EARTHWORKS & SITING MANAGEMENT PLAN

131-3227

Palmer Wind Farm Balance of Plant

Document No.: PMWF-BMD-PRM-PLN-0006

Rev H

POWERING FUTURES,
CREATING LEGACIES.

Job Name:	Palmer Wind Farm - Balance of Plant		
Job No.:	131-3227		
Client:	Tilt Renewables Australia Pty Ltd		
Authorised by:	Trent Dunoon	**Date:**	16/06/2026
Reviewed by:	Micala Witton	**Date:**	16/06/2026

DOCUMENT VERSION CONTROL

This Project specific plan was developed based on the BMD Management Plan - Environmental Management Plan - HEQ-TPE-00390 Rev. 17 (30/05/2025).

Rev. No.	Rev. Date	Details of Revision	Reviewed by	Approved by
A	16/01/2026	Draft developed for Principal review	Micala Witton	Trent Dunoon
B	03/02/2026	Following Tilt Review	Micala Witton	Trent Dunoon
C	20/02/2026	Following Tilt's Second Review	Micala Witton	Trent Dunoon
D	16/03/2026	Following Tilt's Third Review	Micala Witton	Trent Dunoon
E	6/05/2026	Finalising for submission to SPC	Micala Witton	Trent Dunoon
F	12/05/2026	Minor amendments	Micala Witton	Trent Dunoon
G	02/06/2026	Addition of Final Layout Plan	Micala Witton	Trent Dunoon
H	16/06/2026	Minor amendment for submission to SPC	Micala Witton	Trent Dunoon

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1. INTRODUCTION

1.1. Purpose and scope

The Earthworks and Siting Management Plan (ESMP) forms part of the Construction Environmental Management Plan for BMD. The ESMP describes how BMD proposes to manage the earthworks and siting requirements during the construction of the Palmer Wind Farm.

This document has been prepared to satisfy Reserved Matter 6 (RM6) for the project, which states that "*A final Earthworks Plan and Siting Plan shall be prepared and submitted to the satisfaction of the State Planning Commission, detailing the following:*

- *The final layout plan(s) for each state from Reserved Matter 1;*
- *All cut and fill that minimises disturbance to the natural topography;*
- *Rehabilitation and revegetation of surfaces exposed by earthworks to minimise visual impacts; and*
- *Gradient(s) of access tracks that confirms the safe and convenient movement of vehicles."*

The primary purpose of the ESMP is to describe the management systems and procedures which will be adhered to in achieving project environmental objectives and goals. It describes how BMD Constructions propose to manage and control environmental aspects and potential impacts of the project, through both project-wide and element-specific approaches. The ESMP describes all applicable procedures, processes, and practices to be undertaken by BMD Constructions and subcontractors in order to manage environmental risks, effectively minimise impacts on the surrounding environment, and ensure compliance with regulatory and other obligations throughout project delivery.

This ESMP is one of several environmental management plans (EMPs) for the Project. The ESMP and its procedures will be applicable to all project works, staff, and subcontractors during construction of this project.

1.2. Environmental management system

To achieve the intended environmental objectives and goals, BMD Constructions have established, implemented, maintained and continually improved an Environmental Management System (EMS) in accordance with the requirements of ISO14001:2016. An overview of the EMS is provided in the CEMP Section 1.2.

Furthermore, this ESMP is a stand-alone management plan that incorporates the Project Environmental Management Framework set out in Figure 1 below. This plan links to the Construction and Operational Environmental Management Plan (COEMP) to ensure compliance with the Reserved Matters obligations under the Planning Consent and forms part of the suite of management plans, as illustrated in Figure 1 below.

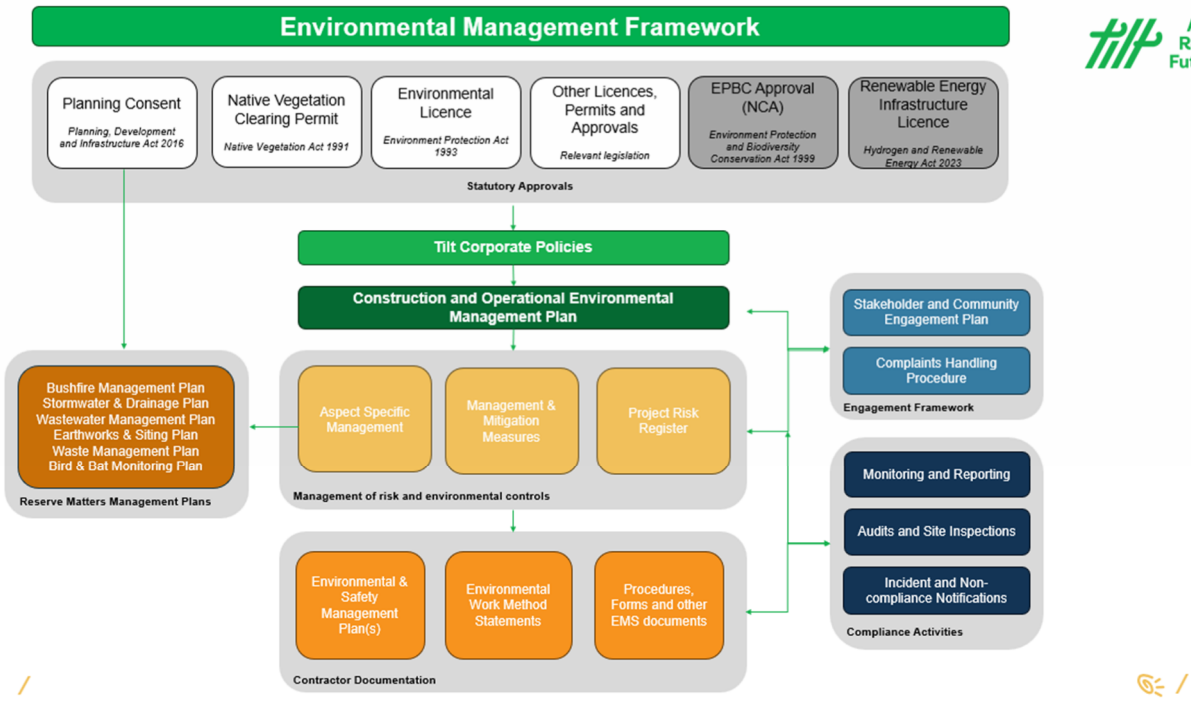


Figure 1: Project Environmental Management Framework

This Plan should be read in conjunction with the Project CEMP and relevant sub-plans and Reserved Matter Management Plans.

1.3. Project overview

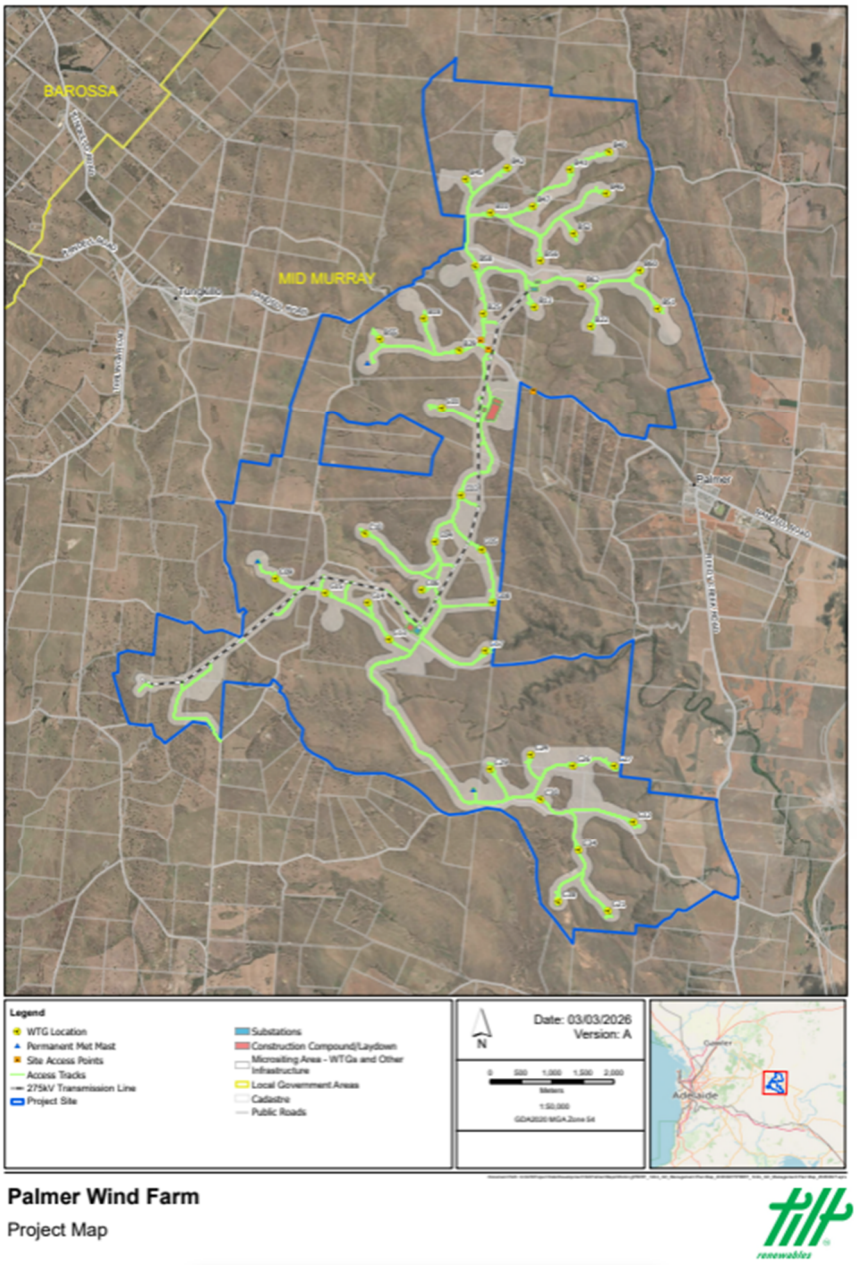
This document has been prepared for contract number 131-3227 (Palmer Wind Farm Project).

The Palmer Wind Farm Project (the Project) is located approximately 70 km east of Adelaide, between the townships of Palmer and Tungkillo, wholly contained within the Mid Murray Council (MMC) Local Government Area and on the lands of the Peramangk People. The Project will help reduce Australia's carbon footprint by generating up to 300MW of clean energy when constructed, which is enough to power up to 150,000 South Australian homes.

Palmer Wind Farm Pty Ltd (the Proponent) as trustee for Palmer Wind Farm Project Trust, is proposing to construct and operate up to 40 wind turbine generators, totalling approximately 288 megawatts (MW) of installed generation capacity as part of the Project, with associated wind farm infrastructure. The Project will connect to the national electricity grid via the existing Tungkillo Switchyard, owned and operated by ElectraNet.

Development authorisation by way of Development Plan Consent under the Development Act 1993 was granted for the Project by MMC in December 2015 (DA 711/072/14). A variation to the Development Plan Consent was approved by the State Commission Assessment Panel under the Planning, Development and Infrastructure Act 2016 (PDI Act) in February 2025 (DA 24005571; Planning Consent).

Figure 2: Location Map



Under the Planning Consent, micro-siting of turbines and associated infrastructure is permissible within the micro-siting area (see Figure 2) to respond to site constraints during finalisation of detailed design and construction sequencing. Examples may include a change in location following geotechnical assessment, construction and site accessibility for plant and equipment and/or to avoid identified environmentally sensitive areas.

1.4. Site overview

The wind farm site is located in the eastern Mount Lofty Ranges, South Australia, approximately 70 km east of Adelaide CBD. There are five key localities near the development: Palmer, Tungkillo, Cambrai, Sanderston and Milendella. Tungkillo has a population of approximately 600 people and includes the township of Tungkillo and

the town of Palmer, a small township (approximate population 75 people) that consists of a general store, hotel and a small primary school consisting of approximately 25 students.

Mount Pleasant is the regional centre of the area with a population of approximately 1000 people. Mount Pleasant has a number of facilities, including a small primary school. The wind farm will be located on a number of private properties, primarily used for farming and is predominantly rural in nature with limited residential properties.

The topography of the area comprises undulating hills of the eastern Mount Lofty Ranges, with steep escarpments present along geological fault zones, particularly at the eastern extent of the ranges. Steep sided valleys occur where watercourses cross the escarpments. There are a number of watercourses within the area, with the majority being ephemeral.

Notably, Reedy Creek occurs within the Project Area, in the eastern corner of the site. Additional named waterways of note in the site include Talbot Creek (southern extents), Dairy and Baker Creeks to the west and Harrison Creek the most Northern waterway within the Project. Importantly, no waterways exist north of Randell Road although Milendella Creek borders to the north-east corner of the site.

Transportation networks in the wider area consist of mainly unsealed gravel roads owned and maintained by the Mid Murray Council, plus regional / collector sealed roads servicing the townships.

2. OBJECTIVES AND TARGETS

The key objective of this Earthworks and Siting Management Plan (ESMP) is to minimise risks to human health and the environment arising from the excavation, movement and disposal of soil material from site, and well as the placement of site facilities, and other project-related structures.

As a means of assessing environmental performance, environmental objectives, targets and performance indicators have been established for the project and are provided in the table below. These objectives and targets have been developed in consideration of requirements in the Planning Consent, contractual requirements, legislative requirements, and significant environmental aspects and impacts.

Objectives	Targets	Evidence
Gradient of access tracks that confirms the safe and convenient movement of vehicles	• No significant alterations to topography that affect the natural water flow of the area • Cut and fill methods used at all times where practical, minimise import/export of material • Minimise disturbance to the natural topography of the area where possible	Monthly reporting Construction program tracking
Minimise environmental impacts from earthworks and siting activities	• Earthworks limited to approved design footprints and construction zones • No unauthorised disturbance of land or vegetation	Incident records Monthly reporting

Objectives	Targets	Evidence
Prevent erosion, sedimentation and degradation of water quality	• 100% of disturbed areas protected by appropriate erosion and sediment controls • No uncontrolled sediment discharge from site	Incident records Monthly reporting Weekly Inspections
Prevent contamination of soil and land during earthworks	• No uncontrolled spills or releases to land • Suspected contaminated material managed in accordance with procedures	Incident records Weekly reporting
Ensure earthworks and siting comply with the Planning Consent and design requirements	• 100% compliance with approved layouts, setbacks and micro siting constraints as per design.	Construction program tracking
All cut and fill minimises disturbance to the natural topography	• Maximum practicable reuse of suitable excavation material on site • Off-site disposal limited to unsuitable or excess material only • No significant alterations to topography that affect existing topography • Earthworks limited to approved design footprint	Waste Tracking Register Monthly reporting Construction program tracking
Minimise dust, noise and nuisance impact from earthworks	• Dust controls implemented during dry or windy conditions • No substantiated complaints related to earthworks activities	Incident records Monthly reporting Complaints register
Rehabilitate and revegetation of surfaces exposed by earthworks to minimise visual impacts of cleared areas from the Project to the surrounding environment	• Cleared areas exposed by earthworks directly related to the Project are rehabilitated within 12 months of the completion of works • Vehicles and machinery do not impact revegetated areas unless directly related to Project works.	Weekly Inspections Construction Program Tracking

Objectives	Targets	Evidence
Ensure project personnel are aware and competent in their responsibilities in relation to earthworks and siting	• 100% of project personnel aware of responsibilities under this ESMP	Project induction and training register Regular Monitoring Audits
Implementation of performance outcomes, commitments and mitigation measures specified in the Planning Consent	Full compliance	Monthly reporting Audits

3. LEGISLATIVE REQUIREMENTS AND COMPLIANCE OBLIGATIONS

3.1. Legislative requirements

The following legislation and regulatory guidelines apply directly to project works.

Commonwealth

- *Biosecurity Act 2015*
- *Biosecurity Regulations 2016*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *Environment Protection and Biodiversity Conservation Regulations 2000*
- *National Environmental Protection Council Act 1994*
- *National Greenhouse and Energy Reporting Act 2007*
- National Greenhouse and Energy Reporting Regulations 2008

South Australia (SA)

- *Dangerous Substances Act 1979*
- *Dangerous Substances Regulations 2017*
- *Development Act 1993*
- *Environmental Protection Act 1993*
- *Environmental Protection Regulations 2009*
- *Landscape South Australia Act 2019*
- *Landscape South Australia Regulations 2020*
- *Local Nuisance and Litter Control Act 2016*
- *National Environment Protection (Assessment of Site Contamination) Measure 1999*
- *Native Vegetation Act 1991*
- *Native Vegetation Regulations 2017*
- *Native Parks and Wildlife Act 1972*
- National Construction Code (NCC) 2022
- *Planning, Development and Infrastructure Act 2016*
- *Planning, Development and Infrastructure Regulations 2017*
- River Murray Act 2003
- South Australian Public Health Act 2011

Industry Publications

- IECA Best Practice Erosion and Sediment Control Guidelines 2008

3.2. Compliance obligations

BMD will ensure all environmental compliance obligations are identified prior to the commencement of works onsite. These requirements shall be included in project documentation and communicated to the project team. These are listed in the table below.

Item Name	Legislation	Responsibility	Timing	Requirement
Development Approval	*Planning, Development and Infrastructure Act 2016*	Principal / Project Manager	Prior to and during construction	Comply with all conditions of approval including reserved matters
Statement of Commitments (SoC)	Incorporated under Approval Condition C1	Project Manager / Environmental Representative	Construction	Implement commitments relating to earthworks and siting management
EPA Licences and Approvals (if applicable)	*Environmental Protection Act 1993*	Project Manager / Environmental Representative	Prior to and during construction	Obtain and comply with any licences or approvals required under the Environment Protection Act 1993 for prescribed activities (e.g. concrete batching plant and transporters of Waste).
Final Layout Plan	*Planning, Development and Infrastructure Act 2016*	Principal/BMD	Prior to construction	Comply with in relation to all works
Native Vegetation Clearance Approval	*Native Vegetation Act 1991*	Principal/Project Manager	Prior to construction	Comply with approval conditions

Requirements and conditions of these licences, permits and approvals are incorporated within this ESMP.

3.3. Other requirements

Additional to the requirements identified above, the following standards, specifications, publications and codes of practice relating to environmental management will be implemented or referenced by the project during delivery.

Australian Standards

- AS/NZS ISO 14001: Environmental Management Systems – Specifications with Guidance for Use
- AS 3480.4: Methods for Sampling and Analysis of Ambient Air
- AS3580.1.1:2007 – Methods for Sampling and Analysis of Ambient Air – Guide to Siting of Monitoring Equipment
- AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids

Government Publications and Guidelines

- Code of Practise for the Building and Construction Industry (SA EPA, 1999)
- *EPA Guidelines for Stockpile Management – Waste and Waste Derived Fill*
- *EPA 080/16 Bunding and Spill Management*
- *EPA 396/10 Water quality, Dredging and Earthworks Drainage*
- *EPA guideline 080/16 - Bunding and Spill Management*
- National Environment Protection (Assessment of Contaminated Sites) Measure 1999 (Variation 2013)
- National Environment Protection (Ambient Air Quality) Measure 1998 (Variation 2015)
- National Environment Protection (Movement of Controlled Waste between States and Territories) 1998

4. RISK IDENTIFICATION AND ASSESSMENT

4.1. Environmental risk assessment

Potential environmental risks associated with project works were identified during through pre-construction environmental assessments. Risks have been identified through the BMD Risk Management standard and are outlined in the project's Risk Register. Refer to the below table for the environmental risks identified as they relate to earthworks and siting.

Aspect	Potential Impact	Management Document
Water Quality	Erosion and sedimentation from earthworks and disturbed areas reducing the water quality in local waterways. Loss of topsoil or stockpile degradation due to excessive erosion. Additional import of fill required.	Earthworks and Siting Management Plan Stormwater and Drainage Management Plan Environmental Control Plans Water Quality Sub-Plan
Contaminated Soil	Contaminated material discovered on site during excavation for infrastructure. Cross contamination while stockpiling leading to further contamination.	Waste Management Plan Earthworks and Siting Management Plan Soil and Land Sub-Plan
Natural Topography	Significant disturbance to the topography beyond required for the project resulting in vehicles not being able to move safely around site.	Earthworks and Siting Management Plan Soil and Land Sub-plan Environmental Control Plans
Cultural Heritage	Discovery of artefacts during site excavation works	Cultural Heritage (Indigenous) Sub- Plan
Environmental Nuisance	Generation of dust, noise or vibration nuisance for local community during construction	Noise and Vibration Sub-Plan Earthworks and Siting Management Plan Soil and Land Sub-Plan Construction Stakeholder and Community Engagement Plan

Aspect	Potential Impact	Management Document
Soil	Slope instability, erosion, or subsidence due to inappropriate siting or earthworks methods. Project activities impacting local water flows or contributing to excessive erosion and loss of productivity.	Earthworks and Siting Management Plan Soil and Land Sub-Plan
Visual Amenity	Visual impacts from stockpiles, cut and fill, access roads, and infrastructure siting	Earthworks and Siting Management Sub-Plan Construction Stakeholder and Community Engagement Plan

4.2. Ongoing risk assessment

Environmental risk assessment will be ongoing throughout project delivery as per BMD Risk Management standard detailed above. Emphasis will be placed on any changes to construction methodology and changes in materials or quantities used. All project staff are responsible for identifying risks and managing assessments in consultation with the project team. Forums for facilitation of risk identification include:

- Project meetings
- Toolbox meetings
- Informal site discussions.

4.3. Impact identification

Potential impacts identified through risk identification processes are addressed within this Earthworks and Siting Management Sub-Plan (ESMP). Potential impacts to the environmental values and wider rural community may result from:

- Failure to sufficiently contain unexpected finds during excavation such as contaminated soil
- Insufficient sloping of access tracks and roads leading to unsafe movement of plant or vehicles
- Loss of topsoil and erosion of sub soils resulting in reduced productivity of the land
- Major changes to the natural topography of the area resulting in severe degradation of adjacent ecosystems
- Severe degradation of visual health or amenity as a result of a lack of rehabilitation of surfaces exposed by project earthworks.

The potential impacts outlined above are typical of large-scale infrastructure construction projects and are considered manageable through the implementation of the earthworks and siting management controls and mitigation measures detailed in this ESMP.

Upon identification of additional potential impacts, this ESMP will be updated accordingly.

5. MANAGEMENT APPROACH

5.1. Site Topography and Access Track Gradient

The Project area extends approximately 15km in a north to south direction, centred on ridgelines between the townships of Palmer and Tungkillo. As a result, the natural slope and topography of the area varies greatly across the site. The construction phase will require several access tracks in order to facilitate plant and vehicle movement around the site.

To help provide safe and convenient movement of vehicles through access tracks and minimise the disturbance of the natural topography, BMD will engage with our preferred earthworks subcontractor to develop a cut and fill bulk earthmoving methodology which will be implemented during construction to help create a level surface.

The extent of cut and fill requirements for access roads will be minimised by following natural contours and tops of ridgelines where practicable. Where there are no environmental constraints and material is suitable, BMD will seek to extend access tracks for winning suitable material whilst also minimising disturbance to the overall natural topography. This will be a particular focus in the south zone based on current cut/fill estimates, refer to Section 5.4 for further detail. This method will also minimise fill import/export requirements, save cost and reduce the overall environmental impact associated with general earthworks.

The access tracks vary in width from 5.5m - 10m during the construction phase to accommodate construction activities and cranes and designed to be of acceptable gradient for South Australian Country Fire Service (CFS) vehicles. Following construction, access tracks will be retained to provide access for Wind Farm operations and maintenance requirements. Disturbed areas no longer required for construction and operational requirements will be rehabilitated. Where required, stormwater drainage, such as open swale drains of between 1-3 m in width, will be constructed adjacent to access tracks. In addition, in some sections of access track, batter slopes of between approximately 1-5 m may be required. A 10 m clearance buffer from the toe of the batter has been applied to the expected impact area for safety.

5.2. Construction Staging

Throughout construction, land disturbance will be minimised through staged clearing and progressive rehabilitation of the infrastructure activities. This approach minimises the construction risks associated with the large-scale clearing of vegetated areas and in turn reduces the potential impacts from stormwater travelling across site.

Earthworks will be staged as far as practical to minimise area of exposed soil and reduce the potential for erosion, sedimentation, and environmental harm. Staging will generally follow the order of works, with sections of earthworks cleared, excavated, and stabilised before moving on to the next area. Key elements of earthworks staging will include:

Stage / Activity	Description / Criteria	Control Measures / Notes
Prioritisation of high-risk areas	Address steep slopes, watercourses, heritage sites, and environmentally sensitive areas first.	Install temporary erosion and sediment controls before any earthworks. Use bunds, sediment fences, or diversion drains as required.
Progressive cut and fill	Excavate and place fill in smaller segments rather than large areas. Follow natural contours where possible.	Minimise fill import/export. Limit stockpile sizes where possible. Sequence works to reduce exposed soil.
Topsoil management	Strip and store topsoil for later rehabilitation. Protect soil quality and prevent contamination.	Stockpiles in designated areas and away from drainage lines. Avoid compaction, waterlogging, or wind erosion.

Coordination with access tracks and temporary works	Earthworks for tracks, laydown areas, and temporary infrastructure occur in the same staged sequence.	Stabilise disturbed areas immediately after work is finished. Progressive rehabilitation of temporary areas.
Monitoring and adaptive management	Check each stage for stability, erosion, or sediment movement.	Inspections and monitoring. Reinforce controls as needed before proceeding to the next stage.

5.3. Fill Import, Export and Stockpiling

The Project will communicate relevant waste performance information both internally and externally, as identified in its communication processes and as required by its compliance obligations. Inclusive of this requirement is to capture the amount of fill imported to site, which will be recorded in the Project's material tracking register. As per the Project's biosecurity measures, any fill brought onto site will be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material.

Excess fill that is not required for use on site will be disposed of to a licensed facility and transported in accordance with the Project's requirements. Priority should be given to reusing fill material on site where possible in the construction of access tracks or other areas that require cut and fill earthworks for stabilisation. Where this is not possible, fill material should be stockpiled in order to comply with requirement ES11, which prevents topsoil from being transported across property boundaries.

If required, fill material should be stockpiled on site pending reuse elsewhere on site. Stockpiling should not occur under the canopy of native trees or on top of native understory outside the approved area. Stockpiles should only be stored in a designated area that has been identified as suitable for fill storage. Designated stockpile locations should not:

- Be located within the floodplain of any watercourses
- Adversely impact native vegetation
- Impede the natural flow of any surface waters
- Allow sediment to re-enter any water body
- Facilitate the spread of pest plant and pathogenic material

The site is located within the River Murray system, which is of unique ecological and agricultural significance to South Australia and surrounding states. Therefore, any adverse impacts as a result of construction works should be remediated immediately and reported to the Murraylands and Riverland Landscape Board if significant.

If excavation and soil storage are to occur over longer than a one-month period, permanent ESC measures will be implemented based on guidance in the International Erosion Control Association (IECA), this may include sediment basins for long-term operation of facilities.

5.4. Cut and Fill

There is an overall deficit in material across the project at the 80% design phase as per the table below. During design development, opportunities to minimise this fill deficit are being investigated and adopted as appropriate. During delivery of the project, the team will identify areas for accessing suitable material for subgrade, pavement and backfill deficits within the project footprint. As part of the suitability assessment, the project team will consider the location, environmental and cultural heritage constraints as well as those under RM6 relating to maintaining the natural topography.

Pavement course, WTG excavation, WTG backfill, drainage trenching			
Project Area	Total Cut (m^3)	Total Fill (m^3)	Balance (m^3)
South Zone	222,622	237,549	-14,926 (fill deficit)
North Zone	278,280	291,603	-13,323 (fill deficit)
Total			-28,249 (fill deficit)
***Note all quantities do not consider bulking factors**			

5.5. Micro-siting of Permanent and Temporary Infrastructure

Key siting requirements for permanent infrastructure have been verified by Tilt's designer to ensure compliance with all relevant regulations listed in these commitments including appropriate setbacks from dwellings and compliance with noise and shadow flicker requirements.

Any micro-siting of temporary infrastructure will ensure compliance with the Development Approval, including appropriate setbacks from dwellings and environmental features of the Project Area. The construction phase of the project will require the construction of one main temporary construction compound, two temporary substation compounds and up to five satellite temporary construction laydown areas. Temporary access roads will also be required in order to facilitate site deliveries, materials and vehicles throughout the Project life cycle. Consideration will be given to the amount of clearing and earthworks required for temporary infrastructure installation and minimised to the extent practicable. Access tracks will be constructed using cut and fill methods in order to minimise both the scale of earthworks required and the disruptions to the natural topography of the area. Where possible, the project design has sought to utilise existing access tracks in order to minimise disturbance to the topography of the area.

Project related infrastructure will be sited in accordance with the following Planning Consent conditions:

- The development authorisation granted herein shall be undertaken in accordance with the stamped approved plans, drawings, specifications and other documents submitted to the State Planning Commission, except where varied by conditions below (if any) (Condition 1).
- Stockpiled materials, including cleared vegetation and excavated soil is not be placed under native trees or on top of native understorey outside the approved area (Condition 5).
- Construction vehicles, equipment or materials are not to be stored or placed on top of native vegetation outside the approved clearance area (Condition 6).
- Ensure at least 200 metres separation between any concrete batching plant and their nearest residential dwellings (Condition 12).
- No permanent above ground infrastructure (including poles, fencing or signage) shall be installed within 6 metres of the Pipeline (Condition 14).
- All wind turbines to be installed more than 400m away from the PCA pipeline (Condition 22).
- The final design of the transmission line shall be designed to minimise its impact on the arterial road network. The department shall be consulted about the final alignment and placement of any new poles within the road reserve of DIT roads. The requirements for the installation of any crash protection shall be reviewed by DIT in accordance with Austroads Guide to Road Design Part 6: Roadside Design, Safety and Barriers (Condition 25).
- All power lines over arterial roads shall provide a minimum vertical clearance of 7.5 metres (Condition 26).
- All underground cabling (including boring) on or adjacent arterial roads shall be deigned to minimise its impact on the arterial road network (Condition 27).

- All access points serving the temporary construction facilities (including but not limited to, workers compounds and batching facilities) located on, or requiring access to, arterial roads shall be located to the satisfaction of DIT to ensure road safety is maximised during the construction phase of the project. All temporary access points shall be decommissioned to the satisfaction of DIT requirements at the applicant's cost (Condition 28).
- All road works deemed to be required to facilitate safe access shall be designed and constructed to comply with Austroads Guides, Australian Standards and to DIT Master Specifications, with all costs (including, but not limited to, design, construction, project management and any changes to road drainage) to be borne by the applicant (Condition 29).
- Any modification to road side drainage as a result of a temporary access, or modifying an existing access on an arterial road shall be suitably designed to the satisfaction of DIT in order to maximise road safety on the adjacent arterial road network (Condition 32).
- During works or construction activities associated with the development, the subject land must be managed in a manner as to prevent erosion and pollution of the site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to ensure no pollutants (including excavation or fill material) enter the River Murray system (Condition 34).
- Any fill material brought to the site must be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material (Condition 35).
- Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not: be located with the River Murray 1956 flood extent; impede the natural flow of any surface waters; allow sediment to enter any water body; adversely impact native vegetation; or facilitate the spread of pest plant and pathogenic materials (Condition 36).
- All wind turbines will be positioned such that no portion of the structure, including blades, overhangs into adjacent parcels of Crown Land (Condition 37).

5.6. Final Layout Plans

The Final Layout Plan (prepared to address RM1) provides an overview of the turbine locations, final colour selection and ancillary infrastructure including the overhead powerlines, refer to Attachment 3.

5.7. Environmental Control Plans

The Project traverses environmentally and socially sensitive areas/sites. To assist pre-construction planning and on-site construction management, these site constraints are consolidated on a series of map-based sheets that extend the length of the Project. Environmental control plans (ECPs) include information pertaining to:

- noise sensitive receivers, e.g. residential dwellings, educational institutions;
- flora features, including threatened species and endangered ecological communities;
- Aboriginal and non-Aboriginal heritage sites, including items, places, objects and sites;
- waterways; and
- erosion and sediment controls.

They are produced for construction stages from initial vegetation clearing to rehabilitation, when erosion and sediment controls are no longer required and are removed. These will be developed and implemented prior to commencing activities at all works areas where there is a risk of erosion and sediment loss. ECP's will be developed by the Environment Site Representative in consultation with the superintendent, site engineers, foreman and other site personnel, as required. They will be modified over time to reflect the changing site conditions.

The initial ECP's will be developed in consultation with Tilt Renewables. A sample Environmental Control Plan is in Attachment 2.

5.8. Rehabilitation

Rehabilitation of disturbed areas not required for the ongoing operation of the Project will occur as soon as possible following disturbance activities or as an area is no longer required. Rehabilitated areas will be monitored biannually by the Contractor and/or Proponent until relevant success criteria have been met, which are listed in the following table:

Aspect	Rehabilitation Criteria
Landform	No significant signs of erosion are present that would constitute a safety hazard or compromise the end land use. Surface layer to be free of any hazardous materials. All infrastructure and equipment, other than access roads that may be used in the future, are removed unless otherwise agreed. Final landform is compatible with the surrounding topography.
Soil	Topsoil/organic material or a suitable alternative has been spread uniformly over the revegetation area and catchment stabilisation achieved as per the contract.
Revegetation	Cleared areas that no longer require project works will be rehabilitated at a suitable time within 12 months. Previously cleared areas are not subject to significant scouring or erosion from stormwater. Weed and pest species are not prevalent in areas that have been rehabilitated.

The rehabilitation of the site will be completed in multiple stages, including post-construction, operation and decommission of the Project. Decommissioning of the Project will require the removal of surface facilities and services along with site remediation and is not part of the scope of this management plan.

6. ROLES AND RESPONSIBILITIES

Refer to CEMP Section 6.1 for Project Organisation Chart.

6.1. Project Manager

- Familiarising themselves with their responsibilities within this ESMP and BMD's environmental management system.
- Ensuring the project is compliant with the requirements detailed in this ESMP and relevant legislation.
- Ensuring earthworks and siting requirements are fully implemented and not secondary to construction activities.
- Providing adequate resources (personnel, financial and equipment) to support effective earthworks management.
- Reviewing and authorising earthworks and siting management procedures, controls and revisions to this ESMP.
- Monitoring compliance with earthworks and siting management requirements, schedules and targets.
- Ensuring earthworks and siting risks are identified, assessed and managed in accordance with the Project risk management framework.
- Ensuring subcontractors submit appropriate Work Method Statements (WMS) and environmental documentation addressing earthworks management prior to commencement.
- Ensuring subcontractor compliance with the requirements of this ESMP and other relevant documentation.

- Reviewing earthworks and siting-related incidents, hazards and near misses and ensuring corrective actions are implemented within agreed timeframes.
- Reporting earthworks volumes and statistics as required.
- Upholding an active interest in workplace environmental and earthworks management issues.

6.2. Field Supervision

- Implementing earthworks and siting management requirements and control measures in accordance with this ESMP.
- Ensuring all relevant controls and containment measures are in place and maintained for earthworks on the project.
- Conducting routine inspections of earthworks areas and coordinating corrective actions as required.
- Ensuring all site personnel and subcontractors are aware of earthworks and siting management requirements and controls.
- Ensuring required approvals are in place prior to commencing earthworks activities on site.
- Ensuring subcontractors comply with BMD earthworks management requirements and taking immediate action where non-compliance is identified.
- Reporting earthworks-related incidents, contamination or non-conformances to the Environmental Representative or Project Manager.
- Participating in toolbox talks and pre-start meetings to communicate earthworks and siting management requirements.
- Upholding an active interest in workplace earthworks, siting and environmental management.

6.3. Project Engineer

- Familiarising themselves with their responsibilities under this ESMP and BMD's environmental management system.
- Ensuring earthworks and siting requirements are considered in construction planning and sequencing of works.
- Developing, reviewing and approving WMS that address general earthworks, spoil movement, storage and siting.
- Reviewing subcontractor WMS to ensure that earthworks and siting risks and controls are adequately addressed.
- Undertaking risk assessments where changes to activities may affect earthworks or siting management.
- Liaising with the Environmental Representative on earthworks-related matters, including classification and disposal.
- Conducting inspections to identify earthworks-related environmental risks or non-conformances.
- Raising earthworks and siting management issues or concerns with the Environmental Representative or Project Manager.

6.4. Environmental Representative (or delegate)

- Establishing, maintaining and reviewing this ESMP and associated documentation.
- Implementing earthworks-related monitoring, inspection and reporting requirements.
- Providing earthworks and siting management training and awareness to personnel, subcontractors and visitors.
- Coordinating all approvals, permits and licences relevant to earthworks and siting.
- Liaising with the South Australian EPA, regulators and environmental consultants on issues relating to earthworks and siting.
- Maintaining records of earthworks and siting incidents, complaints and corrective actions.
- Monitoring compliance with legislation, policies and standards and updating this ESMP as required.

- Assisting subcontractors with understanding and applying BMD earthworks and siting management requirements.
- Participating in audits, inspections and reviews related to earthworks and siting management.
- Advising the Project Manager of any earthworks or siting management issues that may pose a risk to the environment, personnel or compliance obligations.

6.5. All site personnel

- Familiarising themselves with the requirements of this ESMP and site earthworks management procedures.
- Attending site inductions, pre-start meetings and toolbox talks addressing earthworks and siting management.
- Complying with site earthworks and siting requirements.
- Using controls and mitigation measures identified in this ESMP.
- Preventing hazardous soil placement or cross-contamination and maintaining tidy work areas.
- Stopping work and notifying supervision if earthworks or siting activities pose a risk to the environment.
- Reporting earthworks-related hazards, incidents and near misses immediately.
- Actively participating in earthworks and siting management reviews and continuous improvement initiatives.
- Upholding an active interest in workplace earthworks, siting and environmental management.

7. MANAGEMENT AND MITIGATION MEASURES

Specific measures and requirements to meet the objectives of this sub-plan and to manage construction impacts are outlined in the table below, with more detail provided in Section 5. These measures have been developed in line with the requirements in the Project Approvals (refer to Attachment 1 Compliance Matrix).

Where a measure has been duplicated across multiple sub plans, the measure number and plan reference identification are in brackets.

ID	Measure / Requirement	Responsibility	Timing	Evidence
ES01	Dust suppression will be undertaken through construction of the Project (e.g. use of water carts and water sprays as appropriate during dry periods) to mitigate dust nuisance with particular emphasis on locations of nearby dwellings and sensitive land uses.	Field Supervision Environment Representative	Construction	Work Method Statement reviews Site inspections
ES02	The Contractor will undertake daily visual inspections during construction to monitor dust generating activities and as required for operations based on the occurrence of potential dust generating activities.	Field Supervision Environment Representative All Site Personnel	Construction	Site inspections
ES03	Construction vehicles, equipment or materials are not to be stored or placed on top of native vegetation outside the approved clearance area.	Field Supervision Environment Representative	Construction	Site Inspections Environmental Control Plan (ECPs)
ES04	Dust generation activities will be conducted in favourable wind conditions where possible.	Field Supervision Environment Representative All Site Personnel	Construction	Pre-start meeting Site Inspections
ES05	Infrastructure activities will be monitored by the Contractor for changes in dust levels and weather condition – activities must cease if dust levels threaten to cause environmental nuisance and cannot be effectively controlled.	Field Supervision Environment Representative	Construction	Pre-start meeting Site Inspections Corrective action records
ES06	Land disturbance will be minimised through staged clearing and progressive rehabilitation of the infrastructure activities.	Field Supervision Environment Representative	Construction and construction completion	Site Inspections Work Method Statement reviews Photographs
ES07	Unnecessary movement and handling of excess materials will be minimised by the Contractor as far as practicable.	Field Supervision Environment Representative	Construction	Work Method Statement reviews Environmental Control Plan (ECPs)

ID	Measure / Requirement	Responsibility	Timing	Evidence
ES08	The height and orientation of stockpiles will be managed by the Contractor to minimise dust generation via wetting and compaction. If this is not possible, alternative controls will be implemented which may include fencing, covering, seeding as required to minimise dust generation.	Field Supervision Environment Representative	Construction	Site Inspections
ES09	If excavation and soil storage are to occur over longer than a one-month period, permanent ESC measures may be implemented by the Contractor based on guidance in the International Erosion Control Association, this may include sediment basins for long-term operation of facilities.	Field Supervision Environment Representative	Construction / as required	Site Inspections Environmental Control Plan (ECPs)
ES10 (SD8) (WM10)	Where relevant, the stockpiling of soil and materials will follow requirements of the SA EPA Guideline for Stockpile Management (dated October 2020), or most recent version, including: • Any materials with a potential to produce leachate and contaminated runoff will be stored in a sealed and bunded area. • Limiting stockpile height to within 3-5 m where possible depending on the risks posed by the specific material type and location • Materials must be stored away from surface watercourses, flood zones and groundwater recharge areas to prevent environmental harm to water. • Locating designated fill stockpiles away from vegetation and drainage lines, with a minimum of 10 m separation from drainage lines and stormwater drains. • No stockpiling within the drip lines of trees to minimise compaction of the root zones. • Maintaining separate stockpiles for different materials (e.g. separating topsoil for respreading as part of reinstatement).	Field Supervision Environment Representative	Construction	Site Inspections Environmental Control Plan (ECPs)
ES11 (SD9)	Topsoil is not permitted to be transported across property boundaries.	Field Supervision Environment Representative	Construction	Site Inspections Toolbox talk records
ES12 (SD10)	Disturbed areas will be stabilised and reinstated progressively by the Contractor as part of the construction works to meet specific revegetation success criteria	Field Supervision Environment Representative	Construction / post-construction	Reinstatement reports Photos Monitoring records

ID	Measure / Requirement	Responsibility	Timing	Evidence
ES13 (SD13)	A site-specific environmental management plan will be developed by the Contractor for this activity, including a detailed site layout for the concrete batching, and specific management measures, considering: • Siting of any temporary concrete batching plants outside of potential flood affected areas. • Maintaining the quality of local water resources by incorporating a wastewater management system and effectively operate the system. • The wastewater management system will be regularly inspected and maintained. • The wastewater collection and recycling system will be designed to collect contaminated water from relevant concrete batching systems and areas associated with the batching plant operation. • Wastewater generated at the premises will not be discharged into any local waterways or onto land in a place from which it is reasonably likely to enter any waters. • Concrete agitator bowls and chutes will not be washed out to the stormwater system or roadways.	Environment Representative	Pre-construction	Concrete Batching Management Plan Wastewater Management Plan Environmental Control Plan (ECPs)
ES14	Rehabilitation of disturbed areas not required for the ongoing operation of the Project will occur as soon as possible (within 12 months) following disturbance activities or as an area is no longer required.	Field Supervision Environmental Representative	Construction / post-construction	Reinstatement reports Photos Site inspections
ES15	All vehicles, equipment and work activities will be restricted to designated work areas.	Field Supervision	Construction	Site inspections Toolbox talk records
ES16	On identification of any suspected contaminated soil/fill, this material will be stored on impervious material (e.g. HPDE sheet) and covered to prevent rain or wind mobilising material.	Field Supervision Environmental Representative	As required	Site inspections Photos
ES17	If contaminated soil is suspected, suitable testing from a NATA accredited laboratory will be conducted by the Contractor.	Environmental Representative	As required	Laboratory test results Sampling records
ES18	Stockpiling of contaminated soils cannot remain on-site long-term and should be removed in the shortest period possible, following excavation	Field Supervision Environmental Representative	As required	Waste Tracking Register Site inspections

ID	Measure / Requirement	Responsibility	Timing	Evidence
ES19	If soil is to be temporarily stored on-site, establish designated and cleared marked stockpile storage areas away from native vegetation and drainage lines.	Field Supervision Environmental Representative	Construction	Site inspections Environmental Control Plan (ECPs)
ES20	If adverse weather conditions are predicted, contaminated stockpiles must be covered with geotextiles, stabilisation matting or other suitable material.	Field Supervision Environmental Representative	As required	Site inspections Photos
ES21	Turbines will be located within the approved micro siting areas for turbines and other infrastructure. Locations for micro siting of permanent infrastructure have been verified by Tilt's designer against approval requirements to ensure compliance with all relevant regulations listed in these commitments including appropriate setbacks from dwellings and compliance with noise and shadow flicker requirements.	Tilt and its designers	Detailed Design	Final layout plan as required by Reserved Matter 1 of Planning Consent
ES22	The extent of cut and fill requirements for access roads will be minimized by following natural contours and tops of ridgelines where practicable.	Field Supervision Project Engineer	Pre-Construction / Construction	Design plans Site inspections
ES23	As far as possible road materials will be sourced locally by the Contractor to blend with existing landscape.	Field Supervision Project Manager Environment Representative	Construction	Material tracking sheets Photos Inspection reports
ES24	Access tracks and temporary works areas will be staged and sequenced to minimise the extent and duration of ground disturbance.	Field Supervision Project Engineer	Construction	Construction methodology Site inspections

8. COMPLIANCE MANAGEMENT

8.1. Training and Awareness

Personnel will receive training appropriate to their role in earthworks and siting management on the project. Ongoing toolbox talks covering the requirements for management of earthworks and siting will be used to raise awareness to the wider project team. Timing and content of such meetings will be aligned with project works programme and the significant risks at that time.

The site induction will be utilised to train all staff in the general requirements of earthworks and siting management. Specific environmental training courses may also be facilitated as required for appropriate personnel.

Further details regarding staff induction and training are outlined in Section 10 of the CEMP.

8.2. Monitoring, Inspections and Auditing

8.2.1. Monitoring and inspection

Regular site inspections and visual monitoring of construction activities and earthworks / siting areas will be undertaken to ensure the environmental controls detailed within this ESMP are being implemented. Environmental monitoring requirements will be carried out as per project requirements and specifications.

Project environmental monitoring requirements shall be summarised on the BMD Compliance Obligations Register.

8.2.2. Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub-plan, Planning Consent and other relevant licenses, and guidelines. These audits will be undertaken at planned intervals to provide information on whether the Project:

- Is meeting its compliance obligations
- Conforms to this sub-plan
- Determines if this sub-plan is effectively implemented and maintained.

The approach to audits is outlined further in Section 8.3 of the CEMP.

8.2.3. Reporting

The Project will communicate relevant earthworks performance both internally and externally, as identified in its communication processes and as required by its compliance obligations. Project earthworks volume, type and movements will be captured and provided to the principal as required.

8.3. Environmental Incidents

The procedure for the management of environmental incidents will be undertaken in accordance with Section 7 of the CEMP.

All environmental incidents are to be investigated, reported, documented, actioned and closed out as per the details provided in the CEMP.

Examples of incidents and non-compliances as they relate to earthworks and siting management may typically include:

- Unexpected soil contamination finds

- Stockpiling that facilitates the spread of weeds or other pathogens
- Significant alteration to the natural topography of an area
- Stockpiling in the vicinity of drains or waterways
- Revegetation not occurring within the required 12-month timeframe
- Topsoil being placed on native vegetation
- Placement of temporary site structure that impedes the health and wellbeing of local residents or communities

Following an incident, corrective and preventative actions will be identified, assigned to the appropriate person/s and closed out in accordance with the appropriate time frames set in response to the circumstances.

8.4. Non-Conformance Reports (NCRs)

Non-conformance with any environmental project requirement will be managed and reported on in accordance with the BMD Incident and Accident Management Standard. In the event of any non-conformance with any regulatory or other compliance obligation, as set out the ESMP, corrective action/s shall be raised. All corrective actions shall be entered into the BMD Corrective or Improvement Actions Database.

8.5. Environmental Complaints

All complaints made by the community and stakeholders will be managed in accordance with the Complaints Management Plan.

9. REVIEW AND IMPROVEMENT

This ESMP, its operation and implementation, will be periodically reviewed throughout the construction of the Project to ensure it remains current, effective and responsive. A formal review of the ESMP will be undertaken at least once every 6 months. Other triggers for review may include:

- Corrective or Preventative Actions arising from incidents, near issues or hazard reporting;
- Changes to relevant legislative, regulatory, standards or compliance obligations;
- Significant changes to construction activities or staging;
- Request from regulatory authority;
- Significant changes to site conditions or surrounding land use;
- Updates to recognised environmental management best practise; or
- The identification of new or increased risks.

Where this review leads to a revision of the ESMP, the revised ESMP will be submitted to SPC for approval if required.

9.1. Minor amendments to ESMP

The Environmental Representative/Project Manager may consider minor amendments to be made to the ESMP which will be approved by the Principal. ‘Minor Amendments’ are defined as those that involve updating a document or are of an administrative nature and do not increase impacts to the environment or nearby dwellings, and may typically include those that:

- Are editorial in nature e.g. staff and agency/authority name changes;
- Do not increase the magnitude of impacts on the environment when considered individually or cumulatively;
- Do not compromise the ability of the Project to meet approval conditions or legislative requirements;
- As required as a result of monitoring, inspection and audits results;
- Result from consideration of recent and relevant incidents and any lessons learnt;
- Are required because of any new regulatory obligations;

- Are identified as needed based on a review of the effectiveness of environmental controls;
- Are required because of changes in operational needs such as resourcing; and/or
- Are required because of feedback from regulators and other relevant stakeholders.

Where the ESMP is revised, the updated ESMP will be provided to all relevant site personnel and stakeholders and provided to the relevant authorities, as appropriate.

10. ATTACHMENT 1 – COMPLIANCE MATRIX

Project Approval Requirements

Condition Number	Condition	Document Reference	How Addressed
Reserved Matters			
RM6	A final Earthworks Plan and Siting Plan shall be prepared and submitted to the satisfaction of the State Planning Commission, detailing the following: a) the final layout plan(s) for each stage from Reserved Matter 1; b) all cut and fill that minimises disturbance to the natural topography; c) rehabilitation and revegetation of surfaces exposed by earthworks to minimise visual impacts; and d) gradient(s) of access tracks that confirms the safe and convenient movement of vehicles.	This Plan	Final layout plans, cut and fill, rehabilitation and revegetation, and access tracks are detailed within this Plan.
Conditions			
C1	The development authorisation granted herein shall be undertaken in accordance with the stamped approved plans, drawings, specifications and other documents submitted to the State Planning Commission, except where varied by conditions below (if any).	This Plan	This ESMP has been prepared to align with the approved project documentation, including the Statement of Commitments and Project Approval conditions. Compliance is addressed through implementation of this plan.
C5	Stockpiled materials, including cleared vegetation and excavated soil is not to be placed under native trees or on top of native understorey outside the approved area.	Section 5 Section 7 ECPs	Stockpile management is detailed in Sections 5 and 7.
C6	Construction vehicles, equipment or materials are not to be stored or placed on top of native vegetation outside the approved clearance area.	Section 7	Measures to be implemented are documented in Section 7
C12	Ensure at least 200 metres separation between any concrete batching plant and their nearest residential dwellings.	Section 5.4	Included as a key criterion for micro siting in Section 5.4.

Condition Number	Condition	Document Reference	How Addressed
C14	No permanent above ground infrastructure (including poles, fencing or signage) shall be installed within 6 metres of the Pipeline 1. crossing the Pipeline at right-angles, where practicable 2. installed above the Pipeline, where practicable 3. a minimum of 500mm vertical separation between the service and the Pipeline; a minimum of 1000mm horizontal separation between parallel services and the Pipeline.	Section 5.4	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).
C22	All wind turbines to be installed more than 400m away from the PCA pipeline.	Section 5.4	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).
C25	The final design of the transmission line shall be designed to minimise its impact on the arterial road network. The department shall be consulted about the final alignment and placement of any new poles within the road reserve of DIT roads. The requirement for the installation of any crash protection shall be reviewed by DIT in accordance with Austroads Guide to Road Design Part 6: Roadside Design, Safety and Barriers.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval). Traffic Management Plan
C26	All power lines over arterial roads shall provide a minimum vertical clearance of 7.5 metres.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).
C27	All underground cabling (including boring) on or adjacent arterial roads shall be designed to minimise its impact on the arterial road network	Design drawings Addressed in Traffic Management Plan	Traffic Management Plan
C28	All access points serving the temporary construction facilities (including but not limited to, workers compounds and batching facilities) located on, or requiring access to, arterial roads shall be located to the satisfaction of DIT	Addressed in Traffic Management Plan	Traffic Management Plan

Condition Number	Condition	Document Reference	How Addressed
	to ensure road safety is maximised during the construction phase of the project. All temporary access points shall be decommissioned to the satisfaction of DIT requirements at the applicant's cost.		
C29	All road works deemed to be required to facilitate safe access shall be designed and constructed to comply with Austroads Guides, Australian Standards and to DIT Master Specifications, with all costs (including, but not limited to, design, construction, project management and any changes to road drainage) to be borne by the applicant.	Addressed in the Traffic Management Plan and design drawings	Traffic Management Plan
C32	Any modification to road side drainage as a result of a temporary access, or modifying an existing access on an arterial road shall be suitably designed to the satisfaction of DIT in order to maximise road safety on the adjacent arterial road network.	Addressed in the Traffic Management Plan and design drawings	Traffic Management Plan
C34	During works or construction activities associated with the development, the subject land must be managed in a manner as to prevent erosion and pollution of the site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to ensure no pollutants (including excavation or fill material) enter the River Murray system.	Section 5.3 Section 7	Management of earthworks and associated materials is discussed in Section 5.3. Measures to be implemented are documented in Section 7
C35	Any fill material brought to the site must be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material.	Section 5.3	Fill import is discussed in Section 5.3.
C36	Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not: • be located within the River Murray 1956 flood extent; • impede the natural flow of any surface waters; • allow sediment to enter any water body; • adversely impact native vegetation; • facilitate the spread of pest plant and pathogenic material.	Section 5.3	Measures to be implemented are documented in Section 7

Condition Number	Condition	Document Reference	How Addressed
C37	Wind turbines must be positioned such that no portion of the structure, including blades, overhang into adjacent parcels of Crown land.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).

Statement of Commitments

Number	Commitment	Document Reference	How Addressed
4.1 Final Layout Plan			
1	A final layout plan associated with any stage of the project will be prepared and submitted to the Mid Murray Council prior to construction of that stage.	Section 5.2	-
3	The final layout plan will ensure that no blade overhang occurs on Crown Land.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).
4.4 Landscape and Visual Impact Management			
3	The extent of cut and fill requirements for access roads will be minimized by following natural contours and tops of ridgelines where practicable.	Section 5.1 Section 7	Section 5.1 discusses recommendations / requirements for cut and fill. Measures to be implemented are documented in Section 7.
4	As far as possible road materials will be sourced locally to blend with existing landscape.	Section 7	Measures to be implemented are documented in Section 7.
7	Turbines will be located within the approved micro siting areas for turbines and other infrastructure. Any micro siting of turbines will ensure compliance with all relevant regulations listed in these commitments including appropriate setbacks from dwellings and compliance with noise and shadow flicker requirements.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).

Number	Commitment	Document Reference	How Addressed
4.5 Flora and Fauna Impact Management			
7	Existing access tracks will be used where possible to minimise additional disturbance.	Section 5.4	Included as a key criterion for micro siting in Section 5.4.
8	BMD will minimise clearance of native vegetation where possible throughout delivery.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval). Minimise clearance of native vegetation where possible throughout delivery.
9	Additional detailed micro-siting in Area C will be undertaken at the detailed layout design stage to incorporate, where practical, alternative access routes in order to minimise impact on Peppermint Box trees.	Addressed in Final Layout Plan (Reserved Matter 1 of Development Approval)	Comply with the Final Layout Plan (Reserved Matter 1 of Development Approval).
4.7 Cultural Heritage Impact Management			
8	Existing access tracks will be utilised as much as possible and disturbance or development in the gullies between hills will be avoided. Wherever possible, access tracks will keep to the crest or upper slopes of the hills within the Project Area.	Section 5.4	Included as a key criterion for micro siting in Section 5.4.
9	Impacts on the dry-stone walls will be avoided where possible. If impacts cannot be avoided, these impacts will be minimised or mitigated in consultation with the Dry-Stone Wall Association (e.g. by using damaged areas, minimising the access road width) and these measures will be reflected in a management plan as part of the CEMP.	Section 5.4	Included as a key criterion for micro siting in Section 5.4.
4.9 Construction, Civil, Geology, Geotechnical, Hydrology Impact Management			
1	During construction activities the subject land must be managed in a manner as to prevent erosion and pollution of the subject site and the environment, including keeping the area in a tidy state and ensuring any waste materials are appropriately contained to ensure no pollutants (including	Section 5.3 Section 7	Management of earthworks and associated materials is discussed in Section 5.3. Measures to be implemented are documented in Section 7

Number	Commitment	Document Reference	How Addressed
	excavation or fill material) enter the River Murray system.		
2	Any fill material brought to development sites must be clean and not contaminated by construction or demolition debris, industrial or chemical matter, or pest plant or pathogenic material.	Section 5.3	Fill import is discussed in Section 5.3.
3	Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not:	Section 7	Measures to be implemented are documented in Section 7
a)	be located within the floodplain of any watercourses:		
b)	adversely impact native vegetation;		
c)	impede the natural flow of any surface waters;		
d)	allow sediment to re-enter any water body;		
e)	facilitate the spread of pest plant and pathogenic material.		

Native Vegetation Clearance Approval

Condition Number	Condition	Document Reference	How Addressed
NVC11	With respect to areas that are to be rehabilitated within 3 years of clearance, the applicant shall: a. Stockpile vegetative material and topsoil removed in accordance with this approval in an area that has already been cleared or is void of native vegetation; b. At an optimal time within 12 months following completion of the use of any area cleared in accordance with this approval, revegetate the areas that are not required to be kept cleared of vegetation for ongoing operations or maintenance activities, by: I. ripping the ground on the contour to remove soil compaction;	Section 5.2 Section 5.3 Section 5.5 Section 5.6	Management and siting of earthworks is discussed in Section 5. Measures to be implemented in Section 7.

Condition Number	Condition	Document Reference	How Addressed
	II. laying the vegetative material and topsoil retained in accordance with this condition, on the cleared area(s) to encourage natural regeneration of native grasses; III. conducting a weed control program for a minimum of 2 years following the revegetation of the land; and IV. seeding the cleared areas with seed of local native grasses;		
NVC15	Non-compliance with any of the conditions of this approval must be reported to the NVC as soon as practical after the non-compliance being detected, but must be within a maximum of seven days. The report must include details of the nature of the breach, the location and extent of the breach and the actions taken and associated timing for completion of those actions, to address the breach;	Section 8.2 Section 8.4 Section 8.5	Inspections, auditing and non-conformances are discussed in Section 8

11. ATTACHMENT 2 – EXAMPLE ENVIRONMENTAL CONTROL PLAN

SITE ENVIRONMENTAL CONTROL PLAN - *SAMPLE*

STAGE XX - XXXXXXXX

SCOPE OF WORKS

- Vegetation clearing
- Installation of No-Go Zone fencing and signage
- Site establishment works

Refer to Construction Environmental Management Plan for further environmental management information.

ENVIRONMENTAL AWARENESS

Site personnel associated with scope of works to have completed project induction and be toolboxed on requirements outlined in this Site Environmental Control Plan before commencing works.

KEY RISKS	
Pollution of waterways	Loss of amenity due to noise
Non-approved removal of trees that are planned to be retained	Unknown finds of cultural heritage during works
Injury or death to fauna during works	Non-compliance with regulatory approvals/permits/licenses
Tracking of sediment and silt onto neighbouring roadways	Spill of fuels and/or chemicals
Litter dispersal into neighbouring areas	Excavation of contaminated soils

APPROVALS	
Approval	**Detail**
Development Approval	Comply with all conditions of approval including Reserved Matters
Statement of Commitments	Implement commitments during construction
MACAI Heritage Agreement	Implement controls as per agreement
PAC Heritage Agreement	Implement controls as per agreement.
Water Affecting Activities permit	Permit to construct and work over a water way
Wildlife handling permit (to be held by ecologist)	In the event that works will require the removal or destruction of wildlife.
Noxious weed permit	A permit is required to remove soil, sand, gravel or stone that contains or is likely to contain any part of a noxious weed
Native Vegetation Clearance Approval	Comply with approval conditions

Role	SITE RESPONSIBILITY
Project Manager	Ensuring the project is compliant with the requirements of the relevant Environmental Acts and Regulations and Planning Consent
Field Supervision	Fielding implementation of environmental requirements and control measures. Ensuring works are delivered in accordance with project environmental objectives.
Project Engineer	Planning and risk assessment of works delivery activities in accordance with project environmental objectives.
Environmental Representative	Establishing and maintaining the environmental management plans and documentation.
All Site Personnel	Familiarising themselves with their responsibilities within this plan and BMD's environmental management systems.

	Complying with General Environmental Duty obligations.

Responsibilities	STORMWATER AND DRAINAGE
Environmental Representative	Water quality monitoring program to be implemented during project delivery, as per project specifications
Field Supervision	Potentially harmful substances not to be stored or handled within 50m of an existing water body or drainage channel.
Field Supervision	All hazardous substances will be stored in bunded areas as per the applicable Australian Standard
Field Supervision	Controls to be installed as indicated on this SECP
Environmental Representative	Water to be discharged shall be tested and results recorded on the BMD Water Discharge Permit Form. This form shall be signed off by the site supervisor prior to discharge.
Environmental Representative	Water quality monitoring points will be located in relevant upstream and downstream areas of the worksite.
Field Supervision	Concrete washout shall be undertaken in dedicated washout pits or washout bags. Pits will be lined with plastic or another impermeable material.

Responsibilities	AIR QUALITY AND DUST
Field Supervision	Haul roads will be kept damp or binders/polymers will be employed and street sweepers will be utilised to control dust.
Field Supervision and Environmental Representative	Dust/emission levels will be assessed visually, and mitigation will be assessed as being necessary whenever dust generation has been visually identified.
Field Supervision	In any area where dust generation is on-going, water application will be continued throughout each workday.
All Site Personnel	All vehicles hauling materials will be adequately covered.
Field Supervision	Wherever possible, work activities likely to generate excessive dust will be programmed during mornings when wind speeds are generally lower.

Responsibilities	WASTE
Field Supervision	All waste concrete will be disposed of appropriately in either concrete washout bags, concrete washout pits or similar.
All Site Personnel	Housekeeping in site work areas will be regularly undertaken to ensure no waste materials cause littering.
All Site Personnel	Works undertaken in or near waterways will be cleaned up daily to prevent materials entering waterway in the event of rainfall.
Field Supervision	Waste and recycling materials shall be transported to appropriately licenced facilities for disposal or reuse.
Environmental Representative	Regulated waste materials shall be tracked utilising waste tracking system with a record kept by the project as per regulatory requirements.
Project Engineer	Unsuitable or contaminated soil material shall be managed as per the project's Site Contamination, Haz Chem and Spill Sub-Plan.

Responsibilities	SITE CONTAMINATION, HAZ CHEM & SPILLS
Field Supervision	Refuelling of any vehicles or plant within the worksite will be performed as per Hazardous Chemicals COP.
Field Supervision	Any refuelling of small equipment to be carried out within the worksite must not occur without a fully stocked spill kit available.

Field Supervision	Fuel or chemical storage facilities required on site will be self-bunded as per requirements of AS1940 - 2004
Environmental Representative	Spill Kits will be regularly audited to ensure all are adequately stocked.
Field Supervision	Potentially harmful substances not to be stored or handled within 50m of existing water bodies or drainage channels

Responsibilities	FLORA AND FAUNA
Field Supervision and Environmental Representative	Establish the area or trees approved for clearance with markings prior to clearing commencing and remain visible for the period in which clearance is occurring. Clearance of Tree 29 to be confined to maximum of 30% of tree canopy. Minimise impact where possible to significant and mature vegetation and avoid impacts to Peppermint Box grassy woodlands. Pre-clearance by ecologist required prior to removing potentially habitat containing trees.
Project Engineer and Environmental Representative	BMD Ground Disturbance Permit must be completed and approved prior to any soil disturbance works.
Field Supervision	Vegetation to be protected shall be setup as 'No Go Zones'
All Site Personnel	Project staff and contractors must not enter into a no-go zone or perform works within proximity to the no-go zone that have the potential to have an impact of the protected flora or fauna
All Site Personnel	Notify supervisor or enviro rep immediately if a threat to an animal is evident on-site.
All Site Personnel	Notify Foreman immediately of damage to No-Go Zone fencing or signage
All Site Personnel	Notify Foreman or Enviro Site Representative of any unapproved land disturbance immediately.

Responsibilities	HERITAGE
All Site Personnel	Undertake works as per MACAI Heritage Agreement and PAC Heritage Agreement. All personnel will attend a heritage induction prior to commencing works. Refer to Heritage no go zones on SECP. Cultural Heritage Monitoring will be completed for ground disturbance works as required by the MACAI and PAC Heritage Agreements.
Engineer and Environmental Representative	BMD Ground Disturbance Permit must be completed and approved prior to any soil disturbance works.
All Site Personnel	Contact supervisor and enviro rep immediately if a; suspected item of heritage significance has been discovered. Cease works in the vicinity of any uncovered items identified as potentially significant, until a representative from the Traditional Owner group and/or a qualified consultant has assessed the site.

Responsibilities	BIOSECURITY
All Site Personnel	Clean vehicles when moving between land parcels and complete Weed Hygiene Inspection Checklist.

Responsibilities	NOISE AND VIBRATION
All Site Personnel	Limit works between 7am -7pm Monday to Saturday.
Community and Stakeholder representative/ Project Manager	Notify landowners and sensitive receivers of upcoming works that may cause noise and or vibration impacts.

Responsibilities	BUSHFIRE
All Site Personnel	Firefighting equipment available on LV's.
All Site Personnel	Hot works to be undertaken as per BMD Hot Works Permit.
All Site Personnel	Monitor Fire Danger Ratings and Total Fire Ban declarations.

Responsibilities	EARTHWORKS AND SITING
All Site Personnel	No vehicles, stockpiles or material to be placed on native vegetation outside approved clearance area.
All Site Personnel	Topsoil is not permitted to be transported between properties.
All Site Personnel	Material brought onto site must be certified clean fill.
All Site Personnel	Minimise area of disturbance where possible and progressively rehabilitate.

Responsibilities	WASTE WATER
All Site Personnel	Use designated biosecurity washdown areas as per map. Retain wastewater within bunding or impermeable surface.

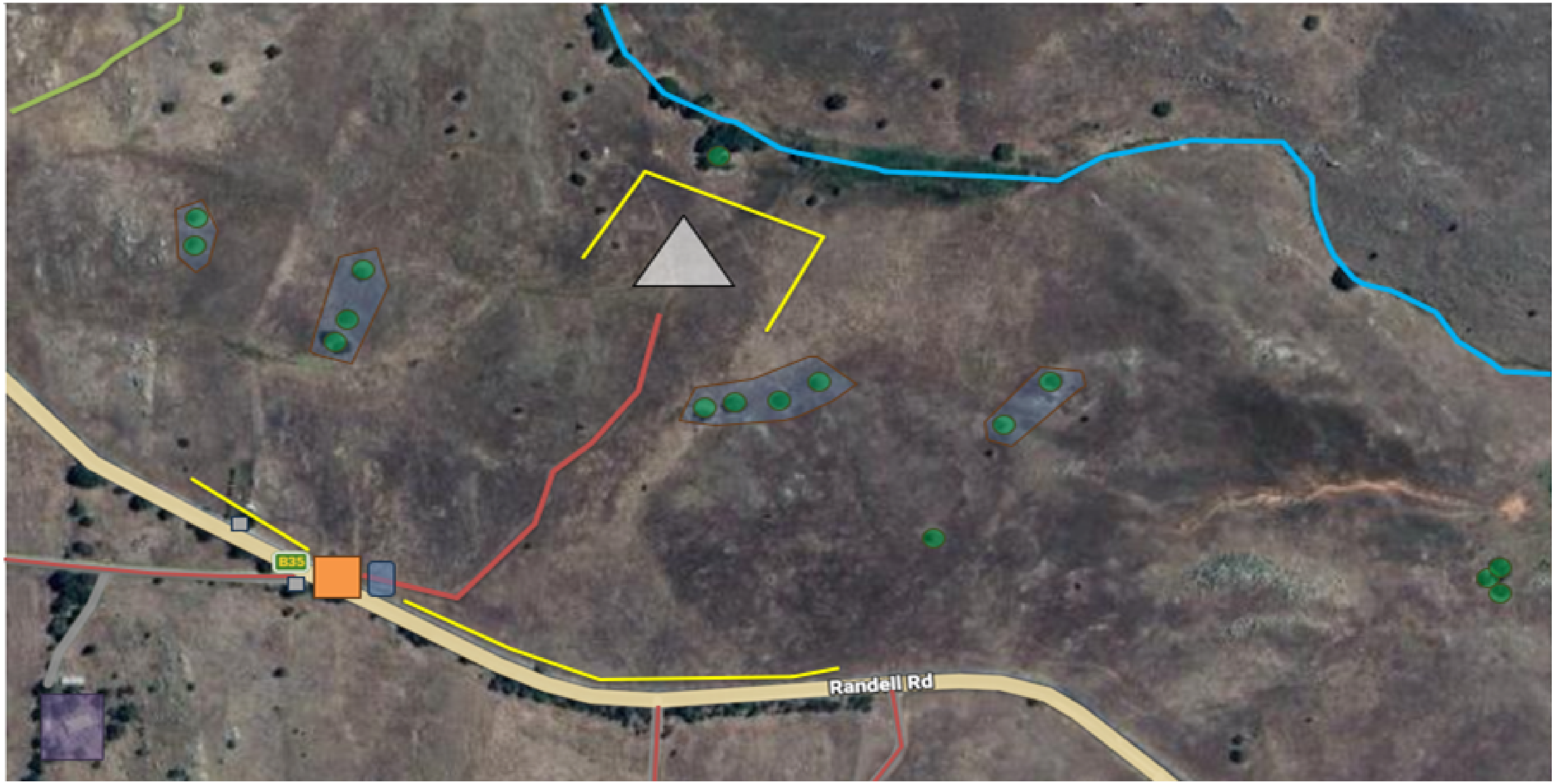
ENVIRONMENTAL INCIDENTS AND REPORTING

Any environmental incidents will be immediately reported to the environmental manager or construction manager, who will report the incident to the Principal as per project requirements.

SITE CONTACTS

SUPERINTENDENT - TBC
ENVIRO ADVISOR - TBC
FOREMAN – TBC

DRAFT



LEGEND

- Project boundary
- Access Track
- Indicative Turbine Location
- Randell Road
- Water Course
- Site Access Point
- Sediment Control Fence
- Rumble Grid
- Resident
- Tree to be retained
- Drain Guard
- Tree Protection Zone

10m

N
W E
S

NOTE: Location, size and extent of site features are indicative only

Palmer Wind Farm

SITE ENVIRONMENTAL CONTROL PLAN

SAMPLE

BMD

12. ATTACHMENT 3 – FINAL LAYOUT PLAN

BAROSSA

MID MURRAY

TUNGKILLO RD

RANDELL RD

ADELAIDE RD

Tungkillo

TERLINGA RD

RANDELL RD

Palmer

ADELAIDE RD

RANDELL RD

REEDY CREEK RD

Legend

- WTG Locations
- Permanent Met Mast Locations
- Site Access Points
- Access Tracks
- Underground Cables
- 275kV Transmission Line
- O&M Facility
- Southern Substation
- Northern Substation
- Construction Compound/Batch Plant/Laydown
- Project Area
- Micrositing Area - WTGs and Other Infrastructure
- State Roads
- Other Roads
- Local Government Areas

Note: Micrositing of Project infrastructure may occur in accordance with the Planning Consent, Amended Consolidated Particulars of Development and Section 3.7 of the Construction and Operational Environmental Management Plan.

N

Date: 12/06/2026
Version: C

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Meters

1:50,000

GDA2020 MGA Zone 54

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Palmer Wind Farm

Final Layout Plan

renewables

THAT'S THE POWER OF