is 620 mm.

The varying temperature and rainfall conditions in the area can have a significant impact on summer growing species. It is therefore very important that any pasture established would have a mix of both Summer and Winter growing species.

4. Land Management Activities

4.1 Grazing Activities

Existing sheep grazing activities would continue to occur alongside the areas occupied by solar infrastructure. These grazing activities would ensure the ongoing management of pasture grasses within the Site.

The existing surface water infrastructure within the Site (i.e. existing dams and bore) would continue to be utilised for stock watering with no changes anticipated.

4.2 Cropping Activities

It is anticipated that any cropping activities within the Site would cease following the Proposal being approved due to potential proximity issues between solar farm infrastructure and any cropping machinery. The Site would essentially be allowed to return to pasture whilst solar operations are undertaken throughout the life of the Project.

Depending upon the decommissioning and remediation decisions following the proposed 30-year solar farm consent life, if it is determined that cropping would be recommenced, this would be undertaken in accordance with a closure plan and in consultation with the landowner/operator.

5. Ownership

5.1 Structure and Responsibility

The carriage and use of this plan would be the responsibility of SSF and the onsite management representative, whether it be a SSF employee or contractor.

5.1.1 Property Owner

SSF has a purchase agreement with the landholders for Lots 1, 2 and part Lot 3 DP 506925, Lot 122 DP 753238 and Lot 90 DP 657805. A reconfiguration of the above lots is proposed as part of the purchase agreement, such that a reconfiguration would allow the current Landowner to operate separately from the proposed solar farm.

It is proposed that the purchase arrangement will involve the joining of Lots 1, 2 and part Lot 3 DP 506925, Lot 122 DP 753238 and Lot 90 DP 657805 to create a new 513ha lot of which SSF will own. A 4ha section of Lot 3 DP 506925 will create the new subdivision that will be owned by the current landowner.

Electricity Infrastructure Owner.

TransGrid operates and manages a large portion of the major high voltage electricity transmission network in NSW and the ACT, connecting power generators, distributors and major end users. Their core role is to connect electricity consumers to a safe, secure and reliable network through efficient maintenance and effective operation and management of electricity supply assets.

The Suntop Solar Farm will connect into the existing TransGrid 132 kV network. The easement for this network runs from north to south through the Site.

5.1.2 Contractors

Details of the contractor will be included when they are available.

5.1.3 Government Agencies

Agency consultation as part of the LMP would be limited to that required by specific conditions or to clarify specific issues. In recognition of this, the LMP would likely be prepared in consultation with the following list of agencies as relevant.

- Dubbo Regional Council
- NSW DPE
- NSW OEH.

6. Approvals and Licensing

Compliance with all relevant approvals and licences would be addressed in the OEMP. Table 2 provides a list of the likely key legal instruments relevant to the requirements of the LMP.

Table 2: Legislation reference for requirements of the LMP

Legal Instrument	Reference to LMP
<i>Environmental Planning and Assessment Act 1979</i>	Compliance with Conditions of Approval
<i>Protection of the Environment Operations Act 1997</i>	No pollution of waters Reporting environmental harm
<i>Waste Avoidance and Resource Recovery Act 2001</i>	Appropriate disposal of waste to a lawful facility
<i>Noxious Weeds Act 1993</i>	Treatment of noxious weeds
<i>Rural Fires Act 1997</i>	Compliance with Rural Fire Service directives

6.1 Conditions of Approval

Conditions of approval would be identified and addressed once specific conditions have been assigned to the Project.

7. Implementation

7.1 Risk Assessment

Potential impacts in relation to land management from the Suntop Solar Farm have been identified through consideration of the operations to be undertaken on site, along with issues identified in the EIS, specifically Chapter 6 Environmental Impact Assessment.

The potential impacts from these issues are treated as risks and need to be managed through environmental management activities, monitoring and controls which can be implemented to prevent or reduce the risks of the issues occurring.

Potential risks identified from the operation of the Suntop Solar Farm associated with land management practices, and addressed by this LMP, are outlined below:

- Loss of productive agricultural land. See Section 7.2.1
- Management of ongoing grazing activities. See Section 7.2.2
- Maintenance of adequate and suitable groundcover (e.g. pasture for grazing). See Section 7.2.3
- Weed and feral animal management. See Section 7.2.4

- Disturbances to soil and generation of dust. See Section 7.2.5
- Management of fuel loads and potential for bushfires. See Section 7.2.6.

Other operational risks identified in the EIS would be addressed in the CEMP, including incident response and management.

7.2 Management Activities and Controls

This section of the LMP details the environmental management activities, mitigation and control measures that would be used to prevent or minimise environmental risks and impacts associated with the management of the land.

Due to the similar nature of environmental controls to be implemented within the construction and operational phases of the Proposal in regard to land management, the following management activities and controls relate to both construction and operational phases.

Remediation of the Site is discussed within Section 8; however, it is expected that these management activities would be expanded upon within a separate Remediation Plan, a document that would be compiled and subsequently approved prior to any decommissioning activities towards the end of the Proposal's lifespan.

Specific management measures regarding erosion and sediment control, noise, etc. (i.e. non-land management related issues) are discussed within the EIS and would be managed in accordance with their own specific management plans (to be outlined within the Project's Conditions of Approval) and CEMP / OEMP. As a result of this, these specific measures are not discussed further in this document.

7.2.1 Agricultural Land Management

Objective

Ensure the potential loss of available agricultural land is minimised whilst ensuring that agricultural land is utilised for agricultural purposes within the Site where possible.

Management Measures

Managed grazing would continue within the Site by being used to maintain the height of ground cover during operation of the solar farm (see Section 7.2.2), in accordance with the permissible thresholds detailed within the vegetation and soil monitoring programs.

Following decommissioning activities and owing to the reversible nature of the Proposal, the land would be returned to its former agricultural use of grazing and cropping.

7.2.2 Grazing Management

Objective

Utilise stock grazing within the Site to continue the use the available land for agricultural purposes, whilst also minimising maintenance costs and reduce the requirement for slashing / herbicide use.

Management Measures and Monitoring

Grazing management and practicalities will be developed in consultation with the stock provider and updated as part of this LMP prior to commencement of operation. Strategic internal electric fencing and access to watering points would be discussed with the stock provider with management of grazing live stock.

This would include details of the grazing regime (i.e. when sheep arrived, head numbers and when they were taken off the site) or the date of mechanical slashing and the location of the activity carried out.

7.2.3 Vegetation Management

Objective

Establish and maintain groundcover suitable for grazing with minimal weed incursion over the Solar Farm footprint that does not create or increase a fuel hazard and minimises the potential for erosion and sediment laden runoff.

Management Measures

Due to the existing environment in which the majority of the Site has a base groundcover of vegetation, the following measures relate to pasture improvement in order to maintain or exceed the proposed 80% of groundcover across the Site that would be suitable for grazing activities. Management measures to maintain suitable groundcover for grazing purposes are outlined below.

- A baseline of site vegetation conditions would be recorded prior to construction operations.
- Prior to any construction or grazing activities, the Subject Land would require at least an 80% groundcover of vegetation, including grasses and legumes, and assisted by fertiliser activities if required. Suitable grass and legume species are identified in Table 3.

Table 3: Appropriate Groundcover Vegetation Species

Grass	Legumes		
<ul style="list-style-type: none"> • Phalaris (<i>Phalaris aquatica</i>) • Cocksfoot (<i>Dactylis glomerata</i>) • Fescue (<i>Festuca arundinacea</i>) 	<ul style="list-style-type: none"> • Lucerne (<i>Medicago sativa</i>) • Snail medic (<i>Medicago scutellata</i>) • Barrel medic (<i>Medicago truncatula</i>) • Biserrula (<i>Biserrula pelecinus</i>) 	<ul style="list-style-type: none"> • Sub clover (<i>Trifolium subterraneum</i>) • Rose clover (<i>Trifolium hirtum</i>) • Serradella (<i>Ornithopus spp.</i>) • Disc/Strand hybrid medic (<i>Medicago tornata/ littoralis</i>) 	<ul style="list-style-type: none"> • Gland clover (<i>Trifolium glanduferum</i>) • Sulla (<i>Hedysarum coronarium</i>) • Arrowleaf clover (<i>Trifolium vesiculosum</i>) • Purple clover (<i>Trifolium purpureum</i>)

- Revegetation activities would be undertaken upon land that has been disturbed as a direct result of construction activities (i.e. trenching)
- If any seasonal factors or overgrazing lead to a drop in vegetative cover stock grazing would be managed accordingly
- No grazing would occur until plants are initially higher than 15 cm.

Monitoring

To enable an effective groundcover being established and maintained over the life of the Proposal, a monitoring program would be implemented and involve visual analysis as outlined within Table 4 (pre-construction) and Table 5 (operational). Following the visual analysis, areas requiring improvement would be identified within a register, along with an accurate location plan, before measures are implemented to improve the health of the groundcover vegetation. Follow up monitoring would also occur to ensure the

ameliorative measures implemented are successful before any further grazing works occur within these areas.

The results of the vegetation groundcover monitoring program would be collected as part of the ongoing monitoring program and record keeping for the operation.

The location component of the monitoring program would consist of representative plots being identified following the completion of construction works. These locations would be recorded on a map, similar to Figure 1. Opportunistic monitoring at other locations would also be undertaken as required, if it was identified that vegetation parameters varied from any established baselines during the operational phase.

Table 4: Vegetation Monitoring Program – Pre-construction Stage

Vegetation Parameter	On site Methodology	Location
Vegetation Type	Onsite – visual	
Groundcover Type	Onsite – visual	
80% groundcover	Onsite – visual	
Weed species present	Onsite – visual	
Species composition	Onsite – visual	

Table 5: Vegetation Monitoring Program – Operational Stage

Vegetation Parameter	On site Methodology	Frequency	Location
Bare patches / scalds	Onsite – visual	Monthly	
Vegetation condition	Onsite – visual	Monthly	
80% groundcover	Onsite – visual	Monthly	
Weed species present	Onsite – visual	Monthly	
Species composition	Onsite – visual	Annual	

If it is identified from the monitoring program that vegetation is being affected by grazing, cattle/sheep would be removed from the identified areas of land until groundcover has re-established to appropriate levels (i.e. 80% groundcover and/or appropriate species compositions). A revised grazing plan would be implemented to ensure that grazing activities are undertaken whilst maintaining 80% of vegetation groundcover.

Weeds would be identified and treated in accordance with Section 7.2.4.

7.2.4 Weed and Feral Animal Management

Objective

The objective of weed and feral animal management is to:

- Prevent the spread of noxious weeds and feral animals
- Ensure the operation of the Suntop Solar farm complies with the *Noxious Weeds Act 1993*.

Management Measures

Any noxious weed or feral animals detected on-site will be managed using appropriate methods.

Where this requires the application of pesticides, the Proponent would ensure an appropriately accredited (ChemCert) local contractor is engaged and a copy of the contractor's application treatment will be retained and filed on-site.

This treatment record would detail the date, chemical applied and at what rates, weather conditions and the weed species sprayed.

Noxious weeds as identified by the *Noxious Weeds Act 1993* will be notified to the relevant authority as required in accordance with the Act. If weeds are becoming an issue, advice will be sought from DPI or local agronomists of the best strategies.

Regular monitoring would be required, as weeds are more easily controlled when they first germinate, as outlined in Section 7.2.3.

The perimeter security fencing would provide a barrier for medium to large feral animals to entire the Site. Any smaller feral animals would be managed in accordance with standard rural feral management procedures.

Monitoring

The results of any weed removal and treatment operations would be reported as part of the ongoing vegetation monitoring program and record keeping for the operation, including location, date and type of species identified/targeted, treatment undertaken, any follow up treatment and sign off.

7.2.5 Soil Management

Objective

The objective of soil management on the Site is to minimise potential for impacts upon soil health including erosion and soil degradation.

Management Measures

Soil management measures are outlined below, noting that erosion and sediment control management measures would be included within the Soil and Water Management Plan.

- Maintain existing pasture vegetation beneath and surrounding the panels (excluding foundation points and internal access tracks) to be suitable and utilised for grazing purposes, ensuring limited potential for soil erosion to occur
- Monitor soil health through visual and chemical testing to improve soil health if deemed required, as outlined below:
 - Utilise ameliorants such as lime or organic mulches to adjust pH levels dependent upon acidity or alkalinity levels
 - Targeted addition of nutrients (i.e. fertilisers) to improve soil fertility levels
- Temporarily excavated soil and other materials that exhibit significant dust lift off would be wet down, stabilised or covered to manage dust.

Monitoring

To enable an effective analysis of soil over the life of the Proposal, a monitoring program would be implemented and utilise the existing baseline soil results to gauge overall soil health and coverage. The proposed monitoring program is outlined within Table 6 and would occur in locations that appropriately capture the health of the soil across the entirety of the Subject Land.

The results of the soil monitoring program and any related treatment operations would be reported as part of the ongoing monitoring program and record keeping for the operation.

Table 6: Soil Monitoring Program

Soil Parameter	On site / laboratory	Frequency
Bare patches / scalds	Onsite – visual	Monthly
Hard setting	Onsite – visual	Monthly
N, P, K, S	Laboratory	Annual
pH	Laboratory	Annual
ECe	Laboratory	Annual

7.2.6 Bushfire Management

Objective

The objective is to manage the occurrence of any bushfires and ensure the Site is managed accordingly during a bushfire.

Management Measures

EIS Section 6.9 provides a holistic detailed bushfire management section with the following information relating to land management activities should a bush fire occur.

- Construct and utilise an Asset Protection Zone (APZ) around all Site infrastructure
- Install a water supply tank with a capacity of 50,000L outside of the APZ suitable for firefighting uses
- Maintain vegetation fuel levels within the Site utilising grazing, slashing or mowing activities
- Develop an Emergency Response Plan (ERP) in consultation with NSW RFS District Control Centre prior to construction.

Monitoring

Bushfire monitoring activities such as fuel loads etc. will be collected within the vegetation monitoring program outlined in Table 4. External monitoring of known bush fires would be checked by the “fires near me” app for Wellington.

8. Remediation Plan

As has been documented in the Suntop Solar Farm EIS, the Solar Farm has a projected life span of 30 years. At this time, the infrastructure will be assessed and a decision will be made as to whether the Site will be refurbished to allow ongoing operation or to close and decommission the Site.

If the decision is made to decommission the Solar Farm, the Proponent has made a commitment to remove all above and below ground infrastructure and remediate the Site to allow it to be returned to its original use and condition as agricultural land. At this time a specific Site Remediation Plan would be compiled to ensure the removal of material from the Site is done in a structured and appropriate manner in accordance with relevant approvals and permits, and in conjunction with all necessary works and processes to return the Site to its pre- development condition.

The specifics of the Remediation Plan would be established prior to decommissioning and in consultation with relevant stakeholders including Council. The following aspects would be address in the plan:

- Remediation goals
- Discussion of the extent of remediation
- Discussion of possible remedial options and risk reduction
- Rationale for the selection of recommended remedial actions
- Proposed testing to validate the site after remediation
- Contingency plan if the selected remedial strategy fails
- Interim site management plan (before remediation), including
 - Fencing
 - erection of warning signs
 - stormwater diversion
- Site management plan (decommissioning phase) including:
 - Site stormwater management
 - Soil management
 - Noise control
 - Dust control
 - Vegetation management
 - Waste and Contaminated material management
 - Occupational health and safety plan
- Remediation schedule
- Hours of operation
- Contingency plans to respond to site incidents, to minimise potential impacts on the surrounding environment and community
- Identification of regulatory compliance requirements such as licences and approvals
- Names and phone numbers of appropriate personnel to contact during remediation
- Community Consultation
- Staged progress reporting, where appropriate
- Long-term site management plan.

9. Audit and Quality Management

9.1 Review

This management plan is to be reviewed at an agreed appropriate interval in conjunction with other relevant plans that are subject to review.

The review will include an assessment of the effectiveness of the established controls and their performance against the LMP's objectives. In addition, progressive amendments / updates will be made to this LMP as / if required.

9.2 Records

All records associated with this LMP are to be retained by the Proponent.



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