

Crookwell 3 Wind Farm

Independent Environmental Audit

Prepared for Crookwell 3 Development Pty Ltd

November 2023

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Independent Environmental Audit

Crookwell 3 Development Pty Ltd

E230399 RP#1

November 2023

Version	Date	Prepared by	Approved by	Comments
0.1	08/10/23	Wendy Mason/David Bone	David Bone	Draft for review
1.0	6/11/23	Wendy Mason/David Bone	David Bone	Final

Approved by



David Bone

Independent Auditor

6 November 2023

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This report has been prepared in accordance with the brief provided by Crookwell 3 Development Pty Ltd and has relied upon the information collected at the time and under the conditions specified in the report. All findings, conclusions or recommendations contained in the report are based on the aforementioned circumstances. The report is for the use of Crookwell 3 Development Pty Ltd and no responsibility will be taken for its use by other parties. Crookwell 3 Development Pty Ltd may, at its discretion, use the report to inform regulators and the public.

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Independent Audit Declaration

Project name	Crookwell 3 Wind Farm
Consent number	SSD 6695
Description of project	Construction and operation of a wind farm
Project address	Woodhouseslee and Greywood Siding Roads, Upper Lachlan
Proponent	Crookwell Developments Pty Ltd
Title of audit	Independent Environmental Audit
Date	29 May 2023
<p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> the audit has been undertaken in accordance with relevant approval condition(s) of consent and in accordance with the <i>Independent Audit Post Approval Requirements</i> (Department 2020); the findings of the audit are reported truthfully, accurately and completely; I have exercised due diligence and professional judgement in conducting the audit; I have acted professionally, objectively and in an unbiased manner; I am not related to any proponent, owner or operator of the project neither as employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent or child; I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent or child; neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the Department prior to the audit; and I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <p>Note:</p> <p>a) Under section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and</p> <p>b) The <i>Crimes Act 1900</i> contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).</p>	
Name of proposed auditor	David Bone
Signature	
Qualification	ADAS Resources Management 1986; CENvP Environmental Auditor #137
Company	EMM Consulting Pty Limited
Company address	Level 3, 175 Scott Street, Newcastle, NSW 2300

Executive Summary

EMM Consulting (EMM) was engaged by Crookwell 3 Development Pty Ltd to undertake an independent environmental audit (IEA) of the Crookwell 3 Wind Farm. The State Significant Development (SSD) 6695 was approved by the L&E Court Determination on 14 Oct 2020.

The Crookwell 3 wind farm (the project) is considered the 2nd stage of the Crookwell 2 wind farm, (also owned and operated by GPG Australia) included the construction of an additional 16 wind turbines within Upper Lachlan Shire Council.

The audit period was October 2020 to June 2023. This was the first IEA for the project under the approval.

At the time the IEA was completed internal access roads, bulk earth works and the construction of wind turbine footings were well under way.

Two areas of noncompliance were identified as a result of this IEA, administrative non compliances that can be addressed include:

- C11 - The IEA was not undertaken within 6mth of commencement of construction, ambiguity between notification of minor works and commencement of construction date lead to a late trigger of the IEA requirement. (Next audit to be undertaken with 3yrs as per as per the C11 requirement)
- C12 – Public access to information. The project website did not contain all the relevant information as stated in the condition C12. (To be corrected within 3mth)

The findings of this audit are that the construction of the project is considered generally compliant with the SSD - 6695 conditions. The management and associated environmental programs in place were found to be adequate and in scope and applied in practice by Crookwell 3 Development Pty Ltd for the stage of the project.

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1 Introduction

1.1 Background

EMM Consulting (EMM) was engaged by Crookwell 3 Development Pty Ltd to undertake an environmental independent audit (IEA) of the Crookwell 3 Wind Farm against the conditions of approval as required by Conditions C11 Schedule 4 of the State Significant Development (SSD) 6695 – approved by the L&E Court Determination on 14 Oct 2020.

The Crookwell 3 wind farm (the project) is considered the 2nd stage of the Crookwell 2 wind farm and would include the construction of an additional 16 wind turbines, that would link into the already operating Crookwell 2 wind farm. The project located in the Upper Lachlan Shire Council area covers approximately 1,100 ha owned by two landholders and primarily used for agricultural (grazing) activities which will continue with the operation of the wind farm.

In accordance with Condition 5 Schedule 4 of SSD 6695 the proponent notified the Department of Environment (DPE) in writing of the proposed construction commencement date to be 19 September 2022. The notification list the works that were to commence on that date included the construction of external access points (interface of Woodhouselee Road and Graywood Siding Road) and the first 120m of Graywood Siding Road (all of which may fall under the definition of Pre-construction minor works), notwithstanding there is some ambiguity as to what is considered the initial construction commencement date. The IEA was deemed to have not occurred within the 6mth time frame from the advised start date (due 19 March 2023) as stated by condition C11.

David Bone was in the Upper Lachlan Shire in early June 2023, to avoid any further delays (non-compliances) an initial audit meeting and site inspection was completed on the 06 June 2023, pre-empting DPE approval of the auditor. Mr David Bone of EMM Consulting (EMM) was subsequently approved by the department to be the lead auditor on 28 July 2023. DPE letter of approval can be found in Appendix A.

The audit period covered by this IEA is 19 September 2022 to 07 June 2023 and assesses the management plans and their implementation during the initial establishment and construction phases of the project.

1.2 Audit Team

The audit was conducted by EMM, approved lead auditor Mr David Bone. David has signed the independent audit declaration as seen above and was assisted by the administrative staff in the compilation of this report.

1.3 Audit objectives

The key objective of the IEA is to determine the project's compliance with SSD-6695 conditions relevant to the construction phase of the project. The independent audit requirements under SSD-6695 are detailed in the following subsections.

The IEA also determine compliance with the requirements of the project's supporting documentation including management plans and environmental monitoring associated with this stage of the project.

Finally, the IEA assesses the overall effectiveness of environmental management at the project through the site-based component of the audit.

1.4 Audit scope

The audit assesses project compliance with conditions as set out by SSD-6695, targeting the early construction of enabling works such as roads and the construction of wind turbine footings for this phase of the project. The conditions of consent which will be assessed as part of this audit are the following:

- Schedule 1 – Refusal of Development application (not assessed as part of this IEA)
- Schedule 2 Administrative Conditions A1 – A15.
- Schedule 3 Environmental Conditions B1 – B45; and
- Schedule 4 Environmental Management, Reporting and Auditing Conditions C1- C12

The audit also included assessment of post approval and compliance documentation prepared to satisfy the conditions of consent including the implementation of the Environmental Management Strategy (and associated sub-plans).

The audit reviewed the environmental performance of the project via assessment of;

- Actual impacts compared to predicted impacts documented in the environmental impact assessment
- 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
- The performance of the project having regard to agency policy and environmental issues identified through consultation carried out during the audit scope
- Feedback received by the project team 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

The 2023 IEA assessed the environmental performance and compliance status of the project from the L&E Court Determination 19 September 2022 to 07 June 2023.

2 Audit methodology

The IEA was undertaken in accordance with the requirements as set out by Section 3 of *Independent Audit Post Approval Requirements* (NSW Department of Planning, Industry and Environment (DPE), 2020), and following ISO 19011 audit requirements where relevant.

The audit scope was developed by the lead auditor, Mr. David Bone and included review of the project approval and all documentation relevant to the operation of the project.

2.1 Selection and endorsement of audit team

The auditor(s) must be endorsed by the Secretary of the Department of Planning and Environment (DPE) prior to conducting the audit. As such, the audit teams qualifications, and a statement on their independence from the site were submitted to DPE and approval was obtained.

DPE Secretary approval of the audit team of Mr David Bone (Lead Auditor) was received on 28 July 2023. The endorsement letter is contained in Appendix A.

2.2 Independent Audit Scope development

The independent and endorsed audit team have developed the scope of this IEA in accordance with the NSW Independent Audit - Post approval requirements, the conditions of approval as approved by the NSW Minister for Planning and Environment have been listed in Appendix D and are used as the basis for this audit.

2.3 Compliance evaluation

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

2.4 Site interviews

Conditions of consent are listed and reviewed prior to the site audit to ensure as much information as possible could be reviewed to gain a greater understanding of the key elements of the project before arriving on site. Site interviews are completed to ensure that the project staff are aware of their requirements on site.

Interviews were held on site as part of the audit and included the following staff:

- GPG Project Manager – Aflonso Monedero Ilorente
- GPG Senior Project Engineer – Guillermo Alonso Castro
- GPG HSE Advisor – Daniel Cullen
- GPG HSE Site Supervisor – James Brighton
- Divall’s Environmental Representative – Cassio Costa

Discussion points raised were:

- Project overview
- Update on construction to date
- Audits and weekly inspections conducted to date.

- Complaints and incidents during the audit period.

2.5 Site inspections

- A site inspection was undertaken on the 6 June 2023, David Bone was escorted by project representatives. Those involved in the audit process comprised of:
 - GPG – Project Manager (CW#3) Alfonso Mondedero Ilorente
 - Divalls Environmental Representative – Cassio Costa
 - GPG HSE Site Supervisor – James Brighton
 - GPG HSE Advisor – Daniel Cullen

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

2.6 Consultation

Crookwell 3 is considered a separate project which is a second stage of the Crookwell 2 Wind Farm; the project adds another 16 wind turbines to the already operational plant. As such Condition 4 of Schedule 4 of the SSD 6695 allows for the Community Consultation Committee (CCC) process to be undertaken conjointly with Crookwell 2.

During the CCC relevant agencies and stakeholders can raise any concerns in relation to the projects in a hope that they can be addressed as soon as possible. Presentation and minutes for the CCC have been reviewed as part of this IEA process. NSW Department of Planning and Environment and Upper Lachlan Shire Council have been consulted as part of this IEA process.

Consultation undertaken is listed in Appendix C. At the time that the audit report was completed no major concerns were raised with respect to Crookwell 3, project.

2.7 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 *Independent Audit Post Approval Requirements* (NSW Department of Planning, Industry and Environment (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; and
- **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 and the operational performance and effectiveness of environmental management measures implemented during the audit period:

- Crookwell 3 Environmental Impact Statement, prepared by Tract Consultants Pty Ltd
- Crookwell 3 Addendum Environmental Impact Statement, prepared by Mecone
- L&E Court Determination outcome dated 14 Oct 202, SSD-6695 Development Consent (conditions listed)
- ERM 2021, Crookwell 3 Wind Farm Environmental Management Strategy, V2
- Crookwell 3 Biodiversity Development Assessment Report – 5 April 2022
- Crookwell 3 Traffic Management Plan (TMP) 07/04/22
- Crookwell 3 Bushfire Emergency Management Plan 07/07/21
- Crookwell 3 Heritage Management Plan 07/07/21
- Crookwell 3 Stormwater Management Plan - 09/21
- 2022-01-31-Crookwell-3-Dwellings-Plan_RevB.pdf - WT locations
- 0151-0454_V00 21-0040 TOD V126 Mk3B HH94 - Crookwell 3 Project Drawing
- Crookwell 3 AWEFS Energy Conversion Model Guidelines (1)
- Site Induction – 6 June 2023
- 20230224 CR3WF Formal Complaints Register
- Woodhouselee Rd Dilap Report - undertaken 12/22 after road repair by Devall's (repaired 11/22)
- VPA between The Upper Lachlan Shire Council and Crookwell Development Pty Ltd for the Crookwell 2 Wind Farm and Crookwell 3 Wind Farm
- Executed agreement between adjoining property landowner (name withheld) and the project dated 15 August 2022 was sited during the inspection
- Notification of commencement to DPE – dated 19 September 2022
- 100406-01_Crookwell_3_WF_AIA_Addendum_v1.0_210713 - Design drawings
- Shadow Flicker Assessment letter - dated 24 Feb 2016 (DNV GL),
- <https://crookwellthreewindfarm.globalpower-generation.com.au>
- Crookwell 3 – Associated registers and documentation sited – listed in Appendix D.

3.2 Compliance performance

SSD 6695 Conditions of Approval lists 72 items against which the project has been audited. All conditions have been listed in Appendix D, and comprise of the following:

- 72 conditions, a total of 50 were determined to be triggered for this audit cycle. The remainder of the conditions were not triggered for this stage of the project or simply were not triggered (i.e no blasting required)
- Of the 50 conditions triggered for this audit, the majority were compliant only two conditions were found to be non-compliant.

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

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

3.4 Previous audit findings and recommendations

This is the first independent environmental audit, therefore no previous audit finding are to be listed.

3.5 EMS, Sub-plans and compliance documents

The Environmental Management Strategy (EMS) and sub plans have been developed in accordance with the conditions of consent. All plans have been approved by DPE, approval letters can be found on the Major Projects Portal.

Documents reviewed in relation to the project are listed in Section 3.1 and contained within the compliance table in Appendix D. The site inspection noted the following in relation to compliance:

- Signage clearly displayed at the entry to the site.
- Site parking was fully contained within the project boundaries
- Traffic routes were clearly identified in the site induction as well as at site gates and in offices and crib rooms
- The site induction contains key requirements of the approved plans and CoA.
- Waste tracking was reviewed in monthly reports provided showing compliance with the requirements of the CoA and approved plans
- Waste separation is occurring on site and all wastes were appropriately stored
- Site access tracks had been clearly delineated and erosion and sediment control were in place and regularly monitored through weekly inspections
- Clear delineation of construction areas meant that the construction footprint was limited the construction footprint.
- Well designed and constructed sediment basins ensures that the site had adequate water for dust suppression.

3.6 Environmental performance

The project was in general compliance with conditions that have been triggered for this stage of the project. The site was well organised, site personnel were aware of the environmental requirements under the conditions of consent and how they related to their role on the project.

The IEA revealed administrative non compliances, the main one relating to the construction commenced date of the project. Ambiguity, may have arisen as to what is considered minor works and the commencement of construction following construction of the access road as early enabling works, resulting in the project team not initiating the IEA within 6mth of the commencement of 'construction' date.

Administrative noncompliance also related the access of information and what was made publicly available through the project web site. CCC meeting minutes were provided upon request, other documentation needs to be made available and updated on the project website to fully comply with Condition C12.

3.7 Consultation outcomes

The project consultation is captured in CCC meetings (undertaken in conjunction with Crookwell 2 Wind farm – SSD 6695 C4). CCC Meeting minutes found on the project web site list concerns raised and how they have been addressed by the project. There are no outstanding concerns. DPE approved this IEA, Upper Lachlan Shire Council was made aware of the IEA and did not raise any concerns with relation to the project.

3.8 Complaints

Complaints that have been received as of September 2023

- 14/11/22 – Condition of the Woodhouselee Rd (improvement work not undertaken in the Upper Lachlan Shire Area) Divalls engaged by the proponent to ensure that the condition of the road was improved. Dilapidation reports.
- 10/12/22 - Dust Management of Graywood Siding Rd. Discussion with Divalls undertaken to ensure that dust management was addressed immediately.
- 07/12/22 – Access gate blocked by skip bin. Management removed the skip bin to ensure access.
- 06/12/22 – Local resident raised concern regarding removal of a tree. Ecology Consulting - approved letter that was sent to the local resident to close out the matter. No further concern raised - matter closed.
- 08/02/23 – Local resident raised concern regarding the access gate and drainage, consultation was undertaken on site and solution actioned.

No further complaints received. All complaints and enquiries have been closed out and adequately addressed.

3.9 Incidents

No environmental incident report was lodged during the audit period.

3.10 Actual verses predicted environmental impacts

The project initially included the construction of 23 wind turbines, this number was reduced after reports identified wind turbines in the incorrect locations. Wind turbines had to be removed as they were predicted to exceed shadow flicker requirements as listed in B17. Sixteen wind turbines were finally approved by the land court's decision SSD 6695 - L&E Court Determination on the 14 Oct 2020.

Several locations of wind turbines were carefully reconsidered to allow better access tracks to be constructed and to reduce the amount of clearing required by the project. Clearing works were the predominate impact assessable at the time of the audit. The clearing limits were noted to be within approved boundaries in all areas.

The site was being managed in accordance with environmental management plans that have been developed to mitigate environmental impacts. At this stage of the project is compliant with predicted impacts.

Noise levels across the project showed general compliance with noise management levels during construction.

One dust complaint received and addressed with the contractor immediately.

No complaints in relation to noise or vibration have been received by the project.

At this phase of the project no over dimensional equipment has been delivered, permits are in place for larger wind turbine equipment to arrive.

3.11 Site interviews

All site personnel were aware of their environmental requirements for their roles on site. Personnel interviewed during the audit are detailed in Section 2.4 and 2.5.

3.12 Site Inspection

David Bone was in the Upper Lachlan Shire early June and was contacted with regarding to undertaking the IEA. Due to availability and to avoid delays (non-compliances) the initial audit meeting and site inspection was completed on the 06 June 2023, (pre-empting DPE approval).

The site inspection of the active areas included driving access tracks to wind turbines, an inspection of the sediment ponds, laydown areas and an inspection of a concrete pour of a wind turbine footing. Site inspection also addressed the access gate, surrounding perimeter fencing and signage and clearly delineating 'No Go' zones. Photographs taken during the site inspection are contained within Appendix C.

3.13 Previous Annual Review or Compliance Report recommendations

This was the first audit IEA for the project, no other compliance reports or annual reviews have been considered.

3.14 Key strengths

The project team was well organised and were aware of their requirements on site. All records were well organised and readily available upon request.

The systems in use were well managed and the requirements of the approval and EIS mitigation measures were well understood by the GPG and Contract (Divall's) teams.

Key aspects relating to protection of heritage and sensitive vegetation were well managed by the team leading to a reduction in clearing and impacts to heritage items.

4 Recommendations

4.1 Non-compliances

Two areas of noncompliance were identified as part of the IEA process.

- C11 - The IEA was not undertaken within 6mth of commencement of construction, ambiguity between notification of minor works - building access roads and commencement of construction caused confusion delaying the IEA. RECOMMEND: Ensure that the project undertakes the 3yr IEA within the required time frame.
- C12 – Public access to information through the project website. Information was provided in a clear and concise manner. Not all documentation listed in the C12 was available. (EIS not available, CCC presentations provided (only up to August) Minutes provided and updated on the website (because of RFI and in compliance with CoC C3) Complaints register absent from project website - sited during IEA. RECOMMEND: Suggest providing a link to the Major Project Portal - all current documentation can be accessed. Complaints register to be made available on the website, with last date uploaded. Annual Statement of compliance should be made available as stated in C12.

4.2 Opportunities for improvement

The following observations and opportunities for improvement were identified during the audit. The recommendations from the audit include administrative correction that include:

- Ensure that noise impacts from EPC contractor are assessed against Sch 3.13 to ensure they are compliant where differing equipment or locations are required
- Ensure a review of the systems in use by the EPC contractor occurs to ensure a transfer of knowledge between the BOP and EPC contractors occurs. This is suggested to ensure the compliance systems in use currently are maintained or other systems are in place for this phase of the project.

5 Conclusion

The project site was well organised, staff were aware of the environmental requirements on site. The site inspection was completed on 06 June 2023 with office based interviews and record reviews occurring on 07 June 2023 (pre-empting DPE IEA approval) the project has a high level of compliance with the conditions of approval and management plans. Additional RFI's were addressed in August and September 2023.

The site was well maintained and organised with clear access tracks, clear delineation of areas that could not be accessed by the construction team (heritage no-go areas and biodiversity no-go areas) and clear signage installed around the project. Sedimentation ponds were well constructed, with the water used for dust suppression or recycled where possible at the concrete batch plant for washdown and dust suppression on stockpiles.

The project team have a very high level of understanding of the requirements of the consent and approved management plans which they have fully implemented on site.

Registers, site inspections and weekly inspections were all maintained and in well organised manner all documentation was supplied upon request.

Two administrative areas were identified as non-compliant:

- Condition C11 IEA not completed within time frame stipulated.
- Condition C12 Public access to information

The above two administrative non compliances can be simply corrected to ensure that ongoing compliance is maintained. Refer to Appendix E – noncompliance register for actions required.

Appendix A

NSW Department of Planning and Environment
Secretary's Endorsement

Guillermo Alonso
GPG
Naturgy Group
Suite A, Level 3,
73 Northbourne Avenue
Canberra, ACT 2601

28/07/2023

SSD6695-Crookwell 3 Wind Farm

Independent Environmental Audit – Audit team approval

I refer to your request (SSD6695-PA-21) for the Secretary's approval of suitably qualified person to undertake the Independent Environmental (IEA) Audit and prepare the IEA Report for the Crookwell 3 Wind Farm (SSD-6695).

The department has reviewed the nominations and information you have provided and is satisfied that this expert is suitably qualified and experienced. In accordance with Schedule 4 Condition 11 of SSD-6695 and the Independent Audit Post Approval Requirements, the Secretary has agreed to Mr David Bone of EMM Consulting Pty Limited to undertake the IEA and prepare the IEA report. This approval is conditional of the Mr Bone maintaining independence from the project and holding a current Exemplar Global or equivalent certification.

Please ensure this correspondence is appended to the Independent Audit Report. The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary.

Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered. If you wish to discuss the matter further, please contact Michael Wood on 0459890661.

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix B

Consultation Register

B.1 Consultation Register

Table B.1 Agency and stakeholder consultation records

Agency/Stakeholder	Type of consultation	Comments
Upper Lachlan Shire Council	Local Government emailed	Nil
Department of Planning and Environment	Approval of Lead auditor	Approval received 28/07/23
Crookwell 2 and 3 Community Consultation Committee	Community consultation	Minutes reviewed
Crookwell 3 - Complaints register	Register reviewed	Register reviewed and asked to be provided on website.

To whom it may concern,

EMM Consulting Pty Limited (EMM) has been engaged by Crookwell 3 Pty Ltd to undertake an independent environmental audit (IEA) of the Crookwell 3 Wind Farm. The Crookwell 3 Wind Farm is an approved 16 turbine wind farm project planned for construction in the NSW Southern Tablelands approximately 17km south-east of Crookwell township, 25km north-west of Goulburn, and 90km north-east of Canberra, within the Upper Lachlan Shire Council Local Government Area. Laying adjacent to the already operational Crookwell 2 Wind Farm.

In accordance with the Independent Audit: Post Approval Requirements (NSW Department of Planning Industry and Environment 2020) the IEA will include an assessment of compliance with SSD-6695 conditions of consent, post approval management plans and an assessment of environmental performance on the site.

EMM's lead auditor Mr David Bone has been approved by the Department of Planning Industry and Environment (DPIE). Key stakeholders are contacted to obtain feedback on the project and provide them an opportunity to raise any matters they may wish reviewed in relation to operational aspects of the project.

Please feel free to contact or email me with any matters you wish to raise, they will be included in the IEA. All matters raised will be documented as part of the audit process and responses included in the audit report submitted to DPIE. Should you have any questions, please do not hesitate to contact me.

Regards

Appendix C

Photographs

Site inspections – photographs taken on the 6 June 2023



Photograph 1 – Project Signage



Photograph 2 – Access to the site – Roads well established and stable.



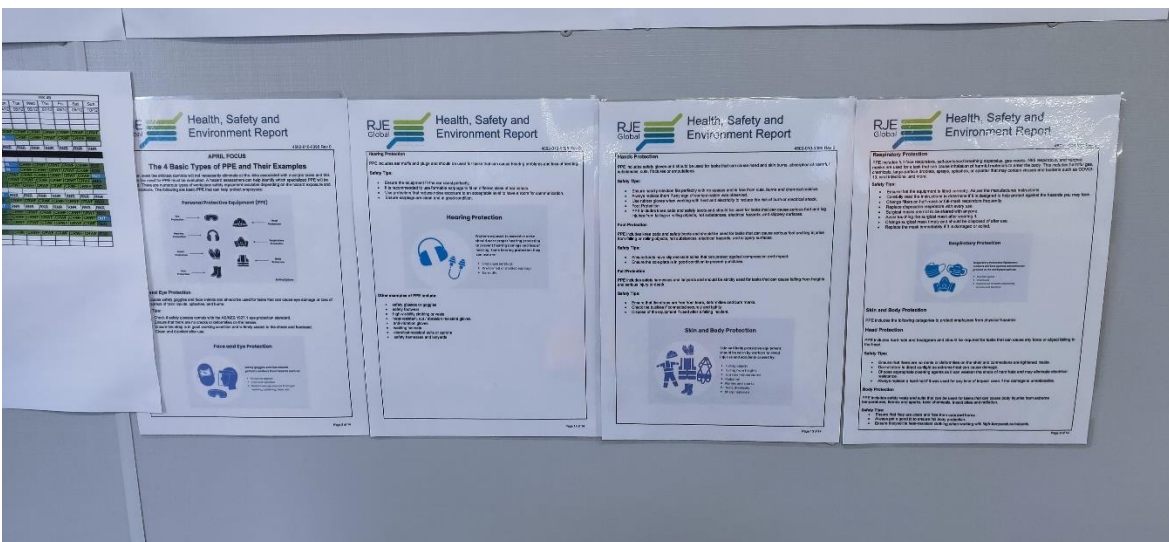
Photograph 3 – 'No Go' Zone delineated



Photograph 4 – Footing of a completed Wind Turbine and pad area



Photograph 5 – Restricted areas fenced and signposted, to prevent further clearing.



Photograph 6 – Environmental notice board



Photograph 7 – Waste segregation area



Photograph 8 – Chemicals correctly stored in self bunded tanks and with spill prevention



Photograph 9 – Laydown yard clearly delineated and site generator is self bunded



Photograph 10 - Sediment basin at concrete batch plant



Photograph 11 - Pouring the footings for Wind Turbine



Photograph 12 - Concrete pour for the footings of a Wind Turbine

Appendix D

Independent Audit Compliance Table

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	SCHEDULE 1 - REFUSAL OF DEVELOPMENT APPLICATION - Independent Planning Commission				
	SCHEDULE 2 - 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 or decommissioning of the development.	Triggered	IEA undertaken by EMM Consulting, site inspection completed by David Bone on the 6 June 2023, evidence collected as stated within this IEA report.	The site was well organised, management have implemented measures to prevent harm to the environment. Construction of the project is in general accordance with the plans and requirements of the approvals and legislation pertinent to the project.	Compliant
	TERMS OF CONSENT				
A2.	The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Triggered	Tract 2012, Crookwell 3 Environmental Impact Statement, prepared by Tract Consultants Pty Ltd on behalf of Crookwell Development Pty Ltd. Mecone 2018, Crookwell 3 Addendum Environmental Impact	Construction of the project is in general accordance with the EIS, plans and requirements of the approvals and legislation pertinent to the project. This IEA assess if the Applicant has carried out the development in accordance with the conditions of consent.	Compliant
A3.	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Triggered	Noted	Noted - SSD 6695 Conditions of consent have been used as the basis of the IEA, any inconsistencies will result in the CoC prevailing.	Compliant
A4.	The Applicant must comply with any reasonable requirement/s of the 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	Major Projects Portal was accessed on the 8 August 2023,	Strategies and plans have been provided to address all conditions of consent The Departments comments have been reviewed and documentation approved before construction commenced.	Compliant
	LIMITS OF CONSENT				
	Wind Turbines				
A5.	The Applicant may construct, operate and replace or upgrade as necessary up to 16 wind turbines identified in Appendix 2.	Triggered	2022-01-31-Crookwell-3-Dwellings-Plan_RevB.pdf - WT locations	Plans indicate 16 WT, construction of the footing is under way.	Compliant

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)																		
A6.	This consent does not authorise the development of wind turbine numbers A2, A28, A29, A30, A31, A32, A33. Notes: To identify the wind turbines, see the figure and corresponding GPS coordinates (for those wind turbines approved) in Appendix 2.	Triggered	2022-01-31-Crookwell-3-Dwellings-Plan_RevB.pdf - WT locations	Construction is under way for 16WT footings, the additional WT A2, A28, A29, A30, A31, A32, A33 - have been removed from the construction plans.	Compliant																		
A7.	No wind turbines may be located within 100 metres of the site boundary, unless otherwise agreed by the adjoining landowner.	Triggered	2022-01-31-Crookwell-3-Dwellings-Plan_RevB.pdf - WT locations	Plans indicate that all WT are 100 m from boundary, once constructed correct sittings will be undertaken to confirm location of each WT.	Compliant																		
Upgrading of Wind Turbines and Ancillary Infrastructure																							
A8.	The Applicant may replace or upgrade the wind turbines provided these upgrades remain within the approved development footprint of the site and would not result in any non-compliance with the conditions of this consent. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.	Not Triggered		The Applicant will provide revised layout plans and project details of the development to the Secretary prior to making any changes to the project.	Not Triggered																		
Wind Turbine Height																							
A9.	No wind turbines may be greater than 157 metres in height (measured from ground level to the blade tip).	Triggered	0151-0454_V00 21-0040 TOD V126 Mk3B HH94 - Crookwell 3 Project Drawing	Drawing sited during the inspection - confirmed that height will be 157 m in height.	Compliant																		
Micro-siting Restrictions																							
A10.	<p>The Applicant may micro-site the wind turbines and ancillary infrastructure, provided:</p> <p>(a) the wind turbines in Table 1 are moved no further than the limitations identified in Table 1; and</p> <p>(b) the revised location of the wind turbine and/or ancillary infrastructure would not result in any noncompliance with the conditions of this consent.</p> <p><i>Table 1: Wind turbine limitations</i></p> <table border="1"> <thead> <tr> <th>Turbine</th> <th>Limitation</th> </tr> </thead> <tbody> <tr> <td>Any approved turbine</td> <td>No wind turbine is moved more than 100 metres from the relevant GPS coordinates shown in Appendix 2.</td> </tr> <tr> <td>A3</td> <td>No closer to residence 69 or 106</td> </tr> <tr> <td>A4, A5</td> <td>No closer to residence 106</td> </tr> <tr> <td>A10</td> <td>No closer to residence 63</td> </tr> <tr> <td>A20</td> <td>No closer to the adjacent woodland</td> </tr> <tr> <td>A22</td> <td>No closer to the adjacent woodland</td> </tr> <tr> <td>A24</td> <td>No closer to residence 62 or the adjacent woodland</td> </tr> <tr> <td>A25</td> <td>No closer to the adjacent woodland</td> </tr> </tbody> </table>	Turbine	Limitation	Any approved turbine	No wind turbine is moved more than 100 metres from the relevant GPS coordinates shown in Appendix 2.	A3	No closer to residence 69 or 106	A4, A5	No closer to residence 106	A10	No closer to residence 63	A20	No closer to the adjacent woodland	A22	No closer to the adjacent woodland	A24	No closer to residence 62 or the adjacent woodland	A25	No closer to the adjacent woodland	Triggered	0151-0454_V00 21-0040 TOD V126 Mk3B HH94 - Crookwell 3 Project Drawing Crookwell 3 AWEFS_Energy_Conversion_Mode L_Guidelines (1)	Drawing sited during the inspection, locations of the WT are within the limitations listed, and do not prove to be a non compliance with any of the conditions of consent.	Compliant
Turbine	Limitation																						
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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
STRUCTURAL ADEQUACY					
A11.	<p>The Applicant must ensure that:</p> <p>(a) the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of IEC 61400-1 Wind turbines – Part 1: Design Requirements (or equivalent); and</p> <p>(b) 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 BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> • 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	Group DLA - GDL210268.1 - CC Stamped Plans - Crookwell 3 Wind Farm, Roslyn REV1 Nov 2021. Stamped by Group DLA (PCA) on 05/01/2022	All construction drawings have been certified by a qualified engineer and approved by the department. Once construction is completed a construction certification will be provided to ensure compliance with this CoC.	Compliant
DEMOLITION					
A12.	The Applicant must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	Not Triggered	No demolition to date for this Stage of the Project.		Not Triggered
PROTECTION OF PUBLIC INFRASTRUCTURE					
A13.	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>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.</p>	Triggered	20230224 CR3WF Formal Complaints Register Woodhouselee Rd Dilap Report -- undertaken 12/22 after road repair by Devall's (repaired 11/22)	Complaint received 14/11/22 - Woodhouselee Rd condition worsened since works commenced, rain and heavy trucks. Divalls engaged to repair works of 700m of the Woodhouselee Rd. Dilapidation report will be issued, the Project will endeavour to repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Compliant
OPERATION OF PLANT AND EQUIPMENT					
A14.	The Applicant must ensure that all plant and equipment used on site, or in connection with the development is: <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	Triggered	Site inspection - 6 June 2023	During the site inspection it was noted that all plant and equipment was being used in a proper and efficient manner. All plant and equipment had been well maintained.	Compliant
COMMUNITY ENHANCEMENT					
A15.	The Applicant shall contribute to Council in accordance with: <p>(a) Division 7.1 of Part 7 of the EP&A Act; and</p> <p>(b) in accordance with the terms of the agreed VPA between The Upper Lachlan Shire Council and Crookwell Development Pty Ltd for the Crookwell 2 Wind Farm and Crookwell 3 Wind Farm, executed on 27 July 2017 as per Council resolution No 222/17.</p>	Not Triggered	VPA between The Upper Lachlan Shire Council and Crookwell Development Pty Ltd for the Crookwell 2 Wind Farm and Crookwell 3 Wind Farm	In accordance with the VPA CR3 contributions do not commence until operation.	Not Triggered

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
PART B	Schedule 3 - ENVIRONMENTAL CONDITIONS - GENERAL				
	VISUAL				
	Visual Impact Mitigation				
B1	<p>For a period of 5 years from the commencement of construction, the owner of any non-associated residence within 4 km of any wind turbine may ask the Applicant to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Applicant must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence. All mitigation measures must be implemented within 12 months of receiving the written request, unless the Secretary agrees otherwise.</p> <p>If the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>Notes:</p> <ul style="list-style-type: none"> To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage. 	Triggered	<p>Site inspection - 6 June 2023</p> <p>Executed agreement between adjoining property land owner (name withheld) and the project dated 15 August 2022 was sited during the inspection</p>	<p>Written agreement sited during the site inspection, Agreement between adjoining land owner and the Project regarding screening - dated 15 August 2022. Screening plants have been planted and now established. 6mth maintenance period expired on Feb 2023. No other issued or concerns raised regarding screening has been received.</p>	Compliant
B2	<p>Prior to the commencement of construction, the Applicant must notify the relevant owners of the residences referred to in condition 1 above, that they have the right to request the Applicant to implement visual impact mitigation measures at their residence (including its curtilage) at any time within 5 years of the commencement</p>	Triggered	<p>Site inspection - 6 June 2023</p> <p>Executed agreement between adjoining property land owner</p>	<p>Prior to the commencement of construction, the Applicant notified the relevant residence which resulted in loaned owner agreements.</p>	Compliant
B3	<p>Once the appropriate mitigation has been agreed, the Applicant may enter into an agreement with the residents of any residence to cover the cost of or supply planting and landscaping material, if the residents intend to undertake the implementation of the mitigation planting themselves.</p>	Triggered	<p>Site inspection - 6 June 2023</p> <p>Executed agreement between property land owner - 20220815-CR3-Landscape screening Deed- (Name redacted) was sited during the inspection</p>	<p>An agreement was signed and completed between residence and the project for residents to cover the cost of or supply planting and landscaping material,</p>	Compliant
B4.	<p>The Applicant is responsible for maintaining the vegetation screening established under condition 1 and 2 (as listed above) of Schedule 3 for a period of 6 months following implementation to ensure it is established.</p>	Triggered	<p>As per CoC B1</p>	<p>The Applicant will provide revised layout plans and project details of the development to the Secretary prior to making any changes to the project.</p>	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Visual Appearance				
B5.	<p>The Applicant must:</p> <p>(a) minimise the off-site visual impacts of the development;</p> <p>(b) ensure the wind turbines are:</p> <ul style="list-style-type: none"> • painted off white/grey, unless otherwise agreed by the Secretary; and • finished with a surface treatment that minimises the potential for glare and reflection; <p>(c) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</p> <p>(d) not mount any advertising signs or logos on wind turbines or ancillary infrastructure.</p> 	Triggered	<p>Site inspection - 6 June 2023</p> <p>Lighting: 100406-01_Crookwell_3_WF_AIA_Addendum_v1.0_210713</p> <p>Paint finishes for ancillary infrastructure as per approved drawings under construction certificates.</p>	<p>No lighting is required for this stage of the project. Design drawings have been provided and approved by the Planning Secretary. The project will ensure that all lighting associated with the project will be kept to a minimum, the project will ensure colours will be white / grey, with a surface treatment that minimised glare. The visual appearance of the ancillary infrastructure (paint) will be muted and blend in with the surroundings. No advertising will be allowed on the side of the structures associated with the Wind Farm.</p>	Compliant
	Lighting				
B6	<p>The Applicant must:</p> <p>(a) minimise the off-site lighting impacts of the development;</p> <p>(b) ensure that any aviation hazard lighting complies with CASA's requirements;</p> <p>(c) ensure that all external lighting associated with the development (apart from any aviation hazard lighting):</p> <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; • uses best management practice for bat deterrence; and • complies with Australian Standard AS 4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	Triggered	<p>Site inspection - 6 June 2023 - 100406-01_Crookwell_3_WF_AIA_Addendum_v1.0_210713 - Design drawings</p>	<p>Design drawings have been provided and approved by the Planning Secretary. The project will ensure that all lighting associated with the project will be kept to a minimum, the project will ensure that all hazard lighting complies with CASA's requirements; Lighting will be installed as low intensity lighting (except where required for safety or emergency purposes);</p> <ul style="list-style-type: none"> • does not shine above the horizontal; • uses best management practice for bat deterrence; and • complies with Australian Standard AS 4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	Compliant
	Shadow Flicker				
B7	<p>The Applicant must ensure that shadow flicker associated with wind turbines does not exceed 30 hours per year at any non-associated residence.</p>	Triggered	<p>Shadow Flicker Assessment letter - dated 24 Feb 2016 (DNV GL), .</p>	<p>The shadow flicker assessment looked at the WT layout plans submitted that included 23 WTs. Three houses had a predicted shadow flicker greater than the limits (within 50m of the house). As a result those WTs causing the flicker greater than the limit were removed from the Project as per CoC A6.</p>	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)												
NOISE																	
Construction & Decommissioning Noise																	
B8	The Applicant must: (a) minimise the construction or decommissioning noise of the development, including any associated traffic noise; and (b) ensure that the noise generated by any construction or decommissioning activities is managed in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.	Triggered	20230224 CR3WF Formal Complaints Register	No noise complaints have been received as a result of construction works on the Project	Compliant												
B9	Unless the Secretary agrees otherwise, the Applicant must only undertake construction or decommissioning activities between: (a) 7.00 am to 6.00 pm Monday to Friday; (b) 8.00 am to 1.00 pm Saturdays; and (c) at no time on Sundays and NSW public holidays. The following construction activities may be undertaken outside these hours without the approval of the Secretary: • the delivery of materials requested by the NSW Police Force or other authorities for safety reasons; or • emergency work to avoid the loss of life, property and/or material harm to the environment.	Triggered	ERM 2021, Crookwell 3 Wind Farm Environmental Management Strategy, prepared by ERM Pty Ltd 20230224 CR3WF Formal Complaints Register Site Inspection - 6 June 2023	Work has been undertaken during these approved hours, no additional noise complaints have been received at the time of the audit. NOTE: Construction hours differ from the Rts, CoC and the EIS - noted that these hours listed here are to prevail. (CoC A3)	Compliant												
Blasting																	
B10	The Applicant must only carry out blasting on site between 9.00 am and 5.00 pm Monday to Friday and between 8.00 am to 1.00 pm on Saturday. No blasting is allowed on Sundays or public holidays.	Not Triggered	Blasting was not required	N/A	Not Triggered												
B11	The Applicant must ensure that any blasting carried out on site does not exceed the criteria in Table 2. Table 2: Blasting criteria	Not Triggered	Blasting was not required	N/A	Not Triggered												
	<table border="1"> <thead> <tr> <th>Location</th> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Ground vibration (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td>Any non-associated residence</td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td></td> <td>115</td> <td>5</td> <td>5% of the total number of blasts or events over a rolling period of 12 months</td> </tr> </tbody> </table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Any non-associated residence	120	10	0%		115	5	5% of the total number of blasts or events over a rolling period of 12 months				
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance														
Any non-associated residence	120	10	0%														
	115	5	5% of the total number of blasts or events over a rolling period of 12 months														

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Operational Noise Criteria – Wind Turbines				
B12	The Applicant must ensure that the noise generated by the operation of wind turbines does not exceed the higher of 35 dB(A) or the existing background noise level (LA90 (10-minute)) plus 5 dB(A)) for each integer wind speed, measured at hub height, from cut-in to rated turbine generator power, at any non-associated residence. Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version). The noise generated by the operation of the wind turbines must also be adjusted for tonality and low frequency noise in accordance with the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version). However, these criteria do not apply if the Applicant has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.	Not Triggered			Not Triggered
	Operational Noise Criteria – Ancillary Infrastructure				
B13	The Applicant must ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (or its equivalent).	Not Triggered			Not Triggered
	Noise Management Plan				
B14	Prior to commissioning of the turbines, the Proponent must prepare a Noise Management Plan to manage noise emissions from the operation of the development, to the satisfaction of the Secretary. The Plan must include: (a) compliance monitoring within 3 months of operations, or the commencement of operation of a cluster of turbines if the development is to be staged, unless the Secretary agrees otherwise, in accordance with the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version) to determine whether the development is complying with the relevant conditions of this consent; (b) description of the parameters and meteorological conditions which trigger the use of noise management mode and sector management; (c) an auditable process that compliance can be independently confirmed for the use of noise management mode and sector management; (d) procedures and corrective actions to be undertaken if non-compliance is detected; (e) provision of a copy of the compliance monitoring results to the Secretary and the EPA. Following the Secretary's approval, the Applicant must implement the measures described in the Noise Management Plan.	Not Triggered		Management is in the process of organising quotes for this work to be completed once required on site.	Not Triggered

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	AIR				
B15	The Applicant must: (a) minimise the off-site dust, fume and blast emissions of the development; and (b) minimise the surface disturbance of the site.	Triggered	Site inspection - 6 June 2023 20230224 CR3WF Formal Complaints Register	During the site inspection no dust was visible, disturbance has minimised to access roads and construction areas only, fencing and signage clearly indicate 'No Go' areas. A dust complaint received 10 December 2022 Dust management on Graywood Siding Rd, Contractor was notified and mitigation measure implemented.	Compliant
	SOIL & WATER				
	Water Supply				
B16	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.	Triggered	Crookwell 3 - Water tracking sheets dates Feb - June 2023 Site inspection - 6 June 2023	Potable water tracking sheet provided. All water used during construction for moisture along road compaction or for dust suppression, was pumped out from Farm-Dams. All water collected was in accordance with a private agreement between Divall's and the Landowner who owns Domestic and stock rights/Harvestable rights to the property.	Compliant
	Water Pollution				
B17	Unless an EPL authorises otherwise, the Applicant must comply with Section 120 of the POEO Act. Note: Section 120 of the POEO Act makes it an offence to pollute any waters.	Triggered	Site inspection - 6 June 2023	During the site inspection all sediment and erosion control measures were in place, the concrete batching plant was well bunded and operating correctly.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Stormwater Management Plan				
B18	<p>Prior to commencing construction, the Applicant must prepare a Stormwater Management Plan in consultation with WaterNSW and to the satisfaction of the Secretary. The plan must:</p> <p>(a) be prepared by an appropriately qualified engineer;</p> <p>(c) demonstrate a Neutral or Beneficial Effect on the receiving environment in terms of water quality;</p> <p>(d) include the following:</p> <ul style="list-style-type: none"> • details of existing site hydrology and drainage systems; • details of internal access road locations, temporary and permanent structures, existing erosion control works and expected earthworks and related infrastructure; • specifications of all existing and proposed sediment and erosion control works. All sediment and erosion control works should be designed in accordance with Managing Urban Stormwater: Soils and Construction (Landcom 2004) and Managing Urban Stormwater: Soils and Construction Volume 2A Installation of Services and Volume 2C Unsealed Roads (DECC, 2007 - the 'Blue Book Vol.2); • specifications and designs for all stormwater management structures required to provide ongoing water quality control for the development; • stormwater quality modelling (using the MUSIC software) consistent with Using MUSIC in Sydney Drinking Water Catchment (WaterNSW, 2019) to demonstrate that all stormwater management structures will achieve a neutral or beneficial effect on the receiving water catchments; and • a maintenance and management plan required to be implemented to ensure the long-term performance of all permanent stormwater management infrastructure. <p>Following the Secretary's approval, the Applicant must implement the measures described in the Stormwater Management Plan.</p>	Triggered	<p>Mertens 2021, Erosion and Sediment Control Plan prepared by Martens Consulting Engineers on behalf of Crookwell 3 Pty Ltd (Rev 3)</p> <p>DPE 2021 , Crookwell 3 Wind Farm (SSD-6695) Stormwater Management Plan approval letter - dated 24 September 2021</p> <p>Stormwater Design Strategy Summary 6, dated September 2021</p> <p>Site Inspection - 6 June 2023</p>	<p>Erosion and Sediment Control Plan was developed in consultation with Water NSW and approved by the Secretary. Site management measures have been implemented on site to ensure that receiving water are not impacted by the project. Dust was not visible on site during the inspection , all erosion and sediment controls measures were in place and well maintained, Concrete batching plant was bunded, sediment basins were will established for receiving waters, all chemicals stored and appropriately bunded.</p>	Compliant
	Operating Conditions				
B19	<p>The Applicant must:</p> <p>(a) ensure the wind turbines and ancillary infrastructure, particularly any access roads on steep slopes, are designed, constructed and maintained to minimise any soil erosion;</p> <p>(b) minimise any soil erosion associated with the construction and decommissioning of the development by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction (Landcom, 2004), or its latest version;</p> <p>(c) ensure all waterway crossings are constructed in accordance with the:</p> <ul style="list-style-type: none"> • Water Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and • Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version; <p>(d) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version;</p> <p>(e) ensure the concrete batching plants and substation are suitably bunded; and</p> <p>(f) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.</p>	Not Triggered	<p>Operational phase of the project</p>	<p>Operational phase of the project</p>	Not Triggered

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
BIODIVERSITY					
Restrictions on Clearing and Habitat					
B20	<p>Unless the Secretary agrees otherwise, the Applicant must:</p> <p>(a) ensure that no more than:</p> <ul style="list-style-type: none"> • 0.32 ha of Derived grassland of the South Eastern Highlands Bioregion and South East Corner Bioregion (PCT 797) endangered ecological community is cleared for the development; • 0.22 ha of Ribbon Gum - Narrow-leaved Peppermint grassy open forest on basalt plateaux, Sydney Bioregion and South Eastern Highlands Bioregion (PCT 1097) endangered ecological community is cleared for the development; • no more than 1.5 ha of Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion (PCT 1330) endangered ecological community is cleared for the development; and <p>(b) implement reasonable and feasible measures to minimise:</p> <ul style="list-style-type: none"> • the impacts of the development on hollow-bearing trees; • the impacts of the development on threatened bird and bat populations; and • the clearing of native vegetation and key habitat within the approved disturbance footprint. 	Triggered	<p>CW3 External Preclearing Survey FINAL - dated 10/22 CW3 Internal PIR v1.1 Site Inspection - 6 June 2023</p>	<p>Clearing reports attached - Graywood Siding Rd and internal interim report Intent to modify required offsets letter.</p> <p>Post-construction surveys underway now</p>	Compliant
Biodiversity Offset					
B21	<p>Prior to the commencement of construction, unless the Secretary agrees otherwise, the Applicant must:</p> <p>(a) update the baseline mapping of the vegetation and key habitat within the final disturbance area; and</p> <p>(b) calculate the biodiversity offset credit liabilities for the development in accordance with the NSW Biodiversity Offsets Scheme, in consultation with BCD, and to the satisfaction of the Secretary.</p>	Not Triggered	<p>Cumberland 2022, Crookwell 3 Wind Farm Biodiversity Development Assessment Report, prepared by Cumberland Ecology on behalf of Crookwell 3 Development Pty Ltd DPE 2022, Approval of the revised BDAR - dated 21 June 2022 Site Inspection - 6 June 2023</p>	<p>Measures to avoid and minimise impacts to the biodiversity values of the subject land have been carefully considered and implemented during the design phase with a reduction of the development footprint from 30 to 16 turbines. The placement of turbines in cleared or treeless areas, several amendments to the proposed turbine locations, which has resulted in all 16 turbine footprints now being situated in grassland areas. The use of existing infrastructure within Crookwell 2 and designing access around existing tracks and roads all measures used to avoid clearing of native vegetation. As such, the development has demonstrated reasonable steps to avoid and minimise impacts based upon the project location and design within the subject land. With the above design measure taken it is considered that the project meets the no net loss standard required under the BAM.</p>	Not Triggered
B22	<p>Within two years of the commencement of construction, unless the Secretary agrees otherwise, the Applicant must retire the required biodiversity credits, unless the secretary agrees otherwise. The retirement of the credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:</p> <p>(a) acquiring or retiring 'biodiversity credits' within the meaning of the BC Act;</p> <p>(b) making payments into an offset fund that has been developed by the NSW Government; or</p> <p>(c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.</p>	Not Triggered		As above	Not Triggered

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Biodiversity Management Plan				
B23	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with BCD; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> • a description of the measures that would be implemented for: <ul style="list-style-type: none"> - minimising the amount of native vegetation clearing within the approved development footprint; - minimising the loss of key fauna habitat, including tree hollows; - minimising the impacts on fauna on site, including undertaking pre-clearance surveys; - minimising the potential indirect impacts on threatened species, including: <ul style="list-style-type: none"> • fauna species, including the Gang Gang Cockatoo (<i>Callocephalon fimbriatum</i>) and Squirrel Glider (<i>Petaurus norfolcensis</i>) - pre-clearing protocols including pre-clearing fauna surveys; - rehabilitating and revegetating temporary disturbance areas; - protecting native vegetation and key fauna habitat outside the approved disturbance area; - maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (including fauna habitat enhancement) during the rehabilitation and revegetation of the site; - collecting and propagating seed (where relevant); - controlling weeds and feral pests; - controlling erosion; and - bushfire management; • a detailed program to monitor and report on the effectiveness of these measures. <p>Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p>	Triggered	<p>Cumberland 2022, Crookwell 3 Wind Farm Biodiversity Development Assessment Report, prepared by Cumberland Ecology on behalf of Crookwell 3 Development Pty Ltd</p> <p>DPE 2022, Approval of the revised BDAR - dated 21 June 2022</p> <p>Site Inspection - 6 June 2023</p>	<p>DPE letter 2022 I note the BDAR has been:</p> <ul style="list-style-type: none"> <input type="checkbox"/> prepared in consultation with the Biodiversity and Conservation Division; and <input type="checkbox"/> contains the information required by the conditions of approval. <p>Fencing / Signage on site used to prevent any further clearing in an aim to minimise footprint. Management measures have been implemented on site.</p>	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Bird and Bat Adaptive Management Plan				
B24	<p>Prior to the commissioning of any wind turbines, the Applicant must update the Crookwell 2 Wind Farm Bird and Bat Adaptive Management Plan to include the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must include:</p> <p>(a) at least 12 months' worth of baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could be affected by Crookwell 2 Wind Farm and the development;</p> <p>(b) a detailed description of the measures that would be implemented on site for minimising bird and bat strike during operation of the development, including:</p> <ul style="list-style-type: none"> • minimising the availability of raptor perches on wind turbines; • bird and bat mortality monitoring including surveys, estimates of annual strikes prompt carcass removal; • measures to control feral pests and stock that might attract foraging raptors; and • using best practice methods for bat deterrence, including managing potential lighting impacts; <p>(c) trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations;</p> <p>(d) an adaptive management program that would be implemented if the development is having an adverse impact on a particular threatened or 'at risk' bird and/or bat species or populations; including the implementation of measures to:</p> <ul style="list-style-type: none"> • reduce the mortality of those species or populations such as land management and reducing threatened and 'at risk' bird and bat species activity around turbines; or • enhance and propagate those species or populations in the locality; and <p>(e) a detailed program to monitor and report on:</p> <ul style="list-style-type: none"> • the effectiveness of these measures; and • any bird and bat strikes on site; • incidences of reaching trigger levels; <p>(f) provisions for a copy of all raw data collected as part of the monitoring program to be submitted to BCD and the Secretary. Following the Secretary's approval, the Applicant must implement the updated Crookwell 2 Wind Farm Bird and Bat Adaptive Management Plan.</p>	Not Triggered		Consultation on requirements commenced, commissioning in late November/December 2023	Not Triggered
	HERITAGE				
	Protection of Heritage Items				
B25	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or any Aboriginal heritage items located outside the approved development footprint.	Triggered	ERM 2021, Crookwell 3 Heritage Management Plan prepared by ERM on behalf of Crookwell 3 Development ty Ltd. (Revision 3, Version 2.1, dated 7 July 2021 DPE 2021, Letter approving Heritage Management Plan - dated	The Project management team is implementing the HMP to ensure that the development does not cause direct or indirect impacts on heritage items.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
B26	The Applicant must minimise impacts to heritage items identified in Table 2 and Table 3 of Appendix 3.	Triggered	Heritage Management Plan - dated 12 August 2021		Compliant
B27	If impacts to the heritage items identified in Table 2 of Appendix 3 cannot be avoided, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must conduct subsurface testing to determine appropriate management measures, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.	Not Triggered			Not Triggered
B28	If impacts to the heritage items identified in Table 3 of Appendix 3, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 3 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location conduct subsurface testing to determine appropriate management measures, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version. Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.	Not Triggered			Not Triggered
Protection of Heritage Items					
B29	<p>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with Heritage NSW and Aboriginal stakeholders;</p> <p>(c) include up to date baseline mapping of the heritage items within and adjoining the development disturbance area;</p> <p>(d) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • avoiding the impacts of the development on heritage items identified in Table 1 in Appendix 3; • subsurface testing methodology for items identified in Table 2 in Appendix 3; • managing impacts on items in Table 3 in Appendix 3; • subsurface testing and salvage methodologies prepared in accordance with Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010) and testing and salvage to involve the Aboriginal stakeholders; • process for salvage of items that are unable to be avoided including protection (short and long term), storage and management of salvaged Aboriginal objects; and maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage items on site; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - Aboriginal heritage items outside the approved disturbance area are damaged; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; • 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>(e) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; a program to monitor and report on the results of investigations and effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	Triggered	ERM 2021, Crookwell 3 Heritage Management Plan prepared by ERM on behalf of Crookwell 3 Development Pty Ltd. (Revision 3, Version 2.1, dated 7 July 2021 DPE 2021, Letter approving Heritage Management Plan - dated 12 August 2021 Site Inspection - 6 June 2023 - Site induction completed - contained cultural heritage information DPE letter - dated 30 April 2021 - Approval of the Heritage Management Plan Specialist Endorsement	Crookwell 3 Site induction contains cultural heritage training and what to procedures to following the event that a items was uncovered during construction.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
TRANSPORT					
Designated Heavy and Over-Dimensional Vehicle Routes					
B30	The Applicant must ensure that all over-dimensional and heavy vehicle access to and from the site is via Picton Road (Main Road 88), Hume Highway, Cowper Street, Clinton Street, Deccan Street, Fitzroy Street, Crookwell Road and Woodhouselee Road, as identified in the figures in Appendix 4, unless the Secretary agrees otherwise. Notes: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over dimensional vehicles on the road network.	Triggered	CW3WF 02 T2 GN 4x4 4x8 5.3m 4.6m 39.9m 823130V1 - OD Permit	Over dimensional equipment not arrived as yet, permit sighted - and in place for equipment to arrive after the 9 June 2023. The project will ensure that all relevant permits are in place.	Compliant
Road Upgrades					
B31	Prior to the commencement of construction, the Applicant must prepare a report to identify the required road upgrades for the designated and over-dimensional vehicle routes and site access, to the satisfaction of the relevant roads authority and submit it to the Secretary. If there is a dispute about the road upgrades to be implemented, or the implementation of these upgrades, then either party may refer the matter to the Secretary for resolution.	Triggered	Stantec 2022, Crookwell 3 Wind Farm Traffic Management Plan Issue G, dated 7 April 2022 prepared by Stantec Australia Pty Ltd for Crookwell 3 Development Pty Ltd	Road upgrade report forms part of the approved TMP Sections 4.8.6 and 4.8.7 - address CoC B31, report was provided to the Secretary and approval was received on the 06 May 2022	Compliant
B32	Prior to the commencement of construction, the Applicant must implement the road upgrades identified in condition 32 of Schedule 3, to the satisfaction of the relevant roads authority.	Triggered	Stantec 2022, Crookwell 3 Wind Farm Traffic Management Plan Issue G, dated 7 April 2022 prepared by Stantec Australia Pty Ltd for Crookwell 3 Development Pty Ltd. DPE 2022, Letter approving the TMP dated 06 May 2022	The TMP has been implemented and road upgrades have taken place in accordance with the TMP.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Road Maintenance				
B33	<p>The Applicant must:</p> <p>(a) prepare a dilapidation survey of Hume Street, Cowper Street, Clinton Street, Deccan Street, Fitzroy Street, Crookwell Road and Woodhouselee Road in accordance with guidelines and standards established by Austroads of the designated vehicle route, as identified in the figures in Appendix 4:</p> <ul style="list-style-type: none"> • prior to the commencement of any construction and/or decommissioning works, other than preconstruction minor works; • within 1 month of the completion of any construction and/or decommissioning works, other than pre-construction minor works; <p>(b) rehabilitate and/or make good any development-related damage:</p> <ul style="list-style-type: none"> • identified during the carrying out of the relevant construction and/or decommissioning works if it could endanger road safety, as soon as possible after the damage is identified, but within 7 days at the latest; and • identified during any dilapidation survey carried out following the completion of the relevant construction and/or decommissioning works within 2 months of the completion of the survey, unless the relevant roads authority agrees otherwise, to the satisfaction of the relevant roads authority. <p>If the construction and/or decommissioning of the development is to be staged, the obligations in this condition apply to each stage of construction and/or decommissioning.</p> <p>If there is a dispute about the scope of any remedial works or the implementation of these works, then either party may refer the matter to the Secretary for resolution.</p>	Triggered	Woodhouselee Rd Delap reports - Dec 2022 - sighted during sight inspection	Delap reports have ben completed in accordance with the guidelines and standards established by Austroads.	Compliant
	Unformed Crown Roads				
B34	The Applicant must ensure any unformed Crown road reserves affected by the development are maintained for future use, unless otherwise agreed with the Crown Lands.	Triggered	20210428-Crown Road - CW3 Design Clash87 - image within photo section of the report. Executed licence 633371	Unformed crown land road reserve zig zag across the development. The proponent has a licence to occupy the crown roads for the purpose of establishing and running the windfarm. There are 4 areas where the access roads cross the unformed crown road reserves. Once the development is completed the access roads will only be used for routine maintenance. Site access tracks do not infringe upon the use of the crown land, or impede any future use as actual roads.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Traffic Management Plan				
B35	<p>Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with the relevant roads authority, and to the satisfaction of the Secretary. This plan must include:</p> <p>(a) details of the transport route to be used for all development-related traffic;</p> <p>(b) details of the road upgrade works required by condition 32 of Schedule 3 of this consent;</p> <p>(c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> • details of the dilapidation surveys required by condition 34 of Schedule 3 of this consent; • temporary traffic controls, including detours and signage; • notifying the local community about development-related traffic impacts; • notifying the relevant Council prior to oversize heavy vehicle movements through the respective local government area; • procedures for receiving and addressing complaints from the community about development related traffic; • minimising potential cumulative traffic impacts with other State significant development projects in the area; • minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network; • minimising dirt tracked onto the public road network from development-related traffic; <p>(d) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> • details of the 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; • encouraging car-pooling or ride sharing by employees; • scheduling of haulage vehicle movements to minimise convoy length or platoons; • responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; • responding to any emergency repair or maintenance requirements; and • a traffic management system for managing over-dimensional vehicles; <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>(f) a detailed program to monitor and report on the effectiveness of these measures and the code of conduct. Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>	Triggered	<p>Stantec 2022, Crookwell 3 Wind Farm Traffic Management Plan Issue G, dated 7 April 2022 prepared by Stantec Australia Pty Ltd for Crookwell 3 Development Pty Ltd.</p> <p>DPE 2022, Letter approving the TMP dated 06 May 2022</p> <p>Site inspection - 6 June 2023</p> <p>Woodhouselee Rd Delap report sighted during site inspection.</p> <p>Crookwell 3 - Truck Driver Information Presentation (PowerPoint)</p>	<p>Traffic management strategies have been implemented for this stage of the project, large WT equipment will not arrive until later in the year. At which time the correct permits will be in place. Drivers code of conduct is covered within the site induction process, car pooling is undertaken where practical.</p>	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
AVIATION					
Notification of Aviation Authorities					
B36	Prior to the construction of any wind turbine or wind monitoring mast, the Applicant must provide the following information to CASA, Airservices Australia, and the RAAF (together the authorities): (a) co-ordinates in latitude and longitude of each wind turbine and mast; (b) the final height of each wind turbine and mast in Australian Height Datum; (c) ground level at the base of each wind turbine and mast in Australian Height Datum; (d) confirmation of compliance with any OLS; and (e) details of any proposed aviation hazard lighting.	Not Triggered			Not Triggered
B37	Within 30 days of the installation of any wind turbine or mast, the Applicant must: (a) provide confirmation to the authorities that the information that was previously provided remains accurate; or (b) update the information previously provided.	Not Triggered			Not Triggered
TELECOMMUNICATIONS					
B38	If the development results in the disruption to any radiocommunications or telecommunications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following notification of the disruption of the service unless the relevant service provider or user or Secretary agrees otherwise. If there is a dispute about the mitigation measures to be implemented or the implementation of these mitigation measures, then either party may refer the matter to the Secretary for resolution.	Not Triggered			Not Triggered

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
BUSHFIRE					
B39	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) ensure that the development: <ul style="list-style-type: none"> • provides for asset protection in accordance with the RFS's Planning for Bushfire Protection 2019 (or equivalent); and • is suitably equipped to respond to any fires on site; (b) develop procedures to manage potential fires on site, in consultation with the RFS; and (c) assist the RFS and emergency services as much as possible if there is a fire in the vicinity of the site. 	Triggered	Devall's - 5.01 Emergency Response Drill. CW3 Emergency Services Briefing	Drill debrief report provided Site familiarisation and ERP review and briefing for Emergency Services personnel has also occurred during August 2023 in preparation for next fire season - records sighted	Compliant
EMERGENCY PLAN					
B40	<p>Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <ul style="list-style-type: none"> (d) be consistent with the RFS's Planning for Bushfire Protection 2019 (or equivalent); (e) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; (f) list works that should not be carried out during a total fire ban (g) include availability of fire suppression equipment, access and water; (h) include procedures for the storage and maintenance of any flammable materials; (i) 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; (j) include a figure showing site infrastructure, Asset Protection Zone and the on-site water supply tank; (k) include location of hazards (physical, chemical and electrical) that may impact on fire-fighting operations and procedures to manage identified hazards during fire-fighting operations; (l) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; (m) include bushfire emergency management planning; and (n) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none"> • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period. <p>Following approval, the Applicant must implement the Emergency Plan.</p>	Triggered	ERM 2021, Crookwell 3 Wind Farm Bushfire Emergency Management Plan prepared by ERM on behalf of Crookwell 3 Development Pty Ltd DPE 2021, Crookwell 3 Wind Farm (SSD-6695) Emergency Plan - letter of approval dated 24 September 2021 Site Inspection - 6 June 2023	as above	Compliant
SAFETY					

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
B41	The Applicant must: (a) prepare a Safety Management System for the development in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management' prior to the commencement of operation; and (b) implement, and if necessary update, the system over the remaining life of the development.	Triggered	Site Inspection - 6 June 2023 2023_CROOKWELL_3_PIRMP_Rev A	All chemicals are stored correctly on site and contained within bunded areas, safety and fire drill have been completed on site as per the above.	Compliant
WASTE					
B42	The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste generated on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) ensure all waste is disposed of at appropriately licensed waste facilities.	Triggered	Site Inspection - 6 June 2023	Waste on site was clearly segregated and contained within skip bins, a licenced waste contractor removed all material from site.	Compliant

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)																		
REHABILITATION & DECOMMISSIONING																							
Rehabilitation Objectives - Decommissioning																							
B43	<p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3.</p> <p><i>Table 3: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Development site (as a whole)</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible </td> </tr> <tr> <td>Revegetation</td> <td> <ul style="list-style-type: none"> Restore native vegetation generally as identified in the EIS To be decommissioned and removed, unless the Secretary agrees otherwise </td> </tr> <tr> <td>Above ground wind turbine infrastructure (excluding wind turbine pads)</td> <td> <ul style="list-style-type: none"> To be covered with soil and/or rock and revegetated (ie. the wind turbine foundations will not be removed and will remain underground) To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary </td> </tr> <tr> <td>Wind turbine pads</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary </td> </tr> <tr> <td>Above ground ancillary infrastructure</td> <td> <ul style="list-style-type: none"> Restore or maintain land capability as described in the EIS Ensure public safety </td> </tr> <tr> <td>Internal access roads</td> <td> <ul style="list-style-type: none"> Restore or maintain land capability as described in the EIS Ensure public safety </td> </tr> <tr> <td>Land use</td> <td></td> </tr> <tr> <td>Community</td> <td></td> </tr> </tbody> </table>	Feature	Objective	Development site (as a whole)	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible 	Revegetation	<ul style="list-style-type: none"> Restore native vegetation generally as identified in the EIS To be decommissioned and removed, unless the Secretary agrees otherwise 	Above ground wind turbine infrastructure (excluding wind turbine pads)	<ul style="list-style-type: none"> To be covered with soil and/or rock and revegetated (ie. the wind turbine foundations will not be removed and will remain underground) To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary 	Wind turbine pads	<ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary 	Above ground ancillary infrastructure	<ul style="list-style-type: none"> Restore or maintain land capability as described in the EIS Ensure public safety 	Internal access roads	<ul style="list-style-type: none"> Restore or maintain land capability as described in the EIS Ensure public safety 	Land use		Community		Not Triggered			Not Triggered
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Community																							
Progressive Rehabilitation																							
B44	<p>The Applicant must:</p> <p>(a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</p> <p>(b) minimise the total area exposed at any time; and</p> <p>(c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	Triggered	<p>Site Inspection - 6 June 2023</p> <p>Weekly site inspection</p> <p>Environmental Compliance On 4:11 PM 18/07/2023 - Crookwell 3 Wind Farm</p> <p>Compliance On 2:42 PM 19/05/2023 - Crookwell 3 Wind Farm</p>	Weekly inspection sighted, clearing and grubbing of the site has taken place, progressive rehabilitation has occurred with clear delineation of works, inspection sheets include weed control.	Compliant																		
Dismantling of Wind Turbines																							
B45	Any individual wind turbines which cease operating for more than 12 consecutive months must be dismantled within 18 months after that 12 month period, unless the Secretary agrees otherwise.	Not Triggered			Not Triggered																		

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CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
PART C	Schedule 4 - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
	ENVIRONMENTAL MANAGEMENT				
	Environmental Management Strategy				
C1	<p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the 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> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> • copies of (or reference to) any strategies, plans and programs approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	Triggered	ERM 2021, Crookwell 3 Wind Farm Environmental Management Strategy, prepared by ERM Pty Ltd 20230224 CR3WF Formal Complaints Register Site Inspection - 6 June 2023 Toolbox talk - 15/6/23 Toolbox talk - 28/6/23	The project are has been managed in accordance with the EMS, site inspection are occurring on a regular basis and cover the environmental monitoring as cover in Section 5.1 of the EMS. All sediment and erosion control measure on site were well maintained, sediment basins were well maintained and water used controlled on site. Emergency plans were in place. Toolbox meeting minutes sighted - cover off basic earth works and sediment controls.	Compliant
	Environmental Management Strategy				
C2	<p>Within 3 months of the submission of:</p> <p>(a) an incident report under condition 4 below;</p> <p>(b) an independent environmental audit report under condition 6 below; or</p> <p>(c) any modification to the conditions of this consent (unless the conditions require otherwise), the Applicant must review and, if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	Triggered	ERM 2021, Crookwell 3 Wind Farm Environmental Management Strategy, prepared by ERM Pty Ltd 20230224 CR3WF Formal Complaints Register Site Inspection - 6 June 2023	Strategies and plans are reviewed annually, no revision required to be submitted to Secretary.	Compliant

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Community Consultative Committee				
C3	The Applicant must operate a Community Consultative Committee for the development to the satisfaction of the Secretary and in accordance with the Community Consultative Committee Guidelines for State Significant Project (2016), or its latest version.	Triggered	Crookwell 2 and 3 Wind Farms CCC meetings are jointly run as Per CoC C4. Presentations for the meetings can be found https://crookwellthreewindfarm.globalpower-generation.com.au/sustainability/community/community-consultation-committee-minutes/ CCC Minutes only available till 18 August 2022 (upon request) minutes were up dated to include 2023	Presentations for the CCC were available, only till August 2022 (NC) Presentation did not include the minutes of the meetings. In response to the RFI - proponent provided minutes of meetings, and ensured that they were up dated on the project website to ensure compliance.	Compliant
C4	With the Secretary's approval, the CCC required under condition 3 of Schedule 4 may be operated jointly with the Crookwell 2 Wind Farm CCC.	Triggered	Crookwell 2 and 3 Wind Farms CCC meetings are jointly run Presentations for the meetings can be found https://crookwellthreewindfarm.globalpower-generation.com.au/sustainability/community/community-consultation-committee-minutes/	The CCC has been operated jointly with Crookwell 2 as per the CoC C4.	Compliant
	NOTIFICATIONS				
	Notification of Department				
C5	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	DPE letter dated 14 September 2022 - Crookwell # Wind Farm 3 (SSD 6695) Notification of commencement of construction	Notification was made to the Department prior to commencing construction.	Compliant
C6	If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Triggered	DPE letter dated 14 September 2022 - Crookwell # Wind Farm 3 (SSD 6695) Notification of commencement of construction	Notification was made to the Department prior to commencing construction the stage of the commencement was included in the notification.	Compliant

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	Final Layout Plans				
C7	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 wind turbines and ancillary infrastructure, via the Major Projects website.	Triggered	Crookwell 3 Windfarm - Final Layout Plans - submitted via the Major Projects website - by G. Alonso	Prior to commencing construction Final Layout Plans were submitted via the Major Project website. The plans contained final layout of the development including location of WT and ancillary infrastructure.	Compliant
	Work as Executed Plans				
C8	Prior to commencing operations, or following the upgrades of any wind turbines or ancillary infrastructure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website.	Not Triggered			Not Triggered
	Incident Notification				
C9	The Department must be notified in writing via the Major Projects website portal 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.	Not Triggered		No incidents or non compliances as this stage of the project.	Not Triggered
	Non-Compliance Notification				
C10	The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is noncompliant with, the way in which it does not comply and the reasons for the non- compliance (if known) and what actions have been done, or will be, undertaken to address the non- compliance.	Not Triggered	No incidents recorded	No incidents recorded	Not Triggered

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
	INDEPENDENT ENVIRONMENTAL AUDIT				
C11	<p>Within 6 months of the commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. The audits must:</p> <p>(a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPIE 2020);</p> <p>(b) be led and conducted by a suitably qualified, experienced and independent expert/s whose appointment has been endorsed by the Secretary;</p> <p>(c) be carried out in consultation with the relevant agencies;</p> <p>(d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and</p> <p>(e) if directed by the Secretary, assess whether the performance of any noise mitigation measures implemented, including sector management and sound management mode, ensure compliance with the noise criteria in this consent; and</p> <p>(f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.</p> <p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.</p> <p>The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p>	Triggered	<p>EMM 2023 Crookwell 3 IEA (This IEA report)</p> <p>Notification as per CoC C5 - notification of commencement received by the DPE - 14 September 2022</p>	<p>The IEA was not undertaken within 6mth of commencement of construction, ambiguity between notification of minor works - building access roads and commencement of construction caused confusion delaying the trigger requiring the IEA. RECOMMEND: Ensure that the project undertakes the 3 yrs. IEA within the required time frame. (could this be undertaken in conjunction with Crookwell 2 - IEA)</p>	Non-compliant

Crookwell 3 Wind Farm SSI 6695 - IEA

CoC #	Requirement	Triggered for First audit cycle	Evidence collected	Audit findings and recommendations	Status (Compliant/Non-compliant/ Not triggered)
ACCESS TO INFORMATION					
C12	<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> <ul style="list-style-type: none"> • the EIS; • the final layout plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; • a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, which is to be updated on a monthly basis; • minutes of CCC meetings; • the annual Statement of Compliance with the EPL; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	Triggered	<p>Crookwell 3 Project Website https://crookwellthreewindfarm.globalpower-generation.com.au/the-project/relevant-documentation/ accessed 8 August 2023</p> <p>The following was available</p> <ul style="list-style-type: none"> *2022-01-31-Crookwell-3-Dwellings-Plan_RevB.pdf *Jo-Marshall-Sealed-final-orders-2020.10.14. pdf *CW3 Wind Farm, Environmental Management Strategy May 2021 (GPG) *Crookwell-3-Wind-Farm-Project-Storm-Water-Management-Plan-Approved-Version-Combined-Document.pdf *Complaints register - NOT available (provided as an RFI) *CCC meeting presentations provided - NO minutes 	<p>Information provided in a clear and concise manner. Not all documentation provided EIS, CCC presentations provided (only up to August) Minutes provided and updated on the website (as a result of RFI) as such (CoC C3) Complaints register absent form Project website - sited during IEA.</p> <p>RECOMMEND:</p> <p>To ensure that all relevant and up to date documentation can be accessed, suggest providing a link to the Major Project Portal - where all current documentation can be accessed. Monitoring data should be made available once completed.</p> <p>Complaints register to be made available on the website, with last date uploaded.</p> <p>Annual Statement of compliance should be made available.</p>	Non-compliant

Appendix E

Non-Compliance and Opportunity for Improvement Register

E.1 Appendix Heading

Table E.1 Non-Compliance and Opportunity for Improvement Register

CoC #	Noncompliance	Corrective Action	Proponent Response
NC#1 - C11	<p>The IEA was not undertaken within 6mth of commencement of construction, ambiguity between notification of minor works - building access roads and commencement of construction caused confusion delaying the trigger requiring the IEA.</p> <p>RECOMMENDATION: Ensure that the project undertakes the 3yr IEA within the required time frame. (Could this be undertaken in conjunction with Crookwell 2 - IEA</p>	Ensure that the next IEA is undertaken with the 3yr timeframe to ensure ongoing compliance.	Audit date deadlines for subsequent audits have been placed on the Operations compliance calendar.
NC#2- C12	<p>Public access to information through the project website. Information was provided in a clear and concise manner. Not all documentation listed in the C12 was available. (EIS not available, CCC presentations provided (only up to August 2022) Minutes provided and updated on the website (because of RFI and in compliance with CoC C3) Complaints register absent form project website – register sited during IEA.</p> <p>RECOMMENDATION: Suggest providing a link to the Major Project Portal - where all current documentation can be accessed. Once available monitoring data should also be provided. Complaints register to be made available on the website, with last date uploaded. Annual Statement of compliance should be made available as stated in C12.</p>	Ensure all items listed on C12 are available on the project website within the next 3mths.	<p>EIS and up to date CCC minutes now available on the project website. EIS documents are linked via Major Projects Portal. Complaints register available with identifying information removed. Annual statement of compliance with EPL will be uploaded following completion of annual return currently underway, due 05/12/2023.</p> <p>https://crookwellthreewindfarm.globalpower-generation.com.au/the-project/relevant-documentation/</p>
OP#1	Ensure that noise impacts from EPC contractor are assessed against Sch 3.13 to ensure they are compliant where differing equipment or locations are required.	Review EPC contractor plant and equipment against SCH 3.13	Multiple noise estimates undertaken using TfNSW construction noise calculator tool. Attended noise monitoring undertaken by EPC contractor.
OP#2	Ensure a review of the systems in use by the EPC contractor occurs to ensure a transfer of knowledge between the BOP and EPC contractors occurs. This is suggested to ensure the compliance systems in use currently are maintained or other systems are in place for this phase of the project.	Conduct a handover with BOP and EPC contractors	EPC contractor HAZCON workshop undertaken with input from BOP on 14 June 2023.

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