

## **SSD 9550 - Glenellen Solar Farm**

### **Independent Environmental Audit #2**

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Prepared for GPG Australia Pty Ltd

June 2025

# SSD 9550 - Glenellen Solar Farm

## Independent Environmental Audit #2

GPG Australia Pty Ltd (GPG)

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June 2025

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Approved by



**David Bone**

Auditor

June 2025

Level 3 175 Scott Street

Newcastle NSW 2300

ABN: 28 141 736 558

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## Executive Summary

EMM Consulting Pty Limited (EMM) was engaged by GPG via its subsidiary Glenellen Asset Pty Ltd as Trustee for Glenellen Asset Trust, to conduct an independent environmental audit (IEA) of the Glenellen Solar Farm (the Project). This IEA was completed to fulfil the requirements of the Development Consent SSD-9550 Modification 1 issued 23 August 2024.

This IEA was conducted in accordance with Condition C14 – C18 of SSD-9550. Condition C14 of Schedule 2 of the consent requires that an IEA be undertaken in accordance with the *Independent Audit Post Approval requirements* (IAPAR) (2020).

The first initial independent audit assessed compliance from the approval of the project (MOD 1) on 23 August 2024 up to 22 October 2024. Submission of the First Independent Audit Report and the proponent's response to the audit findings were submitted to the Department of Planning Housing and Infrastructure (DPHI) within two months of undertaking the independent audit site inspection in compliance with Condition C18.

This is the second construction audit for the site which commenced with a site inspection conducted on 15 April 2025. The objective of this audit is to assess compliance with the SSD-9550 approval during construction phase of the Project. This audit period assessed compliance from 23 October 2024 up to 15 April 2025. An extension of time for submission of the report was granted by DPHI due to auditor annual leave and public holidays occurring within the audit reporting period. The due date for submission of the report is 20 June 2025.

Following the site inspection, information provided was reviewed and the Project was considered generally compliant with the SSD-9550 conditions. Management and associated environmental programs in place were found to be adequate and implemented on site for the stage of the project at the time of the audit. Consultation with relevant agencies was also undertaken as part of the audit process.

Three (3) non-compliances were identified in relation to Out of hours work, dust management and waste management two (2) recommendations were also made relating to correcting revision numbers on documents and website links.

All of the NCR's were closed out by the proponent during the reporting period.

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# 1 Introduction

## 1.1 Background

The Project is located within in the Greater Hume local government area (LGA) 20 km north of Albury in southern NSW and 4 km northeast of Jindera in the southwestern slopes part of the NSW Murray Region. It is located within the Murray River catchment and drains to Hume Weir. The Project is situated on a Site that contains 398.4 ha of largely cleared agricultural land currently used mostly for grazing with some cultivation. Critical electricity infrastructure – in the form of an electrical substation – already exists on the Site (Figure 1.1). The Project is expected to have an electricity generation capacity of approximately 200 megawatts (MWAC), producing enough renewable energy to power the equivalent of 94,899 average NSW households each year.

The Project involves the construction and operation of a solar farm along with the upgrading and decommissioning of infrastructure and equipment over time. The Project would connect to the existing adjacent TransGrid substation located at Ortlipp Road. The inclusion of the existing TransGrid Jindera substation within the central western part of the Site provides the immediate opportunity to co-locate electricity generation with the point of connection to the TransGrid 330 kV network. This connection option will minimise the overall impact of the Project, while maximising the use of an existing connection asset.

EMM Consulting Pty Limited (EMM) was engaged by GPG to conduct an independent environmental audit (IEA) of the Glenellen Solar Farm (the Project). The Project incorporates construction and operation of a solar farm and associated infrastructure. The Project operates under State Significant Development Consent (SSD) 9550 which was originally granted approval by the NSW Independent Planning Commission on 15 December 2023. The consent has been modified, and the current development consent applicable to development is Mod 1 approved on 23 August 2024.

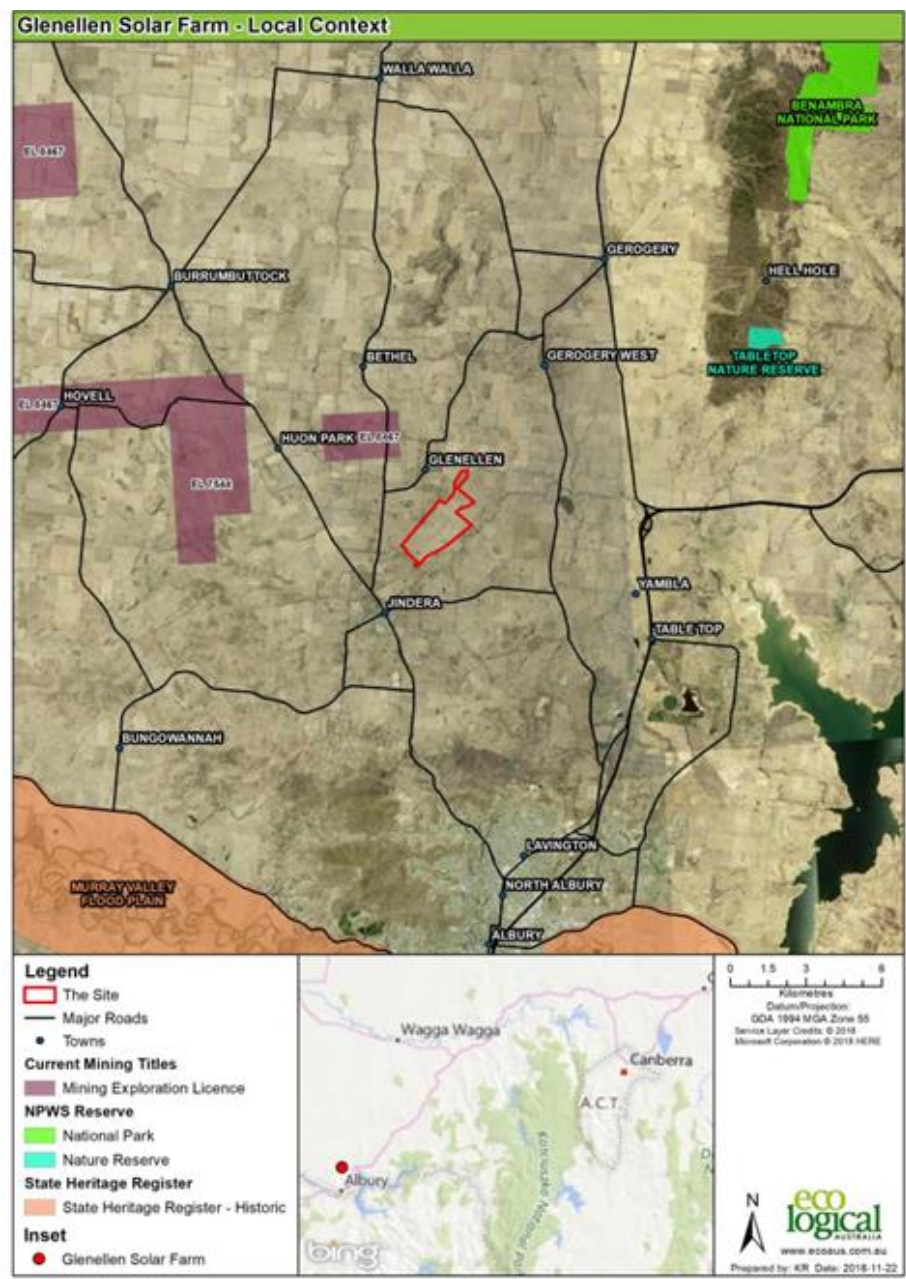
It is noted that Modification 2 of the SSD-9550 was determined on 29 April 2025 after the audit period and has not been assessed as part of this audit.

Condition C14 of Schedule 2 of SSD-9550 requires that an IEA must be undertaken in accordance with the IAPAR 2020. In accordance with IAPAR 2020, Ongoing construction audits need to be undertaken at an interval of no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.

This IEA was undertaken 26 weeks from the date of the previous Independent Audit. The Project was in the construction phase at the time of the audit. The focus of this IEA was to ensure compliance through this phase of the project.



Figure 1.1 Project Location



## 1.2 Audit Team

The audit was undertaken by the lead auditor Mr David Bone of EMM Consulting. NSW Department of Planning, Housing and Infrastructure (DPHI) Secretary's Endorsement letter from 10 March 2025 can be found in Appendix A.

## 1.3 Audit Objectives

The key objective of the IEA is to determine the project's compliance with SSD-9550 conditions relevant to the construction phase of the Project. The independent audit requirements under SSD-9550 are detailed in the following subsections. The IEA determined compliance with the requirements of the Project's approved supporting documentation including management plans, monitoring, and reporting requirements. The IEA has also assessed the overall effectiveness of environmental management at the Project through the site-based audit.

## 1.4 Audit Scope

This audit considers the projects compliance with conditions of consent SSD-9550, and any strategy, plan or program required under the consent. The documents to be audited will include but not be limited to those listed in Table 1.1 below.

**Table 1.1 Management plans and monitoring programs required by SSD 9550**

Condition	Requirement
<b>Schedule 2</b>	
A2	Environmental impact statement, including amending documents as listed in the definitions
A2	Final Layout Plans
A13	Consultation evidence
A14	VPA with council
B6	Road upgrade approved drawings
B9	Traffic management Plan
B12	Landscaping Plan
B17	Biodiversity offset credit retirements
B19	Biodiversity Management Plan
B27	Heritage Management Plan
B33	Emergency Plan
B36	Accommodation and Employment Strategy
C1	Environmental Management Strategy
C7-C13	DPHI notifications
C20	Website
<b>Additional Information</b>	
Environmental monitoring and management data supplied to meet the requirements of the above-mentioned plans	



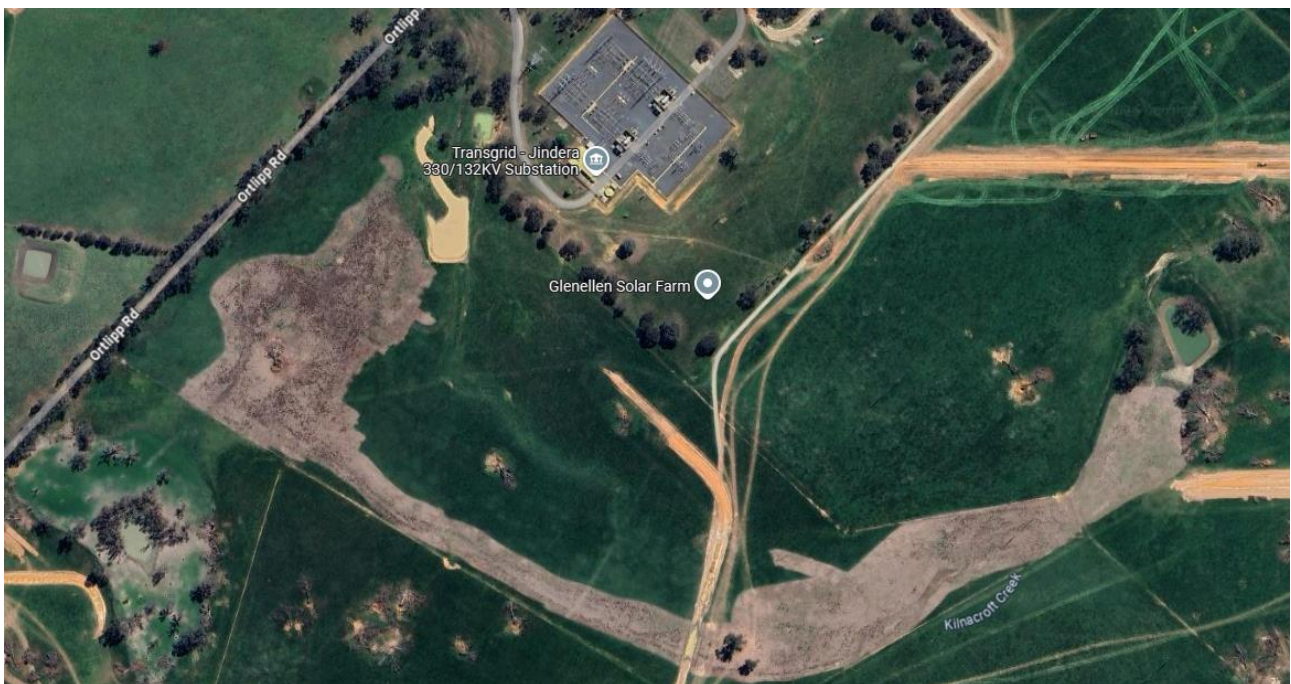
The audit evaluated the environmental performance of the project via assessment of:

- Actual impacts compared to predicted impacts documented.
- The physical extent of the project in comparison with the approved boundary.
- Incidents, non-compliances, and complaints that occurred or were made during the audit period.
- Through the consultation process determine if the project adequately addressed environmental concerns raised.
- Feedback received from the Department, other agencies, and stakeholders, including the community, on the environmental performance of the project during the audit period.

## 1.5 Audit Period

This IEA assessed the environmental performance and compliance status of the Glenellen Solar Farm during the construction phase between 23 October 2024 and 15 April 2025.

**Photograph 1.1** Glenellen Solar Farm construction status 09 April 2025 (Google Maps 2025)



## 2 Audit Methodology

The IEA process was undertaken in accordance with the requirements as set out by Section 3 of the IAPAR 2020, and following the AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems.

The audit scope was developed by the lead auditor, Mr. David Bone and included a review of the project approval and all documentation relevant to the construction of the Project. The scope and consultation requirements were supplied to DPHI for review on 03 April 2025 and the following scope and consultation requirements were provided:

Areas to be focused on include:

- Compliance with disturbance footprint, clearing limits and locations.
- Road maintenance and upgrades undertaken to the satisfaction of the roads authority (evidence of these being approved prior to construction commencing and heavy vehicle entering site).
- Evidence of vehicles using approved traffic route to and from site.
- Evidence of salvage and protection of aboriginal heritage items.
- Evidence of implementation, management and monitoring of erosion and sediment controls and preventing tracking of material off site.
- Evidence of VPA.
- Monitoring and recording of vehicle movements to and from site.
- Waste management on-site and offsite and compliance with conditions of consent and EPA requirements/ waste guidelines,
- Dust management, monitoring and measures taken to minimise dust on site, dust going off site and road dust.
- Compliance with working within approved hours.
- Evidence of Compliance with all commitments, monitoring and reporting requirement in all management plans.
- Complaints register evidence of the management, monitoring and responding to complaints.
- Complaints received by NSW Planning directly or indirectly relate to works out of hours mainly on a Sunday, dust, noise, notification to the community about works (not just the registered receivers), and waste management on-site and offsite.

Consultation with the following agencies:

- Local Aboriginal Land Councils
- Biodiversity Conservation Section (BCS)
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- Greater Hume Council

- NSW Environmental Protection Authority (NSW EPA)
- Heritage NSW
- Fire and Rescue NSW
- Rural Fire Service
- Transport for NSW (TfNSW)
- Water group within DCCEEW

Consultation Requests and responses can be found in Appendix B.

## 2.1 Compliance Evaluation

The evaluation of compliance of the project was undertaken through several different means, including a desktop review of publicly available documentation, approved plans and monitoring records and a site inspection including site interviews. The site inspection was undertaken to ensure that compliance with approved plans is being implemented on the ground and that additional evidence is available to ensure ongoing compliance. Site interviews were used to assess that site personnel recognize what their role in relation to the compliance requirements.

## 2.2 Site Interviews

Information was requested and reviewed prior to arriving on site; to ensure that auditor understood the key environmental elements of the Project before the site visit was undertaken.

Opening and closing meetings were conducted and interviews were also held on site as part of the audit and included the following staff:

- GPG HSE Manager – Daniel Cullen
- GPG HSE Assistant – Sofia Rojas
- GPG HSE Site supervisor – Garry Rister
- GPG Site Manager – Thomas Doake
- EPC Contractor supervisor – Monford Pty Ltd

Discussion points raised were:

- project overview and update
- monitoring results
- site layout, and
- complaints or incidents.

## 2.3 Site Inspections

On the 15 April 2025 a site inspection of the Project, was undertaken. At the time of the site inspection the following activities were noted:

- civil and mechanical works were underway across the site
- all main access and internal roads have been completed
- temporary site access off Ortlipp Road was in place
- clearing completed
- internal fencing was completed
- key components such as post heads, motor supports, drive systems, plastic bearings, torque tubes, springs, dampers, and stoppers were being installed
- over 103,000 PV modules had been installed,
- site office and laydown area has been setup
- trenching activities for cable connections had commenced.

The auditor was always escorted by site representatives.

Those involved in the site inspection comprised of:

- GPG HSE Manager – Daniel Cullen
- GPG HSE Assistant – Sofia Rojas
- GPG HSE Site supervisor – Garry Rister

Appendix C includes photographs that were taken during the site inspection.

## 2.4 Consultation

Consultation with external stakeholders was undertaken as part of the audit. Matters raised included:

### **NSW DCCEEW – Water**

- Preparation of management plans for water sources and dependent ecosystems
- Preparation and implementation of trigger action response plans
- Water supply availability is clearly defined
- Water take at the site is clearly documented
- Authorisation under the Water Management (General) Regulation 2018
- Water metering in accordance with the NSW Non-urban metering framework (where relevant)
- Water Access Licence(s) are used to account for water take and where water is being taken from
- Annual reporting

### **Biodiversity conservation services**

- Confirm that clearing activities are consistent with the approved BMP, and work along Lindner Road is limited to the Tree Location Plan.
- Audit considers whether the structure located approx. 400m south of the existing substation is constructed to reduce impacts on localised flooding at the site as per condition B30(c).

#### **NSW EPA**

- Ensure waste management practices are included as part of the Audit Scope

#### **Fire and Rescue NSW**

- No additional scope requirements

#### **Greater Hume Council**

- No additional scope requirements

#### **Heritage NSW**

- No additional scope requirements

#### **Transport for NSW**

- No additional scope requirements.

All correspondence on the audit scope development can be found in Appendix B.

## 2.5 Compliance Status Descriptors

The audit has been undertaken in consideration of the following compliance status descriptors, in accordance with the requirements as set out by Section 3 of IAPAR (NSW DPIE 2020).

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

In addition to the compliance status descriptors, the auditor may make such observations and notes, including identifying any opportunities for improvement, as they see fit in relation to any compliance requirement or any other aspect of the project.



## 3 Audit Findings

### 3.1 Approvals and documents audited

The following documents were reviewed to assess compliance against relevant project approval conditions under construction phase and effectiveness of environmental management measures implemented during the audit period:

- SSD-9550 Development Consent and the Conditions of Approval
- SSD 9550-PA-28-Auditor approval
- SSD 9550 Modification 1 (approved)
- Notification of Intent to Commence Construction (SSSD-9550-PA-7 23 August 2024)
- Construction Certificate – GDL240111
- Site Inductions
- VPA with Greater Hume Council
- Site management system data
- Traffic Management Plan (Version 8 13 August 2024 PDC Consultants)
- TMP staging approval (SSD-9550-PA-12 DPHI)
- Road Dilapidation report (V1 16 May 2024 Maker Engineering)
- Landscaping plans (Rev H 29 November 2024 Moir)
- Biodiversity Credit retirements (SSD 9550-PA17 )
- Biodiversity Management Plan V5 (Eco Logical)
- BMP approval (SSD 9550 PA-3)
- Clearing Permits
- Tree Clearing Report (Red-Gum Environmental Consulting Pty Ltd)
- Appointment of Heritage expert to prepare Heritage Management Plan (SSD-9550-PA-6)
- Arboricultural Impact Assessment (30/09/2024 High country Arborist Reports)
- Heritage Management Plan V08 (Past Traces)
- HMP approval and consultation on HMP
- Aboriginal Heritage – Salvage Compliance Report (v1 29/09/2024 Past Traces Heritage Consultants)
- Aboriginal Heritage – Unexpected Finds Culturally Modified Trees (v2 25/10/2024 Past Traces Heritage Consultants)

- Bushfire Management Plan Draft document
- Emergency Response Plan
- Waste dockets and reports
- Accommodation and Employment Strategy V4 (NGH)
- AES approval SSD9550 – PA 8
- Environmental Management Strategy V6 (Eco Logical)
- EMS approval SSD9550 PA-7
- Sediment and Erosion Control Plan (v2 27/09/2024 Ecological)
- Final layout plans September 2024, EOT SSD9550 PA 21
- Waste Management Plan (Rev 0 17/02/2025 Ecological)
- Construction Noise and Vibration Assessment and Management Plan (R01 28/02/2025 Marshall Day Acoustics)
- Project website <https://glenellensolarfarm.globalpower-generation.com.au/>

### 3.2 Compliance performance

Compliance performance was addressed against:

- SSD-9550 Conditions of Approval
- Approved Environmental Management Strategy and subplans
- From the 71 conditions listed, 57 conditions were triggered with the remainder not triggered as they relate to other stages of the project.

GPG personnel were able to answer the questions associated with the development approval and documentation and data to support compliance was ordered and easily accessible upon request. All conditions of approval have been given a compliance status as stated in Section 2.5 above.

During this audit period there were three non-compliances and, two recommendations made. These are detailed in Section 4.

### 3.3 Summary of agency notices, orders, penalty notices or prosecutions

There were no notices, orders, penalty notices or prosecutions related to the site during the audit period.

### 3.4 Previous audit recommendations

This is the second construction audit for the site, the first audit assessed the environmental performance and compliance status of the Glenellen Solar Farm during construction phase between 26 September 2024 and 22 October 2024. The site inspection for audit one was undertaken on 22 October 2024 and the audit identified two non-compliances in relation to signage and website information and two recommendations were made relating to

updates to the site induction and traffic management plan to make conditions clear to site staff. All of the NCR's and recommendations were closed out by the proponent during the previous audit period.

### 3.5 Environmental Management Strategy, management plans and compliance documents

The Environmental Management Strategy (EMS) and sub plans have been developed in accordance with the conditions of consent. Compliance documentation has been established in the site management system and shows correct implementation in accordance with the EMS and sub plans.

All plans are up to date for the stage of the development.

Details on the documents reviewed in relation to these documents is contained in Appendix D. The site inspection noted the following in relation to compliance with these plans:

- Some works were undertaken outside of the approved hours without approval. A complaint was raised in relation to these works on 23 March 2025. An NCR (**SSD 9550 NCR#2**) was raised against CoA B20 and B21
- Dust was observed from vehicles using internal access roads during the site inspection. Water carts were active at the time of the audit but were not able to suppress the dust due to dry conditions and vehicles exceeding the site 20km/hr speed limit. An NCR (**SSD 9550 NCR#3**) was raised in relation to CoA B23
- Waste materials comprising cardboard packaging, plastic wrapping and timber was observed to be stockpiled in very large amounts across several areas of the site. Some materials were observed in adjacent paddocks and complaints in relation to this were noted in the complaints register. Waste materials were also allegedly taken to an unlawful location. This matter is under investigation by NSW EPA. Waste dockets reviewed indicated that cardboard materials were collected by a contractor and a waste license could not be identified for this location by the auditor. An NCR (**SSD 9550 NCR#4**) was raised in relation to CoA B35

### 3.6 Environmental Performance

The plans required for the project were prepared and approved prior to the commencement of construction of the project. The project was in compliance with most conditions that have been triggered at this phase of the project at the time of the audit.

Site personnel that were present on site were aware of the environmental requirements under the conditions of consent and how they related to their role on the project. Signage and fencing clearly delineated heritage areas and restricted access to contractors undertaking clearing and other construction activities. Regular environmental inspection reports are filed in the management system.

#### 3.6.1 Site boundaries and clearing

The site inspection for the audit involved an inspection of all active works and the entire site perimeter. During this inspection it was noted that:

- The entire boundary of the site was clearly marked and securely fenced
- The disturbance footprint was clearly marked, and site staff were aware of the areas flagged off.

Clearing for the main site was complete and OSOM clearing along Lindner Road had not commenced at the time of the audit. Clearing for the road upgrades for Lindner and Ortlipp Roads and intersections was complete and within approved boundaries.

### 3.6.2 Erosion and sediment controls

The site is heavily grassed across the entire site, construction works in progress are controlled by existing dams on site. Riparian areas were noted to be protected by sediment fencing and final access across these waterways (in accordance with B30c) was still underway at the time of the inspection.

### 3.6.3 Voluntary Planning Agreement

The requirements of Condition A14 and Appendix 3 of the consent in relation to the development contributions to be paid to Greater Hume Council have been agreed (25/7/24). The agreement is in place with the first instalment due after the commencement of operation. This had not been triggered at the time of the audit.

### 3.6.4 Dust management

Dust levels were not noted as an issue during the site inspection. Water carts (2) were in operation on active internal roads at the time of the inspection. Speed limits of 20km/hr are in place for the site and several vehicles were noted to be well in excess of this speed and were causing significant dust plumes to be generated. Dust has not been a topic in the complaints listed for the site during the audit period. A Toolbox talk with the main contractor on 20/3/25 indicated that 20km per hr speed limit for site traffic to be enforced. The operation of water cart(s) on a more frequent basis has occurred since the audit site inspection and is noted to have made a significant reduction in dust levels across the site.

## 3.7 Consultation outcomes

The DPHI was advised of the scope of the audit, and requested consultation be undertaken with various agencies. The department's response and consultation with other agencies can be found in Appendix B. The requirements identified from consultation listed in Section 2.4 are discussed below.

### 3.7.1 Water

All required management plans have been approved for the project. No specific water management plan is required by SSD 9550.

Water in use for construction is currently sourced from a Greater Hume Council metered standpipe on the corner of Urana Road and Walla Walla Jindera Road. A water supply pipeline has been installed to extend an existing supply pipeline from the corner of Lindner Road along Ortlipp Road and into the site to provide construction water. Existing dams are being used to store water at the time of the audit.

Biodiversity management plan version 5 (Eco Logical Australia Pty Ltd) has a number of measures relating to flora and fauna management. None of these measures are directly related to GDE management, however riparian area measures are included and are being implemented.

## 3.8 Complaints

The Project website consists of a formal complaint form which provides both a phone number and an email to ensure that the public can make enquiries/complaints regarding the project. Table 3.1 highlights the complaint register found on the website.

**Table 3.1 Complaint Register**

Date of complaint	Complaint type	Complaint description	Response/Action	Status	Date of completion
18/04/2025	Environmental	Waste allegedly being taken offsite from Glenellen Solar Farm to an unauthorised location.	Under investigation	On going	N/A
08/04/2025	Out of hours work	Complaint relates to alleged activities occurring on site at Glenellen Solar Farm out of approved hours, in particularly on Sundays	Under investigation	On going	N/A
07/04/2025	Environmental	A photo was supplied with a small amount of waste that had allegedly blown onto the property. Complainant is concerned about contamination of crops about to be sowed.	Directions already issued to Contractor to keep site clean. GSF offered to clean up complainants paddock but they declined due to induction requirements for their farm	Closed	07/04/2025
14-19/03/2025	Traffic	Complainant was riding on Lindner Road, towards the Walla Walla Jindera Road. The truck met the complainant on the tarred section, right at the first bend closest to the Walla Walla Jindera Road. There is a large amount of loose gravel that has come off the tarred Road. The gravel has built up along the sides of the road, making it difficult to stop and get off the road when trucks come towards, or from behind, at speed. Also the 40 km per hour sign is situated after that first bend so technically, trucks cab travel up to 100kms until just before the 2nd corner, if you are coming from the Walla Walla Jindera Road. Thanks for talking with Greg Blackie	Investigate incident and report	Closed	21/03/2025
05/03/2025	Traffic	Caller advising of "Riverina Crane" trucks using the unapproved road from Glenellen Rd to Ortlipp Rd intersection	Investigate incident and report	Closed	5/3/25
30/01/2025	Noise/Dust	I have been away on and off for a month baling donated pasture in the southern highlands for the Grampian fire victims and returned last night at midnight. This morning someone was working on the solar site at 6.10am with the reversing alarm very loud in the still morning air, and at 7am a tipper and excavator came up our road in a cloud of dust and entered the north eastern side of the work site. The dust is appalling and you said before Christmas that it would improve in the new year, that obviously hasn't occurred. We have to live next door to this shitstorm for the next 20 odd years the least your company could do is play the game right in the meantime	After an investigation the following message was sent.. I forwarded your message to our contractor. There is another water cart on the way which should help with dust. They will absolutely make sure machinery will not start before 7am and The contractors confirmed that tipper and digger were not from our project and did not come onto the site.	Closed	31/01/2025

Date of complaint	Complaint type	Complaint description	Response/Action	Status	Date of completion
15/10/2024	Traffic	Residents have advised that today and yesterday trucks have been carting material to the Glenellen Solar Farm through non approved roads. They being Gerogery Road, Fielder Moll Road, Glenellen Road and Ortlipp Road	After an internal investigation the conclusion was the trucks were from a neighbouring project. The complainant was informed by email with photos of the trucks in question. Solar Farm vehicles keeping to approved roads was raised at kick off meeting 16/10/24	Closed	16/10/2024

The project team were aware of their requirement to document all complaints and record the actions taken to adequately address any issues that may arise.

### 3.9 Environmental incidents

No environmental incidents have been recorded at this stage of the project.

### 3.10 Actual versus predicted environmental impacts

The following key environmental management areas were noted from the approval:

- Water impacts
- Waste impacts
- Air quality impacts
- Noise impacts

The actual environmental impacts of the project were assessed against the predicted environmental impacts in the approval documents and found to be generally compliant.

Non-compliances were identified in relation to waste, air quality and noise during the audit period. These events were all isolated and were not identified as recurring or likely to cause any environmental impacts. The quick response from the GPG team to address the issues when raised has reduced any potential impact further.

### 3.11 Site interviews

All site personnel were aware of their environmental requirements for their role. Personnel interviewed during the audit are detailed in Section 2.3.

### 3.12 Site inspection

The site was under full construction at the time of the site inspection. Construction facilities had been constructed and all-weather site access roads and road upgrades had been completed and were well maintained at the time of the inspection.





**Photograph 3.1**      **Example of the stage of construction at the time of the audit**



**Photograph 3.2**      **Trenching works for cabling installation commencement**

Entry and exit points were established and signage was installed to ensure the correct flow of traffic. A large portion of the above ground permanent structures had been erected at the time of the site inspection.





**Photograph 3.3** Construction stage active at the time of the audit

No visual tracking of dirt onto public roads was observed and sediment controls had been installed where required.

Environmental compliance monitoring measures were being implemented on the site as required. Waste management was noted as an issue with large un-consolidated waste stockpiles noted in several site areas.



**Photograph 3.4** Waste materials storage under powerline easement



**Photograph 3.5**      **Waste material storage at the main laydown area**

It was noted that materials were not appropriately stored or segregated awaiting pick up.

Heritage protection measures were in place as required and biodiversity surveys had been completed. Clearing was complete at the time of the inspection.



**Photograph 3.6**      **Permanent fencing installed around CMT**

Water sources are established and discussions and inspections occur with Emergency response providers to ensure adequate access and capacity was in place for firefighting. Consultation with RFS had been undertaken to ensure access to the various dams on the site is available, the auditor was advised that further meetings were planned with RFS and Fire and Rescue teams from the local area.

Vegetative screening of the project had not commenced at the time of the inspection. This is timed to commence in Spring 2025. Weed management was well managed with a local weeds specialist engaged to manage pasture weeds and control methods to suit the local weather and growing conditions.

### 3.13 Previous Annual Review or Compliance report recommendations

The Project is currently under construction and has been since September 2024. Thus, no operational annual reviews, or compliance reporting recommendations have been made.

### 3.14 Key strengths

The online management system used ensured that the site records were readily available upon request. The project team was well organised and were aware of their environmental requirements for their role.

The project team has a very good understanding of the requirements and ensured that the site was well prepared and managed.



## 4 Non-conformance and Recommendations

### 4.1 Non-compliances

The following non compliances were identified for this audit period:

SSD9550 NCR#2 – CoA B20, B21 – Works undertaken outside of hrs with no approval. Complaint received on 23 March 2025. Noise from work on Sundays noted via complaints (23 March 2025). EPC not approved to undertake piling works. Noise Mgt Plan issued to TransGrid and Monford on 3 March 2025.

**Obtain approval as per B21 for all works required outside of approved hours.**

SSD9550 NCR#3 – CoA B23 – The site was observed to be very dusty due to dry conditions, water carts (2) were noted to be in operation however a large amount of haul road was in use across the site with minimal to no water in many areas in use at the time of the inspection. Dust noted to be largely confined to site, wind was low to calm at the time of the inspection. Toolbox talk on 20/3/25 indicated that 20km per hr speed limit for site traffic to be enforced. Excessive speed estimated to be well above 20km/hr noted to be a key contributor to dust at the time of the audit.

**Maintain dust suppression practices and control speed on roads to maintain dust levels in accordance with approval conditions**

SSD9550 NCR#4 – CoA B35 Issue relating to waste from site on adjacent property raised in compliant register. Wastes (plastic wrapping) noted to be present in adjacent farmland due to large amount of wastes stockpiled on the site and windy conditions preceding audit.

Complaint also raised in relation to waste disposal offsite to an unauthorised location. NSW EPA advise they are investigating this issue. Monthly report , waste disposal dockets for month of March 2025.

**Waste on site to be managed to prevent windblown materials leaving site and all wastes to be disposed of to lawful locations.**

### 4.2 Recommendations

The following recommendations were identified during the audit.

SSD 9550 REC#1 - The revised HMP is shown as V2 from 13/3/25. As this is an update from the approved V8 document from 15/7/24 the revision number should be updated for continuity. Once finalised the document must be resubmitted to DPHI for approval and once approved must be implemented.

**Update revision number for continuity with previously approved document.**

SSD 9550 REC#2 - Website includes links for information as required, the current 'Newsletters' link connects to the complaints form and should be updated.

**Update and review links to ensure information is up to date and links to correct attachments**

## 5 Conclusion

EMM Consulting Pty Limited (EMM) was engaged by GPG to conduct an independent environmental audit (IEA) of the Glenellen Solar Farm (the Project). This IEA was completed to fulfil the requirements of the Development Consent SSD-9550 as modified issued 23 August 2024.

Condition C14 requires that an IEA be undertaken in accordance with the *Independent Audit Post Approval requirements* (DPE 2020), audit intervals for operational projects must be no greater than 12 weeks from the commencement of construction and then at 26 weeks intervals from the date of the initial Independent Audit or as otherwise agreed by the Secretary.

The objective of this audit was to assess compliance over the audit period 23 October 2024 to 15 April 2025.

The Project has commenced construction and has completed all required road upgrades.

Consultation was undertaken with several agencies for this audit by the auditor as noted in Section 2.4.

Non-conformances were identified with dust, waste and noise management as described in Section 4.1. These issues were all isolated occurrences and were rectified by the GPG management team either during the site inspection or within the audit report period. No environmental harm was noted as a result of the non-conformances. Waste disposal matters are being investigated by DPHI and NSW EPA.

Recommendations related to minor administrative errors on plans and website links, these were made to enhance the clarity of approval requirements.

The site was well maintained, site access roads were well maintained and clearly delineated, entry and exit points were in place and well maintained. No visual tracking of dirt on public roads was observed, exclusion fencing for heritage and biodiversity areas were in place and sediment controls were noted around the site.

Site personnel were organised and were able to provide compliance evidence upon request. The project team had a good understanding of their environmental requirements and the implementation on site.

The project was found to be generally compliant with conditions for this phase of the project. To ensure compliance with requirements of the consent, the next audit will be required by late October 2025 unless otherwise agreed with DPHI.

The auditor would like to thank GPG and Monford contractors for co-ordinating unfettered access to the site and for provision of all information upon request to finalise this audit.



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# Appendix A

NSW Department of Planning, Housing and Infrastructure  
Secretary's Endorsement

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NSW Planning ref: SSD-9550-PA-28

Mr Juan Carlos Cobo Ledezma  
Project Director  
The Trustee for Glenellen Asset Trust  
Suite A, Level 3, 73 Northbourne Avenue  
CANBERRA, ACT 2601  
10/03/2025

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Sent via the Major Projects Portal only

**Subject: Glenellen Solar – Independent Environmental Auditor Approval 2025**

Dear Mr Cobo Ledezma

I refer to your letter dated 6 March 2025, seeking the agreement of the Planning Secretary of the Department of Planning, Housing and Infrastructure ("NSW Planning") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of the Glenellen Solar Farm ("the development"), in accordance with Part C, Condition C14 of development consent SSD 9550, as modified ("the consent").

Having considered the qualifications and experience of Mr David Bone of EMM Consulting Pty Limited, as nominee of the Planning Secretary, I endorse the appointment of Mr Bone, in accordance with Condition C14 of the consent. This approval is conditional on Mr Bone being independent of the development and maintaining Exemplar Global certification. NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the conditions of approval and the Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditor may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on 4247 1852 or by email to [Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@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

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# Appendix B

## Consultation Register

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## B.1 Consultation Register

**Table B.1 Agency and stakeholder consultation records**

Agency/Stakeholder	Date Sent	Date responded	Comments
DPHI	03/04/2025	06/04/2025	<ul style="list-style-type: none"> <li>• NSW Planning requests the below agencies are consulted: <ul style="list-style-type: none"> <li>– Local Aboriginal Land Councils</li> <li>– Biodiversity Conservation Section (BCS)</li> <li>– DCCEEW NSW Department of Climate Change, Energy, the Environment and Water</li> <li>– Greater Hume Council</li> <li>– EPA</li> <li>– Heritage NSW</li> <li>– Fire and Rescue NSW</li> <li>– Rural Fire Service</li> <li>– TfNSW</li> <li>– Water group within DCCEEW</li> </ul> </li> <li>• Areas to be focused on include: <ul style="list-style-type: none"> <li>– Compliance with disturbance footprint, clearing limits and locations.</li> <li>– Road maintenance and upgrades undertaken to the satisfaction of the roads authority (evidence of these being approved prior to construction commencing and heavy vehicle entering site).</li> <li>– Evidence of vehicles using approved traffic route to and from site.</li> <li>– Evidence of salvage and protection of aboriginal heritage items.</li> <li>– Evidence of implementation, management and monitoring of erosion and sediment controls and preventing tracking of material off site.</li> <li>– Evidence of VPA.</li> <li>– Monitoring and recording of vehicle movements to and from site.</li> <li>– Waste management on site and offsite and compliance with conditions of consent and EPA requirements/ waste guidelines,</li> <li>– Dust management, monitoring and measures taken to minimise dust on site, dust going off site and road dust.</li> <li>– Compliance with working within approved hours.</li> <li>– Evidence of Compliance with all commitments, monitoring and reporting requirement in all management plans.</li> <li>– Complaints register evidence of the management, monitoring and responding to complaints.</li> </ul> </li> <li>• Complaints received by NSW Planning directly or indirectly relate to works out of hours mainly on a Sunday, dust, noise, notification to the community about works ( not just the registered receivers), and waste management on site and offsite. concerns about where the waste from site is going?</li> </ul>

Agency/Stakeholder	Date Sent	Date responded	Comments
BCS	17/04/2025	24/04/2025	<p>We highlight version 5 of the BMP dated 19 August 2024 which was approved by DPHI on 22 August 2024. We request that the audit confirms that clearing activities are consistent with the maps in Chapter 2 of the approved BMP, being Figures 2.1 to 2.9 inclusive. In particular, the work along Lindner Road must be limited to the Tree Location Plan at Figure 2.9 and the report that is the basis for that map (ArborViews 2023).</p> <p>We also request that the audit consider whether the structure identified in the image below (located approx. 400m south of the existing substation) is constructed to reduce impacts on localised flooding at the site as per condition B30(c).</p>
Fire and Rescue	17/04/2025		No additional scope identified
NSW EPA	17/04/2025		<p>The EPA has recently notified the Department of Planning, Housing and Infrastructure (DPHI) about a report they received on 25 March 2025 in relation to the alleged mismanagement of waste from the project in breach of SSD-9550. Therefore recommend that EMM ensure waste management practices are included as part of the Audit Scope.</p> <p>In view of these factors, the EPA has no further comments to provide in relation to this matter and no follow-up consultation is required.</p>
NSW DCCEEW Water	17/04/2025	22/04/2025	<p>NSW DCCEEW Water group requested that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the audit scope:</p> <ul style="list-style-type: none"> <li>• 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. The plans may include: <ul style="list-style-type: none"> <li>- Water Management Plans and related subplans</li> <li>- Extraction plan and related sub-plans</li> </ul> </li> <li>• 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</li> <li>• Water supply availability is clearly defined for the project</li> <li>• 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.</li> <li>• Water metering at the site is in accordance with NSW non-urban metering framework where relevant</li> <li>• Water Access licences used to account for water by the project nominates the work where the water is being taken from</li> <li>• Annual reporting clear documents: <ol style="list-style-type: none"> <li>1. Water take use and water source impacts</li> <li>2. Compares results with previous years</li> <li>3. Identifies exceedances and these are managed/mitigated.</li> </ol> </li> </ul>
Greater Hume Council	17/04/2025		No response received
Heritage NSW	17/04/2025	-	No response received

Agency/Stakeholder	Date Sent	Date responded	Comments
Heritage Consultants	17/04/2025	-	No response received
TFNSW	17/04/2025	-	No response received



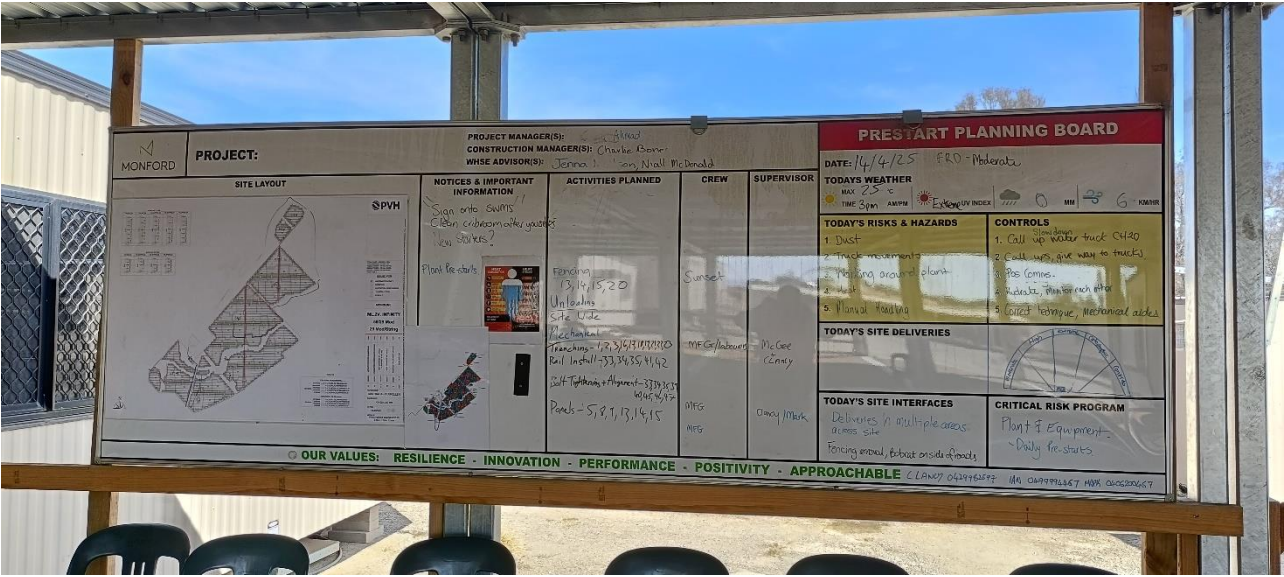
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# Appendix C

## Site Photographs

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C.1 Site Photographs



Photograph C.1 Site Notice Board



Photograph C.2 Arrays ready for panel installation





**Photograph C.3**      **Waste material storage – materials not separated and numerous sites of this nature across site at the time of the audit.**

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# Appendix D

## Independent Audit Compliance Table

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SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
SCHEDULE 1 Development Consent					
1.1 SSD 9550 Glenellen Solar Farm					
SCHEDULE 2 Part A ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1	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.	Triggered	Completion of this compliance table	Completion of this compliance table	Compliant
TERMS OF CONSENT					
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in APPENDIX 1.	Triggered	Mod 1 approved for 6 mth wait on B9 and B36 conditions Mod 2 submitted for new permanent road to sub station prior to audit 16/10/24. Not approved at time of audit.	The development was being carried out in accordance with these conditions at the time of the audit.	Compliant
A3	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents.	Triggered	Noted	No directions received at the time of the audit	Compliant
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Triggered	Noted	No inconsistencies noted at the time of the audit.	Compliant
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE					
A5	The Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved Development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development (including, but not limited to, the method of disposal for redundant solar panels) to the Planning Secretary incorporating the proposed upgrades.	Not Triggered		No upgrades undertaken, no panels installed at the time of the audit.	Not Triggered
SRUTCTURAL ADEQUACY					
A6	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 National Construction Code. Notes: • 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.	Triggered	Construction Certificate - GDL240111	Construction certificate determined on 17/12/2024 by NSW Fair Trading	Compliant
DEMOLITION					
A7	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Not Triggered		No demolition required at the time of the audit. Fencing has been removed across the site.	Not Triggered
PROTECTION OF PUBLIC INFRASTRUCTURE					
A8	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.  Note: 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.	Triggered	Not required to date	No damage to public infrastructure identified at the time of the audit	Compliant
OPERATION OF PLANT AND EQUIPMENT					

SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
A9	All plant and equipment used on site, or in connection with the development, must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Triggered	Records of plant hours and service tracking provided - Fleet Office Example Screen Shot - Glen EOM Hrs_April 2025 (Plant hours and service tracking) -Plant Pre-Mob Example (Service history, Weed & seed)	Plant and equipment used on site comply with these requirements at the time of the audit	Compliant
SUBDIVISION					
A10	The Applicant may subdivide land comprising the site for the purposes of carrying out the development as identified in APPENDIX 4 and in accordance with the requirements of the EP&A Act, EP&A Regulation and the Conveyancing Act 1919 (NSW).	Triggered	Not required to date	No sub-division outside of approved areas required at the time of the audit	Compliant
APPLICABILITY OF GUIDELINES					
A11	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Triggered	Noted	Noted and current guidelines in use at the time of the audit. Guidelines, policies and legislation monitored by corporate systems.	Compliant
COMPLIANCE					
A12	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Triggered	Site Induction viewed	Induction process in place	Compliant
EVIDENCE OF CONSULTATION					
A13	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Triggered	See approved documents	Plans approved and contain consultation evidence	Compliant
COMMUNITY ENHANCEMENT					
A14	Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the letter of offer dated 26 March 2021, which are summarised in APPENDIX 3.	Not Triggered	VPA agreed 25/7/24 with Greater Hume Council	Agreement in place as required	Not Triggered
PART B - ENVIRONMENTAL CONDITIONS – GENERAL					
TRANSPORT					
Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions					
B1	The Applicant must ensure that the: (a) development does not generate more than: (i) 45 heavy vehicle movements a day during construction, upgrading and decommissioning; and (ii) 11 movements of heavy vehicles requiring escort during construction, upgrading and decommissioning; and (b) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise.	Triggered	Daily site reports contain information on truck numbers, trucks have GPS fitted to allow tracking of routes. No escort vehicles required to date.	Vehicle movements comply with these requirements at the time of the audit.	Compliant
B2	The Applicant must keep accurate records of the number of heavy vehicles and vehicles requiring escort entering or leaving the site each day for the duration of the project.	Triggered	Daily site reports contain information on truck numbers Monthly progress Report MFG	Vehicle numbers tracked by onsite systems and found to be compliant for the audit period reviewed.	Compliant
Access Route					



SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
B3	Unless otherwise agreed by the Planning Secretary, all heavy vehicles associated with the development (including heavy vehicles requiring escort) must travel to and from the site: (a) via Hume Highway, Thurgoona Drive, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road and the approved Main Access Point off Ortlipp Road, as identified in Figure 4; and / or (b) from the Ettamogah Rail Hub via Hub Road, Gerogery Road, Wagga Road, Catherine Crescent, Union Road, Urana Road, Walla Walla Jindera Road, Lindner Road, and Ortlipp Road, as identified in Figure 5.	Triggered	Induction slides	Induction contains this information. Code of conduct and access routes provided to delivery drivers	Compliant
B4	All heavy vehicles and heavy vehicles requiring escort associated with the development: (a) Are prohibited from using Glenellen Road and Drumwood Road; and (b) are prohibited from moving through, and parking in, the township of Jindera (along Urana Road between Pioneer Drive and Walla Walla Jindera Road) during school zone times of 8am to 9.30am and 2.30pm to 4pm.	Not Triggered		No deliveries of this type during the audit period.	Not Triggered
Site Access					
B5	All vehicles associated with the development must enter and exit the site via the Main Access Point off Ortlipp Road, as identified in APPENDIX 1.	Triggered	Site Inspection Induction slides Traffic Management Plan Photos provided	Signage installed at the time of the audit. Access road to site installed and intersection upgrades completed as required. Design refinement in progress to finalise pavement and connection to Ortlipp Road entrance. All vehicles noted to enter and exit via the main access point at the time of the audit.	Compliant
Road Upgrades					
B6	Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in APPENDIX 5. Unless the relevant road authority agrees otherwise, these upgrades must comply with the current Austroads Guidelines, Australian Standards and TfNSW supplements, and be carried out to the satisfaction of the relevant roads authority.	Not Triggered	Site Inspection Correspondence with council	Road upgrades complete and in use.	Not Triggered
Road Maintenance					
B7	The Applicant must, in consultation with the relevant roads authority: (a) undertake an independent dilapidation survey to assess the: (i) existing condition of Ortlipp Road and Linder Road on the transport route, prior to construction, upgrading or decommissioning works; and (ii) condition of Ortlipp Road and Linder Road on the transport route, following construction, upgrading or decommissioning works; and (b) repair of roads identified in condition B7(a) if dilapidation surveys identify that the road has been damaged due to development-related traffic during construction, upgrading or decommissioning works. If there is a dispute between the Applicant and the relevant roads authority about road repairs required under this condition, then either party may refer the matter to the Planning Secretary for resolution.	Triggered	Dilapidation report 16/5/24 Maker Eng MKRV0065 V1 May 2024	Report prepared and lodged as required	Compliant
Operating Conditions					
B8	The Applicant must ensure: (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 a clean condition to minimise dirt being tracked onto the public road network.	Triggered	Site Inspection Photos	Completed roads are all weather	Compliant
Traffic Management Plan					



SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
B9	<p>Prior to commencing road upgrades identified in condition B6, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> <li>(a) details of the transport route to be used for all development-related traffic;</li> <li>(b) details of the road upgrade works required by condition B6;</li> <li>(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"> <li>(i) details of the dilapidation surveys required by condition B7;</li> <li>(ii) temporary traffic controls, including detours and signage;</li> <li>(iii) scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable;</li> <li>(iv) notifying the local community about development-related traffic impacts;</li> <li>(v) procedures for receiving and addressing complaints from the community about development-related traffic;</li> <li>(vi) ensuring construction traffic complies with a 40 km/h speed limit along Ortlipp and Lindner Roads;</li> <li>(vii) minimising potential cumulative traffic impacts with other projects in the area;</li> <li>(viii) minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network, and avoiding the transport of material along the local bus routes when school buses are in operation, in consultation with local schools;</li> </ul> </li> </ul>	Triggered	<p>TMP V08 13/8/24 PDC Consultants 0888r01v08 13/8/24</p> <p>TMP V09 20/1/25</p> <p>DPHI approval 21/8/24</p> <p>TMP staging approved 16/6/24</p> <p>Site photos Traffic Management Inspections F65274.20 Weekly Environmental Checklist F69113.6 Weekly Environmental Checklist F66946.47</p>	<p>Alternative route for OSOM operating buildings is supported by Council. Modification required and to be lodged for this route change. Modification not approved at the time of the audit. No OSOM deliveries undertaken during audit period.</p> <p>NCR#1 items closed from previous audit.</p>	Compliant
	<ul style="list-style-type: none"> <li>(ix) details of how heavy vehicles and heavy vehicles requiring escort associated with the development will avoid moving through, and parking in, the township of Jindera during school zone times, as required by condition B4(b);</li> <li>(x) measures to minimise dirt tracked onto the public road network from development-related traffic;</li> <li>(xi) details of any employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;</li> <li>(xii) encouraging car-pooling or ride sharing by employees;</li> <li>(xiii) scheduling of haulage vehicle movements to minimise convoy length or platoons;</li> <li>(xiv) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;</li> <li>(xv) responding to any emergency repair or maintenance requirements; and</li> <li>(xvi) a traffic management system for managing heavy vehicles requiring escort;</li> </ul> <p>(d) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> <li>(i) driver fatigue;</li> <li>(ii) procedures to ensure that drivers adhere to the designated transport routes and speed limits; and</li> <li>(iii) procedures to ensure that drivers implement safe driving practices; and</li> </ul> <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>			<p>The TMP was being implemented on site at the time of the audit.</p> <p>Albury pick up point identified for later stages. Not required or in use at time of audit.</p> <p>V10 document under review at the time of the audit</p>	Compliant
<b>LANDSCAPING</b>					
<b>Vegetation Buffer</b>					
B10	<p>The Applicant must establish and maintain a vegetation buffer (landscape screening) as described in the EIS and at the locations identified in APPENDIX 6. The landscape screening must:</p> <ul style="list-style-type: none"> <li>(a) be planted prior to commencing operation;</li> <li>(b) be comprised of species that are endemic to the area;</li> <li>(c) be designed and maintained in accordance with RFS's Planning for Bushfire Protection 2019 (or equivalent); and</li> <li>(d) be properly and actively maintained with appropriate weed management and replacement of failed plantings unless the Planning Secretary agrees otherwise.</li> </ul>	Triggered	<p>Design drawings Correspondence on planting</p>	<p>Planned to commence in May 2025 as the optimal planting period identified by the project agronomist. Quotations approved and awaiting commencement with spraying, mulching and then planting.</p>	Compliant

SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
B11	The Applicant must take all reasonable steps to provide additional vegetation screening or scattered trees at residences (receivers LIN001, 004, 005, 007, DRM008, NIK003 and MLA01), in consultation with the landowners, to ensure that views of the development are screened.	Triggered	Design drawings Correspondence on planting	Planned to commence in May 2025 as the optimal planting period identified by the project agronomist. Quotations approved and awaiting commencement with spraying, mulching and then planting.	Compliant
Landscape plan					
B12	Prior to the issue of any construction certificate, the Applicant must prepare a detailed Landscape Plan. This plan must: (a) be prepared to a minimum scale of 1:1000; (b) describe measures including: (i) width of planting; (ii) density of plantings; (iii) timing of planting, considering appropriate seasonal windows to maximise success; and (iv) maintenance and monitoring requirements, including monthly monitoring for the first 12 months and replacement of mortalities for the first 5 years; and (b) provide details of the landscape screening required by condition B10 and B11, including: (i) how the Applicant will provide targeted landscape screening on the Site and at residences in consultation with adjacent landowners; and (ii) demonstrating that the landscape screening is of a width and depth sufficient to screen the views of the development from adjacent properties and roads; and (c) provide details of how any hollow-bearing trees proposed to be removed may be reasonably and feasibly reincorporated on the Site. The Applicant must implement the Landscape Plan.	Triggered	Correspondence Landscape Plan (Rev H, 29/11/2024) Construction Certificate - GDL240111	Plan prepared and approved as part of other conditions. CC approved and landscape plan included in this CC. Certifier has provided a checklist of items required.	Compliant
LAND MANAGEMENT					
B13	The Applicant must maintain the agricultural land capability of the site, including: (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; and (c) maintaining grazing within the Development Footprint, where practicable, unless the Planning Secretary agrees otherwise.	Triggered	Correspondence Reports from site inspections	Agronomist engaged and grazing management plan in preparation. No construction completed to date.	Compliant
B14	The Applicant must maintain the site fencing to ensure the fencing remains stock proof.	Triggered	Site Inspection	Fencing in place as required	Compliant
BIODIVERSITY					
Vegetation Clearance					
B15	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	Triggered	Site Inspection	All clearing within approved footprints at the time of the audit	Compliant
B16	The Applicant must make all reasonable efforts to replace the removed paddock trees with the same number of trees of a similar species on the site. These replacement trees are to be planted within the area of the site identified for riparian planting and/or within the vegetation buffer.	Triggered	Landscape Plan	Planting requirements contained in landscape mgt plan. No planting complete at the time of the audit.	Compliant
Biodiversity Offsets					
B17	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	Not Triggered	PA 17 15/8/24, credit retirement from DPHI sighted.	Credits retired as required.	Not Triggered
B18	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired.	Not Triggered	PA 17 15/8/24, credit retirement from DPHI sighted.	Evidence provided to DPHI as required	Not Triggered

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Biodiversity Management Plan					
B19	<p>Prior to carrying out any development that could directly or indirectly impact biodiversity values, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in accordance with the Biodiversity Development Assessment Report dated 7 August 2023, including incorporation of the measures described in the Roadside Tree Assessment (ArborViews, 2023);</p> <p>(b) include a description of the measures and timeframes that would be implemented for:</p> <p>(i) protecting vegetation and fauna habitat outside the approved disturbance areas;</p> <p>(ii) managing and enhancing the remnant vegetation and fauna habitat on site;</p> <p>(iii) avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna;</p> <p>(iv) minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development;</p> <p>(v) minimising the impacts to fauna on site and implementing fauna management protocols;</p> <p>(vi) rehabilitating and revegetating temporary disturbance areas with native species that are appropriate to the site's ecology and conditions;</p> <p>(vii) maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and</p> <p>(viii) controlling weeds, feral pests and pathogens;</p>	Triggered	<p>BMP Approved PA 3 22/8/24</p> <p>Ecological Australia V5 19/8/24</p> <p>TreeClearingReport_GlenellenSolarFarm_1210 24 (002)_Monford_Dated 12/10/24 (1)</p> <p>-SITE LAYOUT CLEARING Progress measure markup 27092024</p> <p>-Supplementary watering of roadside trees</p> <p>-Environmental Weekly Inspection template_MFG</p> <p>-No go Zone_CH pictures attached</p> <p>-Toolbox No Go Zone Riparian Zone and waste_MFG</p> <p>-Clearing Permit F1.524762</p> <p>-Clearing Permit F65877.13</p> <p>Fauna Management Register</p> <p>-Weekly Environmental Checklist F69113.6</p> <p>-Weekly Environmental Checklist F66946.47</p> <p>Plant Pre-Mob Example (Service history, Weed &amp; seed)</p>	<p>Plan approved as required.</p> <p>Works undertaken up to the time of the audit have been in accordance with this plan and requirements of this condition.</p>	Compliant
	<p>(c) include a program to monitor and report on the effectiveness of mitigation measures;</p> <p>(d) include an incidental threatened species finds protocol to identify the avoid and/or minimise and/or offset options to be implemented if additional threatened species are discovered on site; and</p> <p>(e) include details of who would be responsible for monitoring, reviewing and implementing the plan.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p>	Triggered	<p>Pre-clearing reports</p> <p>Post clearing report for areas cleared to date contains all information required in mgt plan</p>	<p>Monitoring of clearing undertaken provided in accordance with the requirements of the approved plan.</p>	Compliant
AMENITY					
Construction, Upgrading and Decommissioning Hours					
B20	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <p>the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and emergency work to avoid the loss of life, property and/or material harm to the environment.</p>	Triggered	<p>Site notice board</p> <p>Induction</p> <p>Site mgt system</p>	<p>Site induction covers these requirements.</p> <p>Works undertaken outside of hrs with no approval and complaint received in relation to these works on 23 March 2025. The type of works undertaken were identified as 'piling work' . These activities would have required approval under COA B20 which was not in place at the time of the work being undertaken.</p> <p>Noise from work on Sundays noted via complaints (23 March 2025). EPC not approved to undertake Solar array piling works during this time.</p> <p><b>SSD 9550 NCR#2 - Obtain approval as per B21 for all works required outside of approved hours.</b></p>	Non-compliant
Variation of Construction Hours					

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B21	The hours of construction activities specified in condition B20 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Council (and other relevant agencies) has been or will be undertaken; (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.	Triggered	No OOHW variation approved at the date of the audit	Works undertaken outside of hrs with no approval. The works undertaken were not considered to be approved under B20. Complaint received see B20.  <b>SSD 9550 NCR#2 - Obtain approval as per B21 for all works required outside of approved hours.</b>	Non-compliant
Noise					
B22	The Applicant must: (a) minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) or its latest version; and (b) ensure that the noise generated by the operation of the development during the night does not exceed 35 dB(A) LAeq, 15min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.	Triggered	Site under construction at the time of the audit.	Noise Mgt Plan for operations is in preparation and to be reviewed. Issued noise mgt plan internal doc to TransGrid and Monford on 3 March 2025.	Compliant
Dust					
B23	The Applicant must ensure all activities occurring at the Site are carried out in a manner that minimises dust including the emission of wind-blown or traffic generated dust.	Triggered	Site Inspection Photos -Water meter reading. -Glen EOM hrs_April 2025 (Plant hours and service tracking) -Monthly Construction Water Usage -GSF Construction Water Register	Site very dusty due to dry conditions, water carts (2) in operation however a large amount of haul roads in use across the site with minimal to no water in use at the time of the inspection. Dust noted to be largely confined to site, wind was low to calm at the time of the inspection. Toolbox on 20 /3/25 indicated 20km per hr for site traffic, excessive speed noted to be a key contributor to dust.  <b>SSD 9550 NCR#3 - Maintain dust suppression practices and control speed on roads to maintain dust levels in accordance with approval conditions.</b>	Non-compliant
Visual					
B24	The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Triggered	Site Inspection	No ancillary structures built at the time of the audit, panel installation well advanced at the time of the audit. No advertising sign age was erected at the time of the audit. No complaints in relation to off-site visual impacts at the time of the audit.	Compliant
Lighting					
B25	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: (i) is installed as low intensity lighting (except where required for safety or emergency purposes); (ii) does not shine above the horizontal; and (iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or the latest version.	Triggered	Site Inspection	No lighting installed for the development at the time of the audit. Temporary security lighting in place on site sheds	Compliant

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HERITAGE					
Protection of Heritage Items					
B26	The Applicant must ensure the development does not cause any direct or indirect impacts on heritage items located outside the approved Development footprint.	Triggered	Site Inspection	No works outside footprint to date	Compliant
Heritage Management Plan					
B27	<p>Prior to carrying out any construction, the Applicant must prepare a Heritage Management Plan for the development and submit it to the Planning Secretary for approval. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be prepared in consultation with Heritage NSW and Registered Aboriginal Parties;</p> <p>(c) include a description of the measures that would be implemented for:</p> <p>(i) protecting the heritage items located outside the approved Development footprint;</p> <p>(ii) salvaging and relocating the heritage items located within the approved Development footprint, as identified in Table 1 of APPENDIX 7;</p> <p>(iii) a contingency plan and reporting procedure if:</p> <ul style="list-style-type: none"><li>• previously unidentified heritage items are found; or</li><li>• Aboriginal skeletal material is discovered;</li></ul> <p>(iv) 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</p> <p>(v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</p> <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	Triggered	<p>HMP - Past Traces v08 15/7/24</p> <p>DPHI approval 6/8/24.</p> <p>Consultation with NSW Heritage, Past Traces and RAP's</p> <p>Draft HMP V2 13/3/25</p> <p>Arborists report _Scar trees</p> <p>Salvage done (Archaeologist and aboriginal groups)- Past Traces. Report Received by Past Traces</p> <p>CH site induction done</p> <p>Unexpected finds report done</p> <p>Scar tree protection fencing</p> <p>Appointment of Experts</p>	<p>Plan approved as required and being implemented on site.</p> <p>Additional items identified, plan update has been undertaken as a result of this and is in draft form at the time of the audit. Aboriginal stakeholders have been consulted and are heavily involved in the mitigation measures for the additional items identified as well as landscaping of riparian and screening vegetation.</p> <p>No issues were raised during consultation with the Archaeologist or stakeholders.</p> <p>The revised HMP is shown as V2 from 13/3/25. As this is an update from the approved V8 document from 15/7/24 the revision number should be updated for continuity. Once finalised the document must be resubmitted to DPHI for approval and once approved must be implemented.</p> <p><b>SSD9550 REC#1 - Update revision number for continuity with previously approved document prior to submission to DPHI for approval.</b></p>	Compliant
SOIL & WATER					
Water Supply					
B28	The Applicant must ensure that it has sufficient water for all stages of the development, including volumes required for dust suppression and the maintenance of landscape screening for the life of the development.	Triggered	Site Inspection Water usage records	Pipeline for incoming water in place for construction.	Compliant
Water Pollution					
B29	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Triggered	-Water monitoring testing ongoing -Compliance Register_Water monitoring testing -GSF water testing April 2025 Glenellen Solar Farm – Sediment and Erosion Control Plan_27092024	No water pollution issues noted during site inspection	Compliant
Operating Conditions					



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B30	<p>The Applicant must:</p> <p>(a) minimise any soil erosion and control sediment generation;</p> <p>(b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual and the Managing Urban Stormwater: Soils and construction - Volume 2A manual (Landcom, 2008), or their latest versions;</p> <p>(c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site;</p> <p>(d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site;</p> <p>(e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and</p> <p>(f) ensure all works within waterfront land is undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (DPE, 2022), unless the Water Group agrees otherwise.</p>	Not Triggered	Not in operation		Not Triggered
<b>HAZARDS</b>					
<b>Storage and Handling of Dangerous Goods</b>					
B31	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	Triggered	Ste Inspection Site photos	Minor amounts of paint etc. Fuel storage area identified and under bunding construction	Compliant
<b>Operating Conditions</b>					
B32	<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> <p>(i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; and</p> <p>(ii) is suitably equipped to respond to any fires on site, including provision of four 10,000 litre water supply tanks fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection;</p> <p>(iii) includes a 10 metre defensible space around the perimeter that permits unobstructed vehicle access; and</p> <p>(iv) manages the defensible space and solar array areas as an Asset Protection Zone; and</p> <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.</p>	Triggered	Bushfire mgt plan draft	Bushfire mgt plan in prep 4 x tanks 45,000L with fittings as required awaiting installation and connections.	Compliant
<b>Emergency Plan</b>					

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B33	<p>Prior to commencing construction of the solar farm, the Applicant must develop and implement a comprehensive Emergency Plan and detail emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre and FRNSW. The plan must:</p> <p>(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);</p> <p>(b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</p> <p>(c) include availability of fire suppression equipment, access and water;</p> <p>(d) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</p> <p>(e) include fire and bushfire emergency management planning, including:</p> <p>(i) details of the location, management and maintenance of the Asset Protection Zone;</p> <p>(ii) a list of works that must not be carried out during a total fire ban; and</p> <p>(iii) details of how RFS would be notified, and procedures that would be implemented, in the event that:</p> <ul style="list-style-type: none"> <li>• there is a fire on-site or in the vicinity of the site;</li> <li>• there are any activities on site that would have the potential to ignite surrounding vegetation; or</li> <li>• there are any proposed activities to be carried out during a bushfire danger period;</li> </ul> <p>(f) detail specific response measures in the case of flood to ensure site safety;</p> <p>(g) describe the specific emergency exit routes to be used in the case of flood and include evidence of access agreements with relevant landowners (e.g. right of carriageway); and</p> <p>(h) include an Emergency Services Information Package in accordance with Emergency services information package and tactical fire plans (FRNSW, 2019), to the satisfaction of FRNSW.</p>	Triggered	Emergency Response Plan Consultation request 23/8/24	Emergency response plan developed and implemented. Plan provided to FRNSW Ongoing FRNSW consultation on details of access and arrangements occur between GPG and FRNSW Information package provided August 2024. FRNSW consulted as part of the audit and no additional scope items were identified for consideration.	Compliant
B34	<p>The Applicant must:</p> <p>(a) implement the Emergency Plan and Emergency Services Information Package required under condition B33 for the duration of the development; and</p> <p>(b) keep two copies of the Emergency Plan and Emergency Services Information Package on-site in a prominent position adjacent to the site entry points at all times.</p>	Triggered	Emergency Response Plan Site Inspection	Plan easily located in site offices	Compliant
WASTE					

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B35	<p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> <p>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal (in consultation with Council for use of Council facilities).</p>	Triggered	<p>Waste reports on mgt system</p> <p>Waste dockets and GPG RFI to Monford 2/4/25</p> <p>DPHI email RFI 18/3/25</p> <p>GPG RFI response 2/5/25</p> <p>Laydown Inspection Checklist - F1.591336</p>	<p>An issue was raised in compliant register relating to waste going offsite to unauthorised location. Waste stockpiling was considered to be excessive and contributing to the wind blown materials in adjacent properties.</p> <p>A second issue was raised in a complaint relating to unlawful disposal of wastes. Waste is documented as being disposed of to two locations locally, 1. Cleanaway facility at Lavington and 2. The Rockyard facility at Albury. Waste disposal dockets for February and March 2025 were reviewed and supported the 2 locations as receiving materials. It was noted in further review that 'Cardboard' is collected by The Rockyard reportedly for use in mulch manufacture (this could not be confirmed by the auditor at the time of the audit) and Cleanaway collect general waste and liquid waste. Cleanaway is noted to have an EPL in force which covers these wastes, no waste licence could be located for the Rockyard premises.</p> <p>Additional information provided in May 2025 by GPG indicates that after the time of the audit the RockYard facility proposed to transport the materials originally collected at the site to an alternative facility. This has not been verified by the auditor.</p> <p>Regardless of the outcomes, it appears evident that waste materials were transported to a location which was not licensed to receive them.</p> <p><b>SSD9550 - NCR#4 - Waste on site to be managed to prevent wind blown materials leaving site and all wastes to be disposed of to lawful locations.</b></p>	Non-compliant
ACCOMMODATION AND EMPLOYMENT STRATEGY					
B36	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development. This strategy must:</p> <p>(a) be prepared in consultation with Council and informed by consultation with local accommodation and employment service providers;</p> <p>(b) propose measures to ensure there is sufficient accommodation for the workforce associated with the development;</p> <p>(c) consider the cumulative impacts associated with other State significant development projects in the area;</p> <p>(d) investigate options for prioritising the employment of local workers and use of local businesses during construction and operation of the development, where feasible;</p> <p>(e) give consideration to strategies that leave a positive community legacy and maximise local economic contribution; and</p> <p>(f) 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 upgrading and decommissioning.</p> <p>The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction and implement the plan throughout construction.</p>	Triggered	<p>NGH AES Final Draft V4 - 16/2/24</p> <p>DPHI PA-8 16/2/24 - AES submission</p>	<p>AES prepared in consultation with Council</p> <p>plan on website</p> <p>AES sent to DPHI PA-8 16/2/24 prior to construction</p> <p>Stage of work does not require employees outside of local area workers, contractors on site are all local at this stage of work.</p>	Compliant
DECOMMISSIONING AND REHABILITATION					

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B37	<p>Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development which shall be updated by the Applicant half-way through the operational life of the project, and within 2 years prior to decommissioning. The Plan must:</p> <p>(a) include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3 below; and</p> <p>(b) describe the measures that would be implemented to:</p> <p>(i) decommission the development and rehabilitate the site in accordance with the objectives in Table 3;</p> <p>(ii) minimise and manage the waste generated by the decommissioning of the development;</p> <p>(iii) include a program to monitor and report on the implementation of these measures against the detailed completion criteria; and</p> <p>(iv) ensure that best practice is employed in respect of utilising available recycling technologies.</p>	Not Triggered		Not operational at the time of the audit	Not Triggered
B38	<p>Within 18 months following the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.</p>	Not Triggered		Not operational at the time of the audit	Not Triggered
<b>PART ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>					
<b>ENVIRONMENTAL MANAGEMENT</b>					
<b>Environmental Management Strategy</b>					
C1	<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> <p>(a) provide the strategic framework for environmental management of the development;</p> <p>(b) identify the statutory approvals that apply to the development;</p> <p>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(d) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance; and</p> <p>(v) respond to emergencies; and</p> <p>(e) include:</p> <p>(i) references to any strategies, plans and programs approved under the conditions of this consent; and</p> <p>(ii) a clear plan depicting all the monitoring to be carried out in relation to the development.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	Triggered	<p>EMS Eco Logical Australia V6 23/8/24</p> <p>EMS prepared and approved PA 7 26/8/24</p>	<p>EMS prepared, approved and implemented on site.</p> <p>EMS contains all elements of the condition and examples of implementation include:</p> <ul style="list-style-type: none"> <li>- Statutory approvals identified and available in site offices</li> <li>- Complaints logged and responded to as required</li> </ul>	Compliant
<b>Revision of Strategies, Plans and Programs</b>					
C2	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the:</p> <p>(i) submission of an incident report under condition C10 of SCHEDULE 2;</p> <p>(ii) submission of an audit report under condition C14 of SCHEDULE 2; or</p> <p>(iii) any modification to the conditions of this consent.</p>	Triggered		No updates required at the time of the audit. The submission of the audit report will trigger a review of plans under this condition.	Compliant
<b>Updating and Staging of Strategies, Plans or Programs</b>					

SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
C3	With the approval of the Planning Secretary, the development may be staged and the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Triggered		No updates required at the time of the audit. Updates to several management plans are noted.	Compliant
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Triggered		No updates required at the time of the audit. Updates to several management plans are noted.	Compliant
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Triggered		No updates required at the time of the audit. Updates to several management plans are noted.	Compliant
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Not Triggered		No updates or requests received or required at the time of the audit	Not Triggered
<b>NOTIFICATIONS</b>					
<b>Notification of Department</b>					
C7	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.	Triggered	DPHI notification prior to construction 23/8/24	Construction notification 23/8/24 for start on 26/8/24. Operation is currently scheduled for Quarter 4 2025 to commence commissioning.	Compliant
<b>Final Layout Plans</b>					
C8	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website including details on the siting of solar panels and ancillary infrastructure. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	Triggered	Plan submitted Sept 2024 Extension requested due to heritage impacts and approved 25/10/24 (PA-21)	All plans required have been submitted in accordance with this condition at the time of the audit.	Compliant
<b>Work as Executed Plans</b>					

SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
C9	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.	Not Triggered		Site not operational at the time of the audit.	Not Triggered
Incident Notification					
C10	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 8.	Triggered	None to date	No incidents had been recorded at the time of the audit.	Compliant
Non-Compliance Notification					
C11	The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance.	Triggered	None to date	No non-compliance had been identified prior to the time of the audit.	Compliant
C12	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Triggered	None to date	No non-compliance had been identified prior to the time of the audit.	Compliant
C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Triggered	None to date	No non-compliance had been identified prior to the time of the audit.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT					
C14	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	Triggered	SSD-9550-PA-28 - Auditor approval	Auditor approval was gained on 10 March 2025 This audit has been undertaken in accordance with the IAPAR 2020 guidelines	Compliant
C15	Deleted	Not Triggered			Not Triggered
C16	Deleted	Not Triggered			Not Triggered
C17	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C14 of SCHEDULE 2 of this consent where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (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.	Triggered		The Applicants response to audit findings is separate to this audit report	Compliant



SSD 9550 - Glenellen Solar Farm (GSF) Environmental Compliance Audit #2 - 14-17/04/2025					
CoA #	Requirement	Triggered for audit period	Evidence collected	Audit findings and recommendations	Compliance Status (Compliant/Non-compliant / Not triggered)
C18	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Triggered	SSD-9550-PA-25 - EOT	An extension of time for the audit report was granted on 12/6/25 due to auditor annual leave in May 2025 impacting completion of the report. Due date for report is now 20 June 2025	Compliant
ACCESS TO INFORMATION					
C19	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan); (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) compliance reports; (ix) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (x) any other matter required by the Planning Secretary; and (b) keep this information up to date.	Triggered	Project website operational: <a href="https://glenellensolarfarm.globalpower-generation.com.au/">https://glenellensolarfarm.globalpower-generation.com.au/</a>	Website includes links for information as required, the current 'Newsletters' link connects to the complaints form and should be updated.  SSD 9550 REC#2 - Update and review links to ensure information is up to date and links to correct attachments	Compliant
	<b>Modifications</b>				
	MOD 1 - Modification to correct minor errors in consent	23/08/2024			
	MOD 2 - Access road from the Jindera Zone Substation to the Glenellen Solar Farm Collector Substation	in prep			

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# Appendix E

## Audit Findings Register

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SSD 9550 Glenellen Solar Farm - NCR-OPP Register						
Audit Reference	NCR or Opportunity #	Condition Number ID	Compliance Requirement	Date raised	Independent Audit Finding	Independent Audit Recommendation
IEA#2	SSD 9550 NCR#2	B20, B21,	<p>B20 - Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <p>(a) 7 am to 6 pm Monday to Friday;</p> <p>(b) 8 am to 1 pm Saturdays; and</p> <p>(c) at no time on Sundays and NSW public holidays.</p> <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Planning Secretary:</p> <p>the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; and emergency work to avoid the loss of life, property and/or material harm to the environment.</p> <p>B21 - The hours of construction activities specified in condition B20 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <p>(a) considered on a case-by-case or activity-specific basis;</p> <p>(b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours;</p> <p>(c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Council (and other relevant agencies) has been or will be undertaken;</p> <p>(d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and</p> <p>(e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or latest version.</p>	15/04/2025	<p>Works undertaken outside of hrs with no approval. Complaint received on 23 March 2025.</p> <p>Noise from work on Sundays noted via complaints (23 March 2025).</p> <p>EPC not approved to undertake piling works. Noise Mgt Plan issued to TransGrid and Monford on 3 March 2025.</p>	Obtain approval as per B21 for all works required outside of approved hours.
	SSD 9550 NCR#3	B23	The Applicant must ensure all activities occurring at the Site are carried out in a manner that minimises dust including the emission of wind-blown or traffic generated dust.	15/04/2025	The site was observed to be very dusty due to dry conditions, water carts (2) were noted to be in operation however a large amount of haul road was in use across the site with minimal to no water in many areas in use at the time of the inspection. Dust noted to be largely confined to site, wind was low to calm at the time of the inspection. Toolbox talk on 20/3/25 indicated that 20km per hr speed limit for site traffic to be enforced. Excessive speed estimated to be well above 20km/hr noted to be a key contributor to dust at the time of the audit.	Maintain dust suppression practices and control speed on roads to maintain dust levels in accordance with approval conditions.
	SSD 9550 NCR#4	B35	<p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> <p>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal (in consultation with Council for use of Council facilities).</p>	15/04/2025	<p>Issue relating to waste from site on adjacent property raised in compliant register. Wastes (plastic wrapping) noted to be present in adjacent farmland due to large amount of wastes stockpiled on the site and windy conditions preceding audit.</p> <p>Complaint also raised in relation to waste disposal offsite to an unauthorised location. NSW EPA advise they are investigating this issue.</p> <p>Monthly report , waste disposal dockets for month of March 2025.</p>	Waste on site to be managed to prevent wind blown materials leaving site and all wastes to be disposed of to lawful locations.

Audit Reference	NCR or Opportunity #	Condition Number ID	Compliance Requirement	Date raised	Independent Audit Finding	Independent Audit Recommendation
	SSD 9550 REC#1	B27	<p>Prior to carrying out any construction, the Applicant must prepare a Heritage Management Plan for the development and submit it to the Planning Secretary for approval. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be prepared in consultation with Heritage NSW and Registered Aboriginal Parties;</p> <p>(c) include a description of the measures that would be implemented for:</p> <p>(i) protecting the heritage items located outside the approved Development footprint;</p> <p>(ii) salvaging and relocating the heritage items located within the approved Development footprint, as identified in Table 1 of APPENDIX 7;</p> <p>(iii) a contingency plan and reporting procedure if:</p> <ul style="list-style-type: none"> <li>• previously unidentified heritage items are found; or</li> <li>• Aboriginal skeletal material is discovered;</li> </ul> <p>(iv) 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</p> <p>(v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</p> <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	13/06/2025	The revised HMP is shown as V2 from 13/3/25. As this is an update from the approved V8 document from 15/7/24 the revision number should be updated for continuity. Once finalised the document must be resubmitted to DPHI for approval and once approved must be implemented.	Update revision number for continuity with previously approved document.
	SSD 9550 REC#2	C19	<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> <p>(i) the EIS;</p> <p>(ii) the final layout plans for the development;</p> <p>(iii) current statutory approvals for the development;</p> <p>(iv) approved strategies, plans or programs required under the conditions of this consent (other than the Emergency Plan);</p> <p>(v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</p> <p>(vi) how complaints about the development can be made;</p> <p>(vii) a complaints register;</p> <p>(viii) compliance reports;</p> <p>(ix) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</p> <p>(x) any other matter required by the Planning Secretary; and</p> <p>(b) keep this information up to date.</p>	13/06/2025	Website includes links for information as required, the current 'Newsletters' link connects to the complaints form and should be updated.	Update and review links to ensure information is up to date and links to correct attachments

## **Australia**

### **SYDNEY**

Level 10 201 Pacific Highway  
St Leonards NSW 2065  
T 02 9493 9500

### **NEWCASTLE**

Level 3 175 Scott Street  
Newcastle NSW 2300  
T 02 4907 4800

### **BRISBANE**

Level 1 87 Wickham Terrace  
Spring Hill QLD 4000  
T 07 3648 1200

### **CANBERRA**

Suite 2.04 Level 2  
15 London Circuit  
Canberra City ACT 2601

### **ADELAIDE**

Level 4 74 Pirie Street  
Adelaide SA 5000  
T 08 8232 2253

### **MELBOURNE**

Suite 9.01 Level 9  
454 Collins Street  
Melbourne VIC 3000  
T 03 9993 1900

### **PERTH**

Suite 3.03  
111 St Georges Terrace  
Perth WA 6000  
T 08 6430 4800

## **Canada**

### **TORONTO**

2345 Yonge Street Suite 300  
Toronto ON M4P 2E5  
T 647 467 1605

### **VANCOUVER**

2015 Main Street  
Vancouver BC V5T 3C2  
T 604 999 8297

### **CALGARY**

700 2nd Street SW Floor 19  
Calgary AB T2P 2W2



[linkedin.com/company/emm-consulting-pty-limited](https://www.linkedin.com/company/emm-consulting-pty-limited)



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