

**Iwan Davies**

Director, Energy Assessments

NSW Department of Planning, Housing & Infrastructure (DPHI)

17 July 2024

**Subject: Independent Environmental Audit**

Dear Iwan,

I am writing in relation to Schedule 4 Conditions 11 and 15 (Independent Environmental Audit) of the Culcairn Solar Farm Development Consent (SSD 10288 – granted on 25 March 2021, and as modified on 22 December 2023), which states that:

11. Independent Audits of the development must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements (2020)* to the following frequency:
  - (a) within 3 months of commencing construction; and
  - (b) within 3 months of commencement of operations.
  
15. 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 Approvals Requirements (2020)* unless otherwise agreed by the Planning Secretary.

This letter relates to the audit report and the Applicant's response to the audit findings which must be submitted within two months of undertaking the audit.

Please find attached the Independent DPHI Compliance Audit SSD-10288 – Culcairn Solar Farm for the audit held on 21 May 2024, prepared by Trigalana Environment Pty Ltd. Please also find Attachment 1 the Summary of audit findings and Attachment 2 the table outlining responses to the audit findings.

Please do let me know if you would like to discuss further.

Kind regards



Benjamin Benfredj

**Construction Project Manager**

**Neoen Australia**

**NEOEN AUSTRALIA PTY. LTD.**

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**Attachment 1:** Findings of the audit sourced from section Executive Summary of Independent Audit

Trigalana Environmental Pty Ltd has been engaged to undertake an independent audit of Culcairn Solar Farm, project (the Project) a 350 Megawatt (MW) alternating current (AC) / 440 MWp direct current (DC), photovoltaic (PV) solar farm, located on rural land, approximately 4 kilometres (km) southwest of Culcairn, New South Wales (NSW).

Neoen Australia Pty Ltd are the Applicant, Bouygues Construction Australia (BYCA) and Equans Solar & Storage are the Construction Contractor.

Infrastructure Approval (SSD-10288) was granted on the 25 March 2021.

SSD-10288 covers both the construction and operational phases of the Project and requires independent audits to be undertaken in accordance with the Department of Planning, Housing and Infrastructures (DPHI) Independent Post Approval Requirements (2020).

The Audit covers the pre-construction, site establishment and early construction activities for the period from the commencement of construction until the 21st of May 2024. The Audit included a site inspection, consultation with relevant project stakeholders and a review of management plans, project documents and site-records.

The findings of the Audit are:

- Preconstruction obligations as required by the Infrastructure Approval have been completed.
- Key environmental issues are being managed effectively with key mitigations summarized below:
  - Erosion, sediment, and dust controls consisting of stabilised site access, sealed internal roads street sweeper and water cart for dust suppression.
  - Limits of disturbance, endangered ecological communities and habitat trees were clearly marked in the field to prevent unauthorised clearing.
  - Nest boxes had been installed prior to the commencement of clearing activities.
  - Site entrance, road upgrade and traffic signage has been installed.
- Preconstruction obligations have been fulfilled including:
  - DPHI approval for construction phase environmental management plans.
  - Retirement of Biodiversity Credits.
  - Salvage of aboriginal heritage items.
  - Execution of Voluntary Planning Agreement with Greater Hume Shire Council.
- Four complaints have been received to date.

No non compliances are identified by the audit, six recommendations are made aimed at strengthening existing environmental management processes and are documented in this report.

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Attachment 2: table outlining Applicant's responses to audit findings

Ref	Condition	Audit Finding	Recommendation	Applicant Response
Sch 03-08	Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW, Council and Hurricane Hill Quarry, and to the satisfaction of the Planning Secretary. This plan must include	The Traffic Management Plan (TMP) was conditionally approved by DPHI on the 22/1/24 noting the TMP must be updated: <ul style="list-style-type: none"> <li>• Following consultation with Transport for NSW and Greater Hume Shire Council regarding the use heavy vehicles requiring an escort and prior to the use of heavy vehicles requiring an escort, as described in Condition 2 of Schedule 3;</li> <li>• Prior to carrying out any upgrading or decommissioning on site to detail the extent and scope of the pre and post upgrading or decommissioning phase dilapidation surveys; and</li> <li>• As required in accordance with the Development Consent.</li> </ul>	Update the Plan as required by DPHI and as noted.	The Applicant will update the Plan as required.
Sch 3-17	The Applicant must: <ul style="list-style-type: none"> <li>a) Minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version; and</li> <li>b) Ensure that the noise generated by the operation of the battery storage facility during the night does not exceed 35dB(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.</li> </ul>	Although the Project is in a low densely populated area and appropriate measures have been implemented to reduce noise impacts, the next phase of work will involve some impact piling for the foundations for the solar panels which will result in impulsive and tonal noise and may become a nuisance for nearby residents.	It is recommended the neighbours who are impacted by the work are consulted with directly so if there are any concerns they may have, then the timing of impact piling may be adjusted with appropriate respite times applied to minimise impacts. This may include the preparation of a "hotspot map".	The Applicant regularly informs and will keep informing the neighbours of the ongoing works.
Sch 3-18	The Applicant must minimise the dust generated by the development.	Appropriate measures to minimise dust include: <ul style="list-style-type: none"> <li>• Stabilised site access</li> <li>• Hardstand laydown areas</li> <li>• Rumble grid and vehicle washdown</li> <li>• Water carts</li> <li>• Speed restrictions on internal access roads</li> </ul> <p>It was noted that in some areas on site where the soil was a powdery "bulldust" material with greater potential to create nuisance where activities are occurring closer to the nearest residents.</p>	Develop a "hot spot" map of high-risk areas for dust generation (i.e. closest to residents/fine material) and prioritise mitigation in these areas), this may include the use of dust suppression sprays.	The Applicant has built and has put in place: <ul style="list-style-type: none"> <li>• Stabilised site access</li> <li>• Harstand laydown areas</li> <li>• Rumble grid and vehicle washdown station</li> <li>• Water carts circulating on the site</li> <li>• Speed restrictions on internal access roads.</li> </ul> <p>The Applicant will keep these measures in place and apply dust suppression measures whenever necessary.</p>
Sch 3-24	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/ or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.	Water is supplied by Greater Hume Council, accessed from standpipes and supplied to the Project under a subcontractor agreement.	Undertake an internal subcontractor audit to ensure water is being sourced in accordance with the Water Access License.	The Applicant agrees with the recommendation.
Sch 3-28	Prior to commencing construction, unless the Planning Secretary agrees otherwise, the Applicant must prepare a Safety Management Study for the development, in consultation with the owner of the gas pipeline. The study must include an assessment of potential electrical hazards and must be consistent with the Australian Standard 2885 for Pipelines – Gas and Liquid Petroleum and Australian Standard 4853-2012 – Electrical Hazards on Metallic Pipelines. Following completion of the Study, the Applicant must implement the measures described in the Safety Management Study.	The DPHI approved the Safety Management Study on 13/12/23 and noted "the electrical hazard study required under Australian Standard 4853-2012-Electrical Hazards on Metallic Pipelines is unable to be completed until the earthing designs are finalised.  Accordingly, the DPHI requests Neoen submit a revised Safety Management Study which includes the electrical hazard study (prepared in accordance with AS 4853-2012) prior to commencing the construction and installation of electrical equipment within the gas pipeline easement"	In accordance with the DPHI letter of approval, the safety management system is to be revised and resubmitted to DPHI prior to commencing the construction and installation of electrical equipment within the gas pipeline easement. This work had not commenced at the time of the Audit site inspection.	The Applicant has selected Zero Sequence Earthing and is proceeding to the electrical hazard study for the Safety management Study. Once completed, the Applicant will submit the study to APA and to DPHI.
Sch 3-30	The Applicant must; <ul style="list-style-type: none"> <li>a) Minimise the fire risks of the development, including managing vegetation fuel loads on site</li> <li>b) Ensure that the development;</li> <li>c) .....</li> </ul> <p>Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.</p>	The Project is in a high-risk area for bushfire zone. Although summer is 5 months away, there is a need to ensure the Project is fully equipped to prevent and respond to any fire related incidents.	Conduct a pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. It is recommended the review should focus on the activities noted in the Bushfire Management including (but not limited to): <ul style="list-style-type: none"> <li>• Onsite Preparedness Activities</li> <li>• Firefighting water supplies and equipment</li> <li>• Access and egress for emergency vehicles</li> <li>• Emergency Response</li> <li>• Communication Protocols</li> </ul> <p>Involve suitably qualified personnel in the review as required. A record of the review should be kept.</p>	The Applicant agrees with the recommendation.