

Date: 16 September 2022
Our Reference: NESF1-GLC-EN-00GRL-AUD-004

Planning Secretary
NSW Department of Planning and Environment

Attention: Planning Secretary, Department of Planning and Environment

**RE: NEW ENGLAND SOLAR FARM INDEPENDENT ENVIRONMENTAL AUDIT –
APPLICANT'S RESPONSE UPDATE AND MANAGEMENT PLAN REVISIONS**

On 17 August 2022, the New England Solar Farm (NESF) Independent Environmental Audit Report and Applicant's Response was submitted to the NSW Department of Planning and Environment (DPE).

In accordance with Condition 11C of the development consent, and Section 4.3.2 of the Independent Audit Post Approval Requirements (2020), the Applicant's Response included actions and timing against each non-compliance. A key commitment was to provide an update on the status of each action to DPE in one month (unless agreed otherwise with DPE).

Accordingly, Table 1 provides updates for non-compliances with ongoing actions in red. The updates have been prepared by the Applicant of the NESF (ACEN Australia Pty Ltd [ACEN]) and the engineering, procurement and construction contractors for the NESF (Green Light Contractors Pty Ltd [GLC]).

Schedule 4, Condition 2 requires the Applicant to review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary by 17 September 2022 (i.e. 1 month after submission of the Independent Environmental Audit Report). Table 2 lists the management plans required by this consent, and a summary of the review undertaken following the Independent Audit Report submission. The revised management plans were submitted to DPE post approvals/assessments by 16 September.

Please don't hesitate to contact me if you would like to discuss the responses.

Yours sincerely,



Tim Greenaway
NESF Project Director
ACEN Australia

Table 1 New England Solar Farm 2022 Independent Audit – Recommendations

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 3	<p>Non-compliance No. 1 – On the following occasions during the audit period UPC did not comply with this condition:</p> <ul style="list-style-type: none"> - Evidence was provided demonstrating that during the audit period, a vehicle associated with the development travelled via Barleyfields Road (South) which is not an approved access route. 	<p>Recommendation No. 1 – UPC should implement measures to monitor vehicles to ensure correct use of authorised access routes and access points.</p>	<p>On 30 April 2021, a water truck accessing the site travelled on Barleyfields Road (south) which is not on the approved access route. DPE was notified of this non-compliance on 5 May 2021.</p> <p>Following the non-compliance, corrective actions were implemented in consultation with DPE and Council, including regular reminders to site personnel and installation of signage regarding the approved access route. In addition to these actions, UPC\AC began ongoing periodic monitoring of Barleyfields Road (south) to ensure site personnel are using the correct access route.</p> <p>As per the auditor's recommendation, UPC\AC will continue periodic monitoring of Barleyfields Road (south) for the duration of construction, and implement additional actions if further non-compliances are identified.</p> <p>No additional action is proposed.</p>


Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)								
3, 4	Non-compliance No. 2 – UPC was unable to provide evidence to verify that the remaining works to Barleyfields Road and Big Ridge Road Segments 1 and 3, as identified and required by Uralla Shire Council, were completed by 10 th March 2022 as required by Council.	Recommendation No. 2 – UPC should ensure and obtain Council’s formal notification that the conditions identified in Councils correspondence dated 17/02/2022 have been satisfied.	<p>Council’s correspondence dated 17 February 2022 included three commitments from UPC which it found provided sufficient evidence to allow works to progress on site consistent with Council resolution “X02.02/22”. The three commitments were –</p> <table><tr><th>Commitments</th><th>Actions Taken</th></tr><tr><td>The provision of ANZ Bank Guarantee provided on 16 February 2022 for \$300,000.</td><td>Completed on 16 February 2022. No further action required.</td></tr><tr><td>A commitment to provide a revised Bank Guarantee extending the expiry date to 28 February 2023.</td><td>The Bond expiry date was extended to 28 February 2023 on 10 March 2022.</td></tr><tr><td>The proposed remediation works to be completed in accordance with the schedule discussed on 16 February 2022.</td><td>The schedule discussed at the meeting on 16 February 2022 included completion of works after 10 March 2022. Works were completed largely in accordance with this schedule.</td></tr></table> <p>A close out package regarding completion of the access roads was provided to USC dated 15 June 2022. We refer to USC email dated 14 February 2022 in which Council stated -</p> <p><i>“Please note that subsequent to the works having been completed an appropriate proving period of 4 to 8 weeks would be required before Council could validate whether or not the works had been completed to Council’s satisfaction.”</i></p> <p>The timing to seeking Council signoff to the road upgrades was to ensure that “an appropriate proving period” had occurred so that Council could validate whether the works have been completed to Council satisfaction.</p> <p>UPC\AC is currently awaiting formal notification that USC is satisfied the nominated identified defects to the road upgrades have been addressed, and USC will release the Bank Guarantee for \$300,000. UPC\AC has continued open discussions with USC including a meeting on 25 June where USC confirmed the matter was under review.</p> <p>UPC\AC has had further open discussions with USC on this matter on 21st July, 9th August and 11th August 2022. USC noted that a recent break-out of COVID 19 amongst USC staff had restricted their ability to review the submitted documentation. UPC were requested by USC to provide additional information regarding protocol for assessment of required maintenance of the access roads which UPC\AC will submit for their review by 19th August 2022.</p> <p>Action: An update on the status of the formal notification will be provided to DPE. Timing: 1 month.</p> <p>Following the submission of additional requested information on 19th August 2022, a reply from USC was received on 1 September 2022 noting that a significant number of the repairs as detailed were completed and are satisfactory. The response highlighted a small number of unsuccessful repairs which GLC are currently addressing dependent upon favourable weather conditions and availability of traffic control crews. Of the original noted 43 items on the defects list, 8 areas require a cement stabilised patch.</p> <p>Action: Provide a further update on the status of the formal notification. Timing: 1 month.</p>	Commitments	Actions Taken	The provision of ANZ Bank Guarantee provided on 16 February 2022 for \$300,000.	Completed on 16 February 2022. No further action required.	A commitment to provide a revised Bank Guarantee extending the expiry date to 28 February 2023.	The Bond expiry date was extended to 28 February 2023 on 10 March 2022.	The proposed remediation works to be completed in accordance with the schedule discussed on 16 February 2022.	The schedule discussed at the meeting on 16 February 2022 included completion of works after 10 March 2022. Works were completed largely in accordance with this schedule.
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Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 6	<p>Non-compliance No. 3 - As of May 2022, the following aspects of the Traffic Management Plan (TMP) were not being implemented:</p> <ul style="list-style-type: none"> - Regarding the disciplinary procedure (section 3.25) of the TMP, there was no evidence provided to verify that the procedure was implemented for the non-conformance reported to the Planning Secretary on 05/05/2021 for the non-compliance that occurred on 30/04/2021. 	<p>Recommendation No. 3 – UPC should ensure all required elements of the TMP are implemented.</p>	<p>Action: Relevant site personnel, including the Project manager, construction manager, site manager and HSE manager will be reminded of the TMP disciplinary procedure and requested that any future instances are documented and retained as evidence. Timing: Complete.</p> <p>Action: all contractors will be reminded of the approved access route and disciplinary procedure through a pre-start. Timing: Complete.</p>
3, 10	<p>Non-compliance No. 4 – The Secretary agreed to a deferment of the retirement of the biodiversity credits subject to UPC retiring the biodiversity credits by 31st March 2021. UPC retired the biodiversity credits with payment to the BCT on the 12 May 2021, which did not satisfy the DPE's required timeframe.</p>	<p>Recommendation No. 4 – UPC should ensure any actions requested by the Secretary are completed within the required timeframe.</p>	<p>The delay in payment was due to a clerical error. Correspondence with DPE during this period did not record that the department was dissatisfied that the payment was made on 12 May 2021.</p> <p>No further action is proposed.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 13	<p>Non-compliance No. 5 – No evidence was able to be provided to verify the following best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009) and listed in Table 11 (section 7.1) of the CNVMP:</p> <ul style="list-style-type: none"> - during the first month of construction, conducting one round of attended noise monitoring at site boundaries and closest residences; - during the first month of construction, carrying out noise level checks (Sound Power Levels) on all critical items of plant (equipment noise certificates were provided post audit however test dates were outside the audit period and not within the first month of construction); and - instructing all site personnel during a general induction as to their responsibilities in minimising noise and adhering to the noise minimisation measures. 	<p>Recommendation No. 5 – UPC should ensure all required environmental management control measures to minimise the noise generated by any construction activity, developed in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009) and as listed in Table 12 of the CNVMP are implemented.</p>	<p><i>Attended noise monitoring</i></p> <p>Noise modelling was conducted as part of the CNVMP for Stage 1. The modelling concluded that some private receivers to the north-east of Stage 1 would be 'noise affected' during construction. No other private receivers (i.e. in other directions) would be 'noise affected', and no private receivers would be 'highly noise affected'.</p> <p>A continuous (24/7) noise monitor has been installed at the site boundary between construction activities and the private receivers expected to be 'noise affected'.</p> <p>Attended noise monitoring has also been conducted at residences and other representative roadside locations within 1 month of piling activities commencing in PCU block adjacent the north-east site boundary (i.e. closest to the noise affected receivers) to verify the noise modelling predictions.</p> <p>Action: The process above will be incorporated into the CNVMP. An update on the status of the CNVMP update will be provided to DPE within 1 month. Timing: 1 month.</p> <p>Complete. The CNVMP has been updated to reflect the completion of attended noise monitoring by Miller Acoustic Consulting at nearby residences and representative roadside locations, as well as the installation of a continuous noise monitor. The attended noise monitoring report concluded that "noise emissions generated by construction activities were audible on occasions, although complied with relevant construction noise criteria as per the ICNG".</p> <p>No further action is proposed.</p> <p><i>Testing of critical items of plant</i></p> <p>GLC conducts testing of noise critical equipment within 1 month of it being brought to site and used. It is not feasible to test contractor equipment off-site prior to commissioning.</p> <p>The CNVMP monitoring schedule says "carry out equipment noise level checks on all critical items of plant and issue Equipment Noise Certificates" during the first month of construction, and "carry out equipment noise level checks on any new (untested) items of critical plant and issue Equipment Noise Certificates" during subsequent months of construction.</p> <p>The first statement will be updated to say "carry out equipment noise level checks on all critical items of plant <u>on site</u>".</p> <p>No further action is proposed.</p> <p><i>Instructions to minimise noise</i></p> <p>All site personnel are regularly reminded to minimise noise as far as practical through pre-starts and toolboxes on site.</p> <p>Action: the induction will be updated to include instructions on minimising noise and adhering to the noise minimisation measures. Timing: Complete.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 19	<p>Non-compliance No. 6 – As of May 2022, UPC did not satisfy the following requirements of this condition:</p> <ul style="list-style-type: none"> the requirement to consult with Heritage NSW was not included in the HHMP, and therefore no evidence existed to indicate that consultation with Heritage NSW was undertaken; the points listed in section 4.2.1 of the HHMP have not been conveyed in the site induction material; and 	<p>Recommendation No. 6 – UPC should review and update the Aboriginal Heritage Management Plan and Historical Heritage Management Plan and ensure all required elements are included and implemented.</p>	<p><i>Consultation with Heritage NSW</i></p> <p>A letter from NSW Heritage Council dated 11 November 2019 states that review of the HHMP is not required, given that the project will not impact State Heritage Register items or historical archaeological relics/sites.</p> <p>The HHMP was subsequently approved by DPIE (now DPE) on 21 October 2020.</p> <p>The HHMP is currently under review and this correspondence will be included in the next revision.</p> <p>Action: UPC\AC will provide DPE with a status update on the HHMP revision within 1 month. Timing: 1 month.</p> <p>The revised HHMP has been submitted to DPE including the letter from NSW Heritage Council (Appendix G of the HHMP) confirming that NSW Heritage Council's review of the HHMP is not required.</p> <p>No further action is proposed.</p> <p><i>Induction Material</i></p> <p>Items of historic heritage are referenced in the induction (slide 20).</p> <p>Action: The induction will be augmented to include all the points identified in Section 4.2.1 of the HHMP. Timing: Complete.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 21	Non-compliance No. 7 – The Soil and Water Management Plan (Section 4.5) adopts a minimum sediment control Type 2 structure (Rock Filter Dam with geotextile) to be used on the NESF construction site. However, based on the audit site inspection (see Photo 26 and Photo 27), sediment fences have been installed where long term rock filter dams have been specified on the ESCP (Dwg No: NESF1-SMEC-CW-00DRN-DWG-131), which is inconsistent with the ESCP and could result in sediment being introduced into waters.	Recommendation No. 7 – UPC should ensure all sediment control structures are installed in accordance with the ESCPs and the Soil and Water Management Plan.	<p>GLC believes that the use of sediment fences at the two locations identified in the audit report is suitable. Notwithstanding, the existing sediment fences at both locations will be replaced with rock filter dams for consistency with Dwg No: NESF1-SMEC-CW-00DRN-DWG-131.</p> <p>In addition, a site-wide review of erosion and sediment control structures/measures will be conducted. An update on the status of the site ESC review will be provided to DPE within 1 month.</p> <p>Action: Install rock filter dams at the two specified locations and provide an update on site ESC review. Timing: 1 month.</p> <p>Rock filter dams were installed at the specified locations in August 2022 as per the IEA recommendation. Photos comparing the audit inspection (5 May) and additional controls (installed in August) are provided below.</p> <div data-bbox="992 646 2069 1046">  </div> <p><i>Installation of rock filter dam at northern side of Site Compound and Main Warehouse Area A (5 May vs 16 August)</i></p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 21 (cont)			 <p><i>Installation of rock filter dam at earthworks cut and fill area in PCU-221 (5 May vs 15 August)</i></p> <p>The Site ESC review is currently underway in consultation with SMEC Holdings Limited. The review process has identified that some control structures should be moved or changed to better reflect current construction activities.</p> <p>While the Site ESC review is in progress, GLC will continue to implement, inspect, and maintain erosion and sediment control structures across all work areas. GLC will implement any recommendations from the Site ESC review as soon as practical.</p> <p>Action: Finalise the Site ESC review and provide an update on implementation of any recommendations. Timing: 1 month.</p>
3, 25	Non-compliance No. 8 – Regarding the fourth dot point of paragraph (b) of this condition, at the time of this audit, a 20,000-litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road had not been installed to respond to any fires on site.	Recommendation No. 8 – UPC should procure and install a 20,000-litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection in order to respond to any fires on site.	<p>A 150,000 L water supply tank with a Storz fitting and FRNSW compatible suction is present on site and was visited during the site audit. However, it's acknowledged that the water tank is used for firefighting purposes as well as dust suppression.</p> <p>Action: A dedicated 20,000 L water tank will be procured as per the auditor's recommendation. Timing: Complete.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 27	Non-compliance No. 9 – In relation to paragraph (d) of this condition, there was evidence that excavated waste material (from the road upgrades) was received on site during this audit period.	Recommendation No. 9 – It is recommended that UPC not use any stockpiled waste material (from the road upgrades) on site until the reuse of the material is reviewed and relevant approval granted.	<p>Material temporarily stockpiled within the development footprint has come from within the “road upgrade disturbance boundary” approved through Modification 1 and shown in Appendix 4.</p> <p>Given the road upgrades are required by the development consent as part of the Project and are shown on Appendix 1, GLC’s interpretation was that the road upgrade disturbance boundary forms part of the “site”.</p> <p>GLC proposes to consult with DPE regarding temporary stockpiling of ENM in order to confirm this would be compliant with the development consent, or otherwise seek the Secretary’s discretion to re-use the ENM material on site (subject to obtaining an ENM exemption) in the interest of minimising waste generation.</p> <p>If the Secretary does not agree to the above, the temporarily stockpiled material will be sent to an appropriately licensed waste facility for disposal.</p> <p>Action: DPE will be consulted regarding re-use of excess material on site. Timing: 1 month.</p> <p>ACEN Australia, GLC and DPE held a meeting on 2 September 2022 to discuss non-compliance 9. As an outcome of the meeting, DPE requested further information regarding the stockpiled material. ACEN Australia provided a response to RFI-47989706 on 9 September 2022 and is awaiting feedback from DPE.</p> <p>Action: ACEN Australia and GLC will continue to consult with DPE regarding this matter as required. Timing: Ongoing.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 28	<p>Non-compliance No. 10 – UPC was not able to provide evidence that it had fully implemented aspects of the Accommodation and Employment Strategy (AES) as follows:</p> <ul style="list-style-type: none"> Section 6.3 of the AES states that leading up to and during construction, the AES would be reviewed at least every six months. Some evidence was provided to show consultation with accommodation providers was undertaken in March 2021, however, no evidence was provided to show that the AES had been reviewed or updated since approved in the 12 month period prior to the commencement of construction. Section 5.3 of the AES states that consultation will be undertaken with local councils (Uralla Shire Council, Armidale Regional Council and Tamworth Regional Council) prior to construction commencing and during construction to ensure an appropriate plan for transient worker housing is in place and there is no other unexpected pressures on local facilities due to the Project. No evidence was provided to show that the consultation with local councils (other than Uralla Shire Council) had been undertaken prior to construction. 	<p>Recommendation No. 10 – UPC should:</p> <ul style="list-style-type: none"> review and if necessary, update the Accommodation and Employment Strategy considering the changes made to the construction schedule (and cumulative impacts) and general circumstances regarding accommodation in the locality of the development; and undertake consultation with Armidale Regional Council and Tamworth Regional Council as committed to in the approved AES. 	<p><i>AES Review</i></p> <p>The AES was reviewed in March 2021 and December 2021, however GLC does not have records of all aspects of the AES being reviewed.</p> <p>As per the auditor's recommendation, the AES will be fully reviewed to consider the construction schedule, cumulative impacts and general circumstances.</p> <p><i>Consultation with councils regarding housing</i></p> <p>GLC maintains a database of available long and short-term accommodation in the region, and periodically consults with short term accommodation providers (mostly motels) to gauge changes in bookings and general availability.</p> <p>Consultation will be undertaken with Uralla, Armidale and Tamworth councils to identify any potential pressures on local housing facilities. Any major festivals or annual events in the region will be included in Table 5.1 of the AES.</p> <p><i>Consultation with medical facilities</i></p> <p>Site personnel with minor injuries are sent to Uralla Medical Centre as it is the closest medical facility to the NESF. More serious issues require transport to Armidale (e.g. the Armidale Hospital).</p> <p>Consultation will be undertaken with medical facilities in Uralla, Armidale and Tamworth to confirm available services. The outcomes will be incorporated into the FERP.</p> <p>Action: The AES will be reviewed and updated to reflect consultation with councils and medical facilities. An update on the status of the AES review will be provided to DPE within 1 month. Timing: 1 month.</p> <p>The AES has been updated to incorporate the IEA non-compliance 10 recommendation and other updates, including:</p> <ul style="list-style-type: none"> A review of the construction schedule and workforce estimate, including updates to Section 3 and Figure 3.1. Consultation with Uralla, Armidale and Tamworth to identify any major festivals or annual events in the region that could potentially pressure local housing facilities (noting that only Tamworth has provided feedback to date). Notwithstanding, Table 5.1 has been updated based on a review of council event webpages. Consultation with medical facilities in the region (noting that no responses have been obtained to date since correspondence in July 2022). Other general updates. <p>The revised AES (Revision 3) was submitted on 16 September 2022. No further action is proposed.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
3, 28 (cont)	<ul style="list-style-type: none"> Section 6.2 (second dot point) states that GLC will incorporate the levels of medical services (i.e. which facilities provide particular levels of service) in each jurisdiction in the Emergency Response Plan (ERP). No evidence was provided to show that these levels of service are incorporated in the ERP. 		
4, 1	<p>Non-compliance No. 11 – In relation to Revision 4.1 of the Environmental Management Strategy (EMS), no evidence was provided to verify:</p> <ul style="list-style-type: none"> an updated Monitoring Schedule summarising all monitoring requirements associated with the NESF was posted on the NESF website, as per section 11.4 of the EMS; that attended noise monitoring for construction (including equipment noise level checks) during first month of construction (Table 11-1) was conducted; that the environmental induction includes (at a minimum) all dot points described in section 4.5.1 of the EMS. 	<p>Recommendation No. 11 – UPC should review all measures described in the Environmental Management Strategy and ensure these measures are implemented as required.</p>	<p><i>Monitoring schedule</i></p> <p>The NESF monitoring schedule is now available on the NESF website. The monitoring schedule will be reviewed and updated (if required) following the next revision of the EMS.</p> <p>No other action is proposed.</p> <p><i>Attended noise monitoring</i></p> <p>Refer to the response to NC5.</p> <p><i>Environmental induction</i></p> <p>The site induction will be reviewed and updated to ensure it includes all the dot points provided in Section 4.5.1 of the EMS. It is noted that most of these requirements are already addressed.</p> <p>Action: the site induction will be reviewed and updated. Timing: Complete.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
4, 2	Non-compliance No. 12 – UPC was unable to demonstrate that relevant environmental strategies, plans and programs had been reviewed (and if necessary revised) within 1 month of the the modification to the conditions of this consent (Modification 1 was determined 19 th February 2021).	Recommendation No. 12 – As required by this condition, within 1 month of submitting this audit report, UPC should review the strategies, plans or programs required under this consent. UPC should formally advise the Secretary which plans were reviewed and which plans will be revised, and by when.	<p>Modification 1 involved changes to the road upgrade disturbance footprint to allow road upgrades to be completed. The BMP (Version 7) was updated on 23 February 2021 to reflect Modification 1.</p> <p>The AHMP and HHMP did not require updates as the Modification Report concluded that there would be no predicted impacts to heritage items associated with the modification.</p> <p>Similarly, the modification did not require an update to the EMS, AES, TMP or Water Supply Strategy.</p> <p>Action: UPC\AC will formally advise DPE which approved management plans require review and revision within 1 month of submitting the re-issued audit report. Timing: 1 month.</p> <p>The review and revision of management plans is described in Table 2 below. No further action is proposed.</p>
4, 9	Non-compliance No. 13 – Regarding the non-conformance notification dated (5 May 2021) to DPE for the 30 April 2021 non-compliance, no reason for the non-compliance was included in the notification provided to DPE.	Recommendation No. 13 – UPC should ensure the reason for non-compliances is included in the non-compliance notification. UPC could consider developing a non-conformance template to ensure all the requirements of this condition are addressed.	<p>The reason for the subcontractor driver deviating from the approved access route had not been confirmed at the time of notification.</p> <p>Action: The non-compliance notification template will be updated to clearly identify where a reason is not known. Timing: Complete.</p>

Schedule, Condition	Independent Audit Finding	Independent Audit Recommendation	Applicant Response (September 2022 update)
4, 12	<p>Non-compliance No. 14 – the following documents were not publicly available on the NESF website at the time of this May 2022 audit:</p> <ul style="list-style-type: none"> – the Response to Submissions dated June 2019; – additional information dated 31 October 2019 and 10 December 2019; – additional information provided to the IPC of NSW on 7 February 2020 and 18 February 2020; – Modification Report dated 16 December 2020; – other Statutory Approvals as listed in Table 3-1 of the EMS; – the Construction Environmental Management Plan and Appendices (CEMP) as committed to in the EIS and section 1.2.2 of the CEMP. 	<p>Recommendation No. 14 – UPC should ensure that all documents as required by Schedule 4, condition 12 and other plans as committed to in the EIS, are publicly available on the NESF website.</p>	<p>Action: The Response to Submissions, additional information documents and Modification Report will be made publicly available on the NESF website. Timing: Complete.</p> <p>It is UPC/VAC and GLC's preference that the CEMP and some other statutory approvals are not uploaded to the NESF website as they contain commercially sensitive information. Based on a review of other state significant solar farm websites, it does not appear to be an industry standard to upload these documents publicly. It is proposed to consult with DPE regarding this issue and potentially develop a construction compliance report or similar.</p> <p>Action: DPE will be consulted regarding making the CEMP and some statutory approvals publicly available. Timing 1 month.</p> <p>ACEN Australia, GLC and DPE held a meeting on 2 September 2022 to discuss non-compliance 14. As an outcome of the meeting, DPE requested further information regarding publicly available documentation on the NESF website, and other approvals sought to date. ACEN Australia provided a response to DPE on 16 September 2022 and is awaiting feedback from DPE.</p> <p>Action: ACEN Australia and GLC will continue to consult with DPE regarding this matter as required. Timing: Ongoing.</p>

Table 2 Independent Environmental Audit – Management Plan Outcomes

Schedule, Condition	Management Plan	IEA Review Outcomes
2, 10	Subdivision Plan	No changes required.
3, 6	Traffic Management Plan	The TMP has been updated to incorporate: <ul style="list-style-type: none"> Barleyfields Road (south) being shown as a road not to be used on Figures 2-2 and 2-3. Proposed changes to reflect the temporary heavy vehicle increase which is currently being reviewed by USC (TfNSW has advised they are satisfied). Other general updates.
3, 11	Biodiversity Management Plan	The BMP has been updated to incorporate: <ul style="list-style-type: none"> Acknowledgement of credit retirement timing (IEA non-compliance 4). Inclusion of a new Protocol 10 relating to visual screening for N1 now that a request has been received by the landholder (IEA observation 7). Updating references to the BCS with the BCD (IEA observation 11). Other general updates.
3, 19	Aboriginal Heritage Management Plan	The AHMP has been updated to incorporate: <ul style="list-style-type: none"> Passive management of NE13 given it is outside the development footprint and will not be impacted by the NESF (IEA observation 15). Other general updates.
3, 19	Historic Heritage Management Plan	The HHMP has been updated to incorporate: <ul style="list-style-type: none"> Consultation material from NSW Heritage Council stating that review of the HHMP is not required, given that the Project will not impact State Heritage Register items or historical archaeological relics/sites (IEA non-compliance 6). Other general updates.
3, 23	Fire Safety Study	Not triggered.
3, 26	Emergency Plan	Not triggered.
3, 28	Accommodation and Employment Strategy	The AES has been updated to incorporate the IEA non-compliance 10 recommendation and other updates, including: <ul style="list-style-type: none"> A review of the construction schedule and workforce estimate, including updates to Section 3 and Figure 3.1. Consultation with Uralla, Armidale and Tamworth to identify any major festivals or annual events in the region that could potentially pressure local housing facilities (noting that only Tamworth has provided feedback to date). Notwithstanding, Table 5.1 has been updated based on a review of council event webpages. Consultation with medical facilities in the region (noting that no responses have been obtained to date since correspondence in July 2022). Other general updates.
3, 29	Decommissioning & Rehabilitation Plan	Not triggered.
4, 1	Environmental Management Strategy	The EMS has been updated to incorporate: <ul style="list-style-type: none"> Inclusion of the SWMP as an internal management plan on Figure 2-2 (IEA observation 20). References where relevant to UGL, the contractor developing the TransGrid switchyard (IEA observation 28). Updates where relevant to the statutory approvals table (Table 3-1) (IEA observation 29). Updates to current roles and responsibilities (IEA observation 30). Inclusion of a figure showing the EMS framework and associated sub-plans (IEA observation 33). Other general updates.
4, 5	Final Layout Plans	No changes required.

