

DOCUMENTARY VERIFICATION SCHEDULE

Independent Verification of Mandatory Requirements

Lal Lal Wind Farm

Governing Planning and Technical Framework

Part 1 — Purpose

This document accompanies the Supporting Record and Analytical Memorandum (Versions 1.0–1.3) and Annexes A–E.

The Supporting Record and Analytical Memorandum and Annexes record the documentary chronology, administrative history and evidentiary material obtained by the Trustee.

This document performs a different function.

It asks one central question.

Can the mandatory requirements of the governing planning and technical framework be independently verified from the disclosed documentary record?

This document does not determine compliance or non-compliance.

It does not determine legal rights.

It does not express regulatory findings.

Its purpose is limited to determining whether an independent reader can identify and reconcile the documentary record supporting each mandatory requirement.

Part 2 — The Governing Framework

The Lal Lal Wind Farm operates within a planning and technical framework.

The framework begins with the Planning and Environment Act 1987 (Victoria).

The Planning Permit issued under that Act establishes the legal requirements applicable to the wind farm.

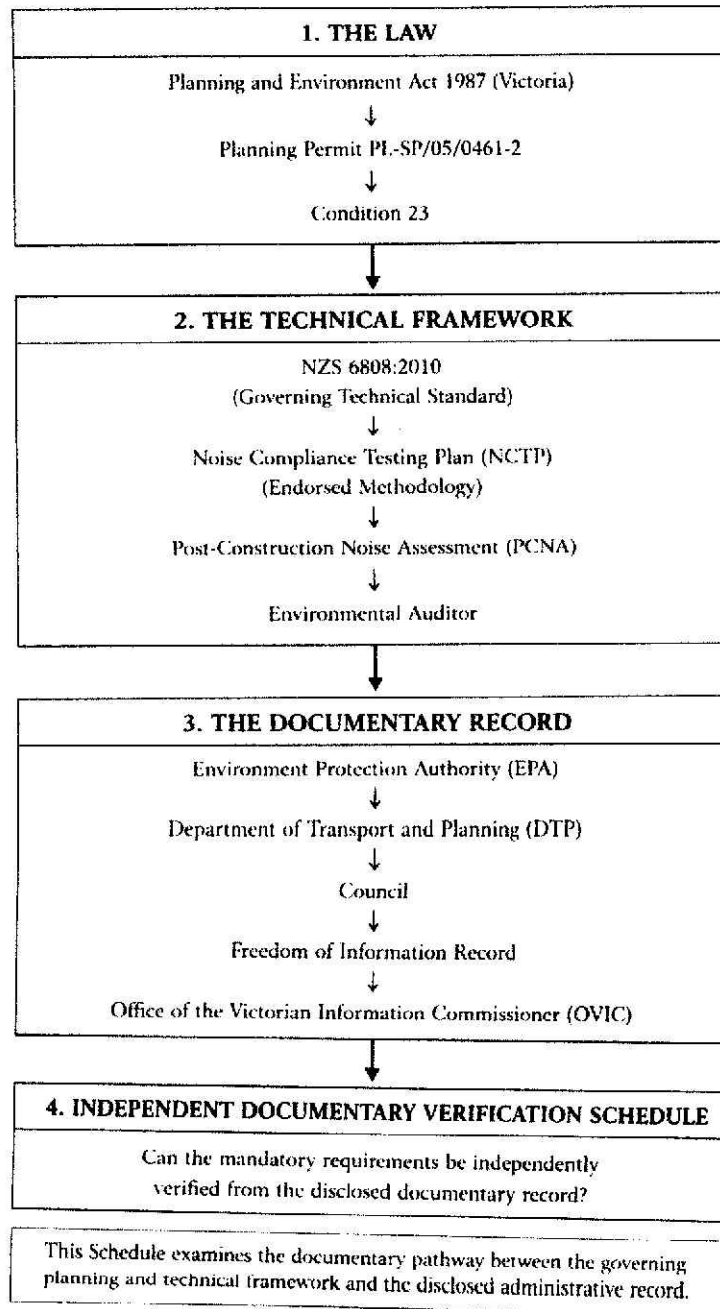
The Planning Permit incorporates NZS 6808:2010 as the governing technical standard for operational noise.

The Planning Permit also requires compliance to be demonstrated through the endorsed Noise Compliance Testing Plan (NCTP).

Subsequent reports, assessments, audits and regulatory decisions form part of the documentary record created in applying that framework.

The relationship between those documents is illustrated below.

RELATIONSHIP BETWEEN THE GOVERNING FRAMEWORK AND THE DOCUMENTARY RECORD



Part 3 — Why This Schedule Examines Mandatory Requirements

NZS 6808:2010 distinguishes between mandatory requirements and recommended practices.

The Standard uses the term "shall" to identify mandatory requirements.

The Standard uses the term "should" to identify recommended practices.

The Environmental Auditor expressly recognised this distinction in correspondence concerning the post-construction noise assessment.

Accordingly, this Schedule adopts that same distinction and examines only those requirements identified as mandatory.

Recommended practices are not examined unless they assist in understanding a mandatory requirement.

Part 4 — How This Schedule Works

Every mandatory requirement is examined using the same four questions.

Question 1

What does the governing framework require?

Question 2

What documents have been identified on the disclosed record?

Question 3

Does the disclosed record identify any document explaining or authorising any difference between the governing requirement and the disclosed record?

Question 4

Can an independent reader reconcile the governing requirement with the disclosed documentary record?

Each requirement is examined using the same process.

No additional assumptions are made.

No conclusions are drawn beyond the disclosed documentary record.

Where the documentary record enables independent verification, that is recorded.

Where the documentary record does not enable independent verification, that circumstance is also recorded.

Part 5 — Reading This Schedule

This Schedule should be read together with:

- Supporting Record and Analytical Memorandum Versions 1.0–1.3;
- Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- Annex B Version 1.1 — SAC-01 Record of Special Audible Characteristics;
- Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record; and
- Annex E — Planning Permit Amendment and Regulatory Transition Record.

The Supporting Record and Analytical Memorandum and Annexes contain the detailed documentary analysis.

This Schedule provides a structured pathway through that material by identifying the governing requirement, the documentary material identified on the disclosed record, and whether that material enables independent reconciliation of the mandatory requirement.

NZS-01 — Background Sound Level

Governing Requirement

NZS 6808:2010

Background sound level means:

"The A-frequency-weighted L90 centile level measured prior to the installation of any wind turbines in an area."

This is the governing definition incorporated into the Planning Permit.

Documentary Chronology

The following chronology identifies the principal documents located on the disclosed record that relate to this mandatory requirement. They are presented in chronological order only.

Date	Document	What the Document Records
23 January 2018	NCTP	Updated K15aa background report to be submitted prior to commencement of operation of the wind farm.
1 October 2019	Community Reference Group Minutes	Construction of all turbines completed. Reliability testing and commissioning at Elaine continuing.
22 October – 14 November 2019	K15aa Background Monitoring	Replacement K15aa background monitoring undertaken after the Community Reference Group recorded that construction of all turbines had been completed and reliability testing and commissioning at Elaine was continuing.
16 February 2021	SLR Baseline Noise Monitoring Report – Receptor K15aa	Completed approximately 15 months after the monitoring. Records that no wind turbine generators were operating during the Batch 2 monitoring period.
1 December 2022	SLR – Elaine Wind Farm Noise Compliance Letter	Refers to "Pre-construction baseline noise monitoring" at K15aa in approximately October 2018 , and states that the relevant noise limits were determined.
20 September 2024	Appendix H – K15aa Baseline Re-analysis	States that early commissioning had commenced during the same monitoring period and that wind turbine generators generated power.
EPA / OVIC / DTP Disclosure Record	Documentary Verification	The disclosed documentary record does not presently identify documentation reconciling these documentary positions or identifying when the updated K15aa background report was submitted to, received by, or formed part of the Responsible Authority's administrative record.

Documentary Verification

The disclosed documentary record was examined to determine whether an independent reader can reconcile:

- 1.the governing NZS definition of Background Sound Level;
- 2.the NCTP requirement that an updated K15aa background noise report be submitted to the Responsible Authority prior to commencement of operation of the wind farm;
- 3.the Community Reference Group Minutes recording that construction of all turbines had been completed and reliability testing and commissioning at Elaine was continuing prior to the October–November 2019 monitoring;
- 4.the SLR Baseline Noise Monitoring Report for Receptor K15aa stating that no wind turbine generators were operating during that monitoring period;
- 5.Appendix H recording that early commissioning had already commenced and that wind turbine generators generated power during that same monitoring period; and
- 6.the disclosed documentary record concerning submission, receipt and custody of the updated K15aa background noise report.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed documentary record identifies the governing requirement together with the subsequent documentary chronology.

The disclosed documentary record does not presently identify documentary material enabling an independent reader to reconcile the governing NZS requirement with the documentary chronology identified above.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Version 1.0,1.1,1.2 and 1.3;
- Annex A K15aa Record of Baseline Integrity and Regulatory Reliance.

NZS-02 — Notional Boundary

Governing Requirement

NZS 6808:2010

Notional boundary means:

"A line 20 metres from any side of a dwelling or other building used for a noise sensitive activity, or the legal boundary where this is closer to such a building."

This is the governing definition incorporated into the Planning Permit.

Documentary Chronology

The following documentary chronology has been identified from the disclosed documentary record.

Date	Document	What the Document Records
NZS 6808:2010	Governing Technical	Defines the Notional Boundary as a line 20 metres from any side of a dwelling , or the

	Standard	legal boundary where this is closer.
15 August 2024	EPA Correspondence	EPA confirms the NZS definition of a Noise Sensitive Location , including the governing definition of the Notional Boundary , in response to a request for clarification.
22 October – 14 November 2019	K15aa Background Monitoring	The monitoring location later relied upon for Receptor K15aa was established during this period.
16 February 2021	SLR Baseline Noise Monitoring Report – Receptor K15aa	Completed approximately 15 months after the October–November 2019 monitoring. Figure 2 records the K15aa background monitoring position approximately 100 metres north of the residential dwelling , together with the previous 2017 monitoring locations. Records that the 2019 background monitoring for K15aa was completed approximately 100 metres north of the residential dwelling . States that the operational compliance monitoring location was consistent with the 2019 background monitoring position . The assessment methodology also reproduces the NCTP requirements that measurements shall occur within 20 metres of the dwelling and as close as practically possible to the location of the background noise monitoring .
2023 Post-Construction Noise Assessment	Noise Measurement Methodology	The disclosed documentary record does not presently identify a document authorising, approving or explaining the adoption of the monitoring position relied upon for Receptor K15aa in place of the governing NZS definition of the Notional Boundary, nor does it identify when such a document formed part of the Responsible Authority's administrative record.
EPA / OVIC / DTP Disclosure Record	Documentary Verification	

Documentary Verification

The disclosed documentary record was examined to determine whether an independent reader can reconcile:

- 1.the governing NZS definition of the Notional Boundary;
- 2.the monitoring location adopted for the 2019 K15aa background noise monitoring;
- 3.the monitoring location adopted for the subsequent operational compliance monitoring;
- 4.the NCTP requirements that measurements shall occur within 20 metres of the dwelling and as close as practically possible to the location of the background noise monitoring;
- 5.any document authorising, varying or explaining a methodology different from the governing NZS definition of the Notional Boundary; and
- 6.the disclosed documentary record concerning approval, submission, receipt or custody of any such document.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed documentary record identifies the governing NZS definition together with the subsequent documentary chronology.

The disclosed documentary record does not presently identify documentary material enabling an independent reader to reconcile the governing NZS definition of the Notional Boundary with the documentary chronology identified above.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Version 1.0, 1.1, 1.2 and 1.3;
- Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- EPA correspondence concerning the NZS definition of a Noise Sensitive Location;
- EPA / OVIC Freedom of Information correspondence and associated documentary record.

NCTP-01 — Updated K15aa Background Noise Report

Governing Requirement

Noise Compliance Testing Plan (NCTP)

23 January 2018

The NCTP records that the original K15aa background monitoring undertaken between August and September 2017 was not considered suitable for representing typical background noise levels.

Accordingly, replacement background monitoring was undertaken and the NCTP states:

"...Prior to commencement of operation of the wind farm, an updated background noise report is to be submitted to the Responsible Authority, detailing the monitoring results for K15aa, along with the results of any additional background noise monitoring conducted at other receiver locations around the Lal Lal Wind Farm."

This forms part of the endorsed methodology incorporated into the Planning Permit.

Documentary Chronology

The following documentary chronology has been identified from the disclosed documentary record.

Date	Document	What the Document Records
23 January 2018	Noise Compliance Testing Plan (NCTP)	Records that the original K15aa background monitoring was unsuitable and that an updated background noise report is to be submitted to the Responsible Authority prior to commencement of operation of the wind farm.
22 October	K15aa	Replacement background monitoring undertaken for

14 November 2019	Background Monitoring (Batch 2)	Receptor K15aa.
16 February 2021	SLR Baseline Noise Monitoring Report – Receptor K15aa	Completed approximately 15 months after the October–November 2019 monitoring. Relies upon the 2019 K15aa monitoring as the background sound level for Receptor K15aa.
1 December 2022	SLR – Elaine Wind Farm Noise Compliance Letter	Refers to " Pre-construction baseline noise monitoring " at K15aa in approximately October 2018 and states that the relevant noise limits were determined.
20 September 2024	Appendix H – K15aa Baseline Re-analysis	Re-examines the 2019 K15aa monitoring and records that early commissioning had already commenced during that monitoring period.
14 April 2025	LLWF Response to EPA Information Gathering Notice	Explains the post-construction compliance pathway undertaken pursuant to the Planning Permit and endorsed NCTP, identifying the reports and auditor verification relied upon.
EPA / OVIC / DTP Disclosure Record	Documentary Verification	The disclosed documentary record does not presently identify the updated background noise report referred to in the NCTP as having been submitted to the Responsible Authority prior to commencement of operation of the wind farm, nor does it identify when that report was submitted to, received by, or formed part of the Responsible Authority's administrative record.

Documentary Verification

The disclosed documentary record was examined to determine whether an independent reader can reconcile:

- 1.the NCTP requirement that an updated K15aa background noise report be submitted to the Responsible Authority prior to commencement of operation of the wind farm;
- 2.the replacement K15aa background monitoring undertaken during October–November 2019;
- 3.the subsequent documents relying upon, describing or re-analysing that monitoring;
- 4.the documentary record identifying submission, receipt or custody of the updated K15aa background noise report by the Responsible Authority; and
- 5.any document explaining or authorising a documentary pathway different from that contemplated by the endorsed NCTP.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed documentary record identifies the requirement for an updated K15aa background noise report together with subsequent documents relying upon the replacement background monitoring.

The disclosed documentary record does not presently identify documentary material enabling an independent reader to verify when the updated background noise report referred to in the NCTP was submitted to, received by, or formed part of the Responsible Authority's administrative record.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Version 1.0, 1.1, 1.2 and 1.3;
- Annex A – K15aa Record of Baseline Integrity and Regulatory Reliance;
- Annex D Version 1.1 – Cross-Agency Custody, Administrative Progression and Reliance Record.

NCTP-02 — Operational Noise Measurement Locations

Governing Requirement

Noise Compliance Testing Plan (NCTP)

Section 4.1 – Operational Noise Measurement Locations

The endorsed Noise Compliance Testing Plan (NCTP), dated 23 January 2018, prescribes the mandatory operational noise measurement locations for the post-construction compliance assessment.

Section 4.1 provides that operational noise measurements shall be carried out at the following six (6) preferred noise sensitive receiver locations, subject to permission being granted by the respective landowners:

- H18aa
- K15aa
- K34aa
- L18aa
- M29aa
- N31ab

Section 4.1 further provides that:

- the measurement systems shall be positioned in the vicinity of the dwelling at each preferred noise sensitive receiver;
- the measurements shall not occur within 3.5 metres of a vertical reflecting surface;
- the measurements shall occur within 20 metres of the dwelling;
- the measurements shall occur as close as practically possible to the location of the background noise monitoring; and
- where permission cannot be obtained for the preferred receiver locations, alternative locations shall be considered.

These requirements form part of the endorsed methodology incorporated into Planning Permit PL-SP/05/0461 and are relied upon by the post-construction compliance assessments.

Documentary Chronology

The following documentary chronology has been identified from the disclosed administrative and documentary record.

Date	Document	What the Document Records
23 January 2018	Noise Compliance Testing Plan	Prescribes the six preferred operational noise measurement locations together with the mandatory requirements governing measurement position, including that measurements shall occur within 20 metres of the dwelling and as close as practically possible to the corresponding background noise monitoring location.
2021	Stage 1 (Elaine) Post-Construction Noise Assessment	Records that environmental noise loggers were installed and configured in accordance with the endorsed Noise Compliance Testing Plan. Table 2 reproduces the operational noise measurement location requirements and records that the updated K15aa background monitoring completed in 2019 was undertaken approximately 100 metres north of the residential dwelling to eliminate extraneous household mechanical plant noise, and that the operational compliance monitoring location was consistent with that 2019 background monitoring position.
20 September 2024	Stage 2 Post-Construction Noise Assessment	Records continued use of the K15aa monitoring position together with the operational noise measurement locations adopted for the Stage 2 compliance assessment.
EPA Freedom of Information / OVIC Review	Administrative and Documentary Record	Further review of the disclosed administrative and documentary record identified documents relating to the operational compliance assessments, including the Stage 1 and Stage 2 Post-Construction Noise Assessments. Further review did not identify a separate document, instrument, approval or other documentary authority explaining the relationship between the adopted K15aa monitoring position, the notional boundary requirements of NZS 6808:2010 and the operational noise measurement location requirements prescribed by the endorsed Noise Compliance Test Plan.
Administrative and Documentary Record	Documentary Verification	Further review of the disclosed administrative and documentary record considered the relationship between the operational noise measurement location requirements prescribed by the endorsed Noise Compliance Test Plan, the operational compliance assessments, the disclosed Freedom of Information material and the supporting documentary record.

Documentary Verification

Further review of the disclosed administrative and documentary record was undertaken to determine whether an independent reader can verify:

- 1.the preferred operational noise measurement locations prescribed by Section 4.1 of the endorsed Noise Compliance Test Plan;

- 2.the operational noise measurement locations adopted within the Stage 1 and Stage 2 Post-Construction Noise Assessments;
- 3.the documentary basis upon which the K15aa compliance monitoring location is described as being consistent with the 2019 updated background monitoring location;
- 4.the relationship between the operational noise measurement location adopted for K15aa and the mandatory requirement that measurements occur within 20 metres of the dwelling;
- 5.the relationship between the operational noise measurement location adopted for K15aa and the mandatory requirement that measurements occur as close as practically possible to the corresponding background noise monitoring location;
- 6.the relationship between the operational noise measurement location adopted for K15aa and the notional boundary defined by NZS 6808:2010;
- 7.whether any alternative operational noise measurement locations were adopted at the remaining preferred receiver locations;
- 8.the documentary basis for adoption of any alternative operational noise measurement locations;
- 9.whether the disclosed administrative and documentary record identifies any document, instrument, approval, endorsement or other documentary authority recording or explaining the basis upon which the operational noise measurement location adopted for K15aa was considered consistent with the mandatory location requirements prescribed by the endorsed Noise Compliance Test Plan and NZS 6808:2010; and
- 10.the disclosed administrative and documentary record supporting those operational noise measurement locations.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed administrative and documentary record identifies the preferred operational noise measurement locations prescribed by the endorsed Noise Compliance Test Plan together with the operational noise measurement locations adopted within the Stage 1 and Stage 2 Post-Construction Noise Assessments.

The disclosed administrative and documentary record further records that the K15aa operational compliance monitoring location was adopted consistently with the updated background monitoring position established during 2019.

Further review of the disclosed administrative and documentary record identifies additional documentary observations concerning the relationship between the adopted K15aa monitoring location, the notional boundary defined by NZS 6808:2010, the mandatory operational noise measurement location requirements prescribed by the endorsed Noise Compliance Test Plan and the documentary material disclosed through the Freedom of Information process.

The disclosed administrative and documentary record does not presently identify a separate document, instrument, approval or other documentary authority explaining that relationship.

The detailed documentary chronology and associated record-based observations are recorded separately within the Supporting Record and Analytical Memorandum and Annex A.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Versions 1.0, 1.1, 1.2 and 1.3;
- Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record.

NCTP-03 — Operational Noise Measurement Timing and Duration

Governing Requirement

Noise Compliance Testing Plan (NCTP)

Section 4.3 Operational Noise Measurement Timing and Duration

The endorsed Noise Compliance Testing Plan (NCTP), dated 23 January 2018, prescribes the mandatory timing and duration requirements for operational noise compliance monitoring.

Section 4.3 provides that compliance measurements shall be conducted in two (2) stages of monitoring for each measurement location.

Each stage shall comprise a minimum of four (4) weeks continuous monitoring, extended by up to four (4) weeks if required to obtain sufficient data.

Section 4.3 further provides that:

- the first stage of monitoring shall be commenced within two (2) months following the commissioning of the last turbine of the Lal Lal Wind Farm;
- the second stage shall commence between ten (10) and twelve (12) months following the commissioning of the last turbine of the Lal Lal Wind Farm;
- a preliminary analysis of the data may be undertaken to assess the suitability of the data prior to completion of the measurements;
- where significant data limitations remain evident following survey extension, the merits of an additional survey extension shall be reviewed by the acoustic consultant responsible for conducting the testing;
- where further extensions are not considered warranted, the compliance assessment strategy shall be reviewed and the Responsible Authority consulted; and
- the monitoring program was selected to capture data over a range of operating conditions during the first twelve (12) months of the wind farm's operation.

These requirements form part of the endorsed methodology incorporated into Planning Permit PL-SP/05/0461.

Documentary Chronology

The following documentary chronology has been identified from the disclosed administrative and documentary record.

Date	Document	What the Document Records
23 January 2018	Noise Compliance Testing Plan	Prescribes the mandatory timing and duration requirements for the two-stage operational

Date	Document	What the Document Records
		compliance monitoring program, including commencement of Stage 1 and Stage 2 monitoring by reference to commissioning of the last turbine of the Lal Lal Wind Farm.
March–May 2021	Stage 1 (Elaine) Post-Construction Noise Assessment	Records that the Stage 1 Elaine assessment was performed based upon operational noise monitoring undertaken between March 2021 and May 2021.
31 October 2023	Stage 1 (Elaine) Post-Construction Noise Assessment	Final Stage 1 Elaine report issued. The document control records earlier report versions dated 23 March 2022, 27 June 2022, 2 June 2023 and 14 June 2023.
26 May–1 August 2022	Stage 1 (Yendon) Post-Construction Noise Assessment	Records that the Stage 1 Yendon assessment was performed based upon operational noise monitoring undertaken between 26 May 2022 and 1 August 2022.
31 October 2023	Stage 1 (Yendon) Post-Construction Noise Assessment	Final Stage 1 Yendon report issued. The report records that, owing to extended turbine outages during earlier Stage 1 noise testing, and to avoid further delay, it was determined that the Yendon and Elaine portions of the wind farm would be considered separately for the purposes of the Stage 1 compliance assessment.
March 2023 – January 2024	Stage 2 Post-Construction Noise Assessment	Records that the Stage 2 assessment was performed based upon monitoring campaigns undertaken between March 2023 and January 2024, including additional monitoring undertaken at two receiver locations.
20 September 2024	Stage 2 Post-Construction Noise Assessment	Final Stage 2 report issued. The revision history records earlier revisions dated 19 August 2024 and 22 August 2024.
Administrative and Documentary Record	Documentary Verification	Further review of the disclosed administrative and documentary record considered the relationship between the commissioning chronology, the timing requirements prescribed by Section 4.3 of the endorsed Noise Compliance Testing Plan and the monitoring chronology recorded within the Stage 1 and Stage 2 Post-Construction Noise Assessments.

Documentary Verification

Further review of the disclosed administrative and documentary record was undertaken to determine whether an independent reader can verify:

- 1.the commissioning date of the last turbine of the Lal Lal Wind Farm relied upon for commencement of the operational compliance monitoring program;
- 2.that Stage 1 operational compliance monitoring commenced within two (2) months following commissioning of the last turbine of the Lal Lal Wind Farm;
- 3.that Stage 2 operational compliance monitoring commenced between ten (10) and twelve (12) months following commissioning of the last turbine of the Lal Lal Wind Farm;
- 4.the duration of each stage of operational compliance monitoring undertaken for each measurement location;

- 5.whether any monitoring stage was extended in accordance with Section 4.3 to obtain sufficient assessment data;
- 6.whether the disclosed administrative and documentary record identifies any review undertaken by the acoustic consultant concerning additional survey extensions;
- 7.whether the disclosed administrative and documentary record identifies any review of the compliance assessment strategy or consultation with the Responsible Authority as contemplated by Section 4.3 of the endorsed Noise Compliance Testing Plan;
- 8.the relationship between the operational monitoring chronology recorded within the Stage 1 Elaine, Stage 1 Yendon and Stage 2 Post-Construction Noise Assessments and the commissioning chronology of the Lal Lal Wind Farm;
- 9.the relationship between the explanation recorded within the Stage 1 Yendon Post-Construction Noise Assessment concerning extended turbine outages and separate Stage 1 assessment of the Elaine and Yendon portions of the wind farm and the timing requirements prescribed by Section 4.3 of the endorsed Noise Compliance Testing Plan; and
- 10.the disclosed administrative and documentary record supporting those timing and duration requirements.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed administrative and documentary record identifies the timing and duration requirements prescribed by Section 4.3 of the endorsed Noise Compliance Testing Plan together with the monitoring chronology recorded within the Stage 1 Elaine, Stage 1 Yendon and Stage 2 Post-Construction Noise Assessments.

The disclosed administrative and documentary record further identifies explanatory narrative within the Stage 1 Yendon Post-Construction Noise Assessment recording that, owing to extended turbine outages during earlier Stage 1 noise testing and to avoid further delay, the Yendon and Elaine portions of the wind farm were assessed separately.

Further review of the disclosed administrative and documentary record identifies additional documentary observations concerning the relationship between the monitoring chronology, the commissioning chronology and the timing requirements prescribed by Section 4.3 of the endorsed Noise Compliance Testing Plan.

The disclosed administrative and documentary record does not presently identify documentary material enabling an independent reader to reconcile the monitoring chronology recorded within the Stage 1 Elaine, Stage 1 Yendon and Stage 2 Post-Construction Noise Assessments with the commissioning chronology prescribed by Section 4.3 of the endorsed Noise Compliance Testing Plan.

The detailed documentary chronology and associated record-based observations are recorded separately within the Supporting Record and Analytical Memorandum and the associated Annexes.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Versions 1.0, 1.1, 1.2 and 1.3;

- Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record;

NCTP-04 — Operational Noise Reporting

Governing Requirement

Noise Compliance Testing Plan (NCTP)

Section 6.0 – Operational Noise Reporting

The endorsed Noise Compliance Testing Plan (NCTP), dated 23 January 2018, prescribes the mandatory reporting requirements for the operational compliance assessment.

Section 6.0 provides that compliance reports shall be submitted to the Minister for Planning within six (6) weeks of completing each stage of the compliance monitoring.

Section 6.0 further provides that the reporting shall adhere to the documentation requirements detailed in Section 8.3 of NZS 6808:2010 and shall include:

- supporting documentation for the site wind speed data referenced in the compliance assessment;
- charts illustrating the noise measurement results clearly identifying all samples filtered from the analysis due to rainfall or the identification of extraneous noise influences;
- summary tables for each monitoring location detailing:
 - the total number of measurement points;
 - the number of measurement points removed; and
 - the final number of data points upon which the assessment is based;
- full details of all attended observations conducted for the purpose of identifying where Special Audible Characteristics are potentially present in the sound of the wind farm; and
- full details of any supplementary procedures adopted as part of conducting the compliance assessment.

These reporting requirements form part of the endorsed methodology incorporated into Planning Permit PL-SP/05/0461.

Documentary Chronology

The following documentary chronology has been identified from the disclosed administrative and documentary record.

Date	Document	What the Document Records
23 January 2018	Noise Compliance Testing Plan	Prescribes the mandatory operational reporting requirements, including submission of compliance reports within six (6) weeks following completion of each monitoring stage and the documentary material required to be included within each report.
March–May 2021	Stage 1 Elaine monitoring	Stage 1 Elaine monitoring completed.
31 October 2023	Stage 1 Elaine Post-Construction Noise	Final Stage 1 Elaine report issued following a documented report revision history.

Date	Document	What the Document Records
	Assessment	
26 May–1 August 2022	Stage 1 Yendon monitoring	Stage 1 Yendon monitoring completed.
31 October 2023	Stage 1 Yendon Post-Construction Noise Assessment	Final Stage 1 Yendon report issued following a documented report revision history.
March 2023–January 2024	Stage 2 monitoring	Stage 2 monitoring completed, including additional monitoring undertaken at two receiver locations.
20 September 2024	Stage 2 Post-Construction Noise Assessment	Final Stage 2 report issued following documented revisions during August and September 2024.
Administrative and Documentary Record	Documentary Verification	Further review considered the relationship between the mandatory reporting requirements prescribed by Section 6.0 of the endorsed Noise Compliance Testing Plan and the documentary material contained within the disclosed post-construction noise assessment reports.

Documentary Verification

Further review of the disclosed administrative and documentary record was undertaken to determine whether an independent reader can verify:

- 1.that each compliance report was submitted to the Minister for Planning within six (6) weeks of completion of the relevant monitoring stage;
- 2.the documentary evidence identifying the submission date of each compliance report;
- 3.the relationship between completion of each monitoring stage and the report preparation chronology recorded within the disclosed reports;
- 4.the supporting documentation for the site wind speed data referenced within each compliance assessment;
- 5.the charts and summary tables identifying rainfall filtering, extraneous noise filtering and the measurement data relied upon for each assessment;
- 6.the full details of all attended observations conducted for the purpose of identifying where Special Audible Characteristics were potentially present in the sound of the wind farm;
- 7.the relationship between the attended observations recorded within the compliance reports and the reporting requirements prescribed by Section 6.0 of the endorsed Noise Compliance Testing Plan;
- 8.the identity and purpose of any additional monitoring locations, monitoring equipment or intermediate monitoring locations identified within the appendices to the compliance reports;
- 9.whether the disclosed administrative and documentary record identifies those additional monitoring locations, monitoring equipment or assessment techniques as supplementary procedures adopted as part of conducting the compliance assessment;
- 10.the full details of any supplementary procedures adopted as part of conducting the compliance assessment; and
- 11.the disclosed administrative and documentary record supporting those reporting requirements.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed administrative and documentary record identifies the reporting requirements prescribed by Section 6.0 of the endorsed Noise Compliance Testing Plan together with the Stage 1 Elaine, Stage 1 Yendon and Stage 2 Post-Construction Noise Assessments.

Further review of the disclosed administrative and documentary record identifies additional documentary observations concerning the relationship between:

- (a) completion of each monitoring stage and preparation of the corresponding compliance report;
- (b) the documentary record identifying submission of each compliance report;
- (c) the reporting of attended observations relied upon for identification of Special Audible Characteristics;
- (d) the reporting of additional monitoring locations and monitoring equipment identified within the appendices to the compliance reports; and
- (e) the reporting of any supplementary procedures adopted during the compliance assessments.

The disclosed administrative and documentary record does not presently identify documentary material enabling an independent reader to reconcile each of the reporting requirements prescribed by Section 6.0 of the endorsed Noise Compliance Testing Plan with the documentary material presently disclosed.

The detailed documentary chronology and associated record-based observations are recorded separately within the Supporting Record and Analytical Memorandum and the associated Annexes.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Versions 1.0, 1.1, 1.2 and 1.3;
- Annex B Version 1.1 – SAC-01 – Special Audible Characteristics Record;
- Annex C Version 1.2 – EPA Internal Review Correspondence and Regulatory Reliance Record;
- Annex D Version 1.1 – Cross-Agency Custody, Administrative Progression and Reliance Record.

NCTP-05 – Special Audible Characteristics Assessment

Governing Requirement

Noise Compliance Testing Plan (NCTP)

Section 4.4 – Special Audible Characteristics

The endorsed Noise Compliance Testing Plan (NCTP), dated 23 January 2018, prescribes the methodology for identification and assessment of Special Audible Characteristics (SACs) during operational compliance monitoring.

Section 4.4 provides that the presence of Special Audible Characteristics associated with the wind farm shall be reviewed.

Where amplitude modulation, impulsiveness or tonality are identified, an objective assessment of the sound's character shall be undertaken to determine whether penalties should be applied to the measured operational noise levels.

Section 4.4 further provides that identification of Special Audible Characteristics shall be based upon attended observations undertaken by a qualified acoustic engineer experienced in wind farm sound assessment.

The endorsed NCTP further provides that:

- three (3) sets of attended observations shall be undertaken during each stage of monitoring;
- the three sets of observations shall comprise:
 - deployment of the monitoring instrumentation;
 - an interim visit; and
 - retrieval of the monitoring instrumentation;
- the wind farm must be operating during the attended observations;
- attempts shall be made to undertake observations during suitable weather conditions;
- at least one (1) set of attended observations during each monitoring stage shall be conducted during the night;
- each attended observation shall comprise observations for at least ten (10) minutes at a minimum of six (6) locations around the wind farm in the vicinity of the compliance monitoring locations;
- where the wind farm is clearly audible, observations shall be increased to thirty (30) minutes;
- observations shall also be undertaken in proximity to the turbines during at least one (1) of the three attended observation sets; and
- the purpose of the near-turbine observations is to assist assessment of potential Special Audible Characteristics at the compliance monitoring locations.

These requirements form part of the endorsed methodology incorporated into Planning Permit PL-SP/05/0461.

Documentary Chronology

The following documentary chronology has been identified from the disclosed administrative and documentary record.

Date	Document	What the Document Records
23 January 2018	Noise Compliance Testing Plan	Prescribes the mandatory methodology for identification and assessment of Special Audible Characteristics, including the required attended observation methodology.
2021	Stage 1 (Elaine) Post-Construction Noise Assessment	Records that subjective attended observations were undertaken in accordance with Appendix B1 of NZS 6808:2010. Appendix D records the attended

Date	Document	What the Document Records
2023–2024	Stage 2 Post-Construction Noise Assessment	observation chronology relied upon for the Stage 1 assessment. Records that subjective attended observations were undertaken in accordance with Appendix B1 of NZS 6808:2010. Appendix C records the attended observation chronology relied upon for the Stage 2 assessment.
20 September 2024	Stage 2 Post-Construction Noise Assessment	Records monitoring between March 2023 and January 2024, including additional monitoring undertaken at two receiver locations during the later monitoring period. Further review of the disclosed administrative and documentary record considered the relationship between the mandatory SAC methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan and the attended observations recorded within the Stage 1 and Stage 2 Post-Construction Noise Assessments.
Administrative and Documentary Record	Documentary Verification	

Documentary Verification

Further review of the disclosed administrative and documentary record was undertaken to determine whether an independent reader can verify:

1. that the attended observations recorded within the Stage 1 and Stage 2 Post-Construction Noise Assessments reflect the methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan;
2. that three (3) attended observation sets were undertaken during each stage of monitoring;
3. that the attended observations comprised deployment, interim and retrieval observations;
4. that at least one (1) attended observation set during each monitoring stage was undertaken during the night;
5. that attended observations were undertaken at a minimum of six (6) locations around the wind farm in the vicinity of the compliance monitoring locations;
6. that observations were undertaken in proximity to the turbines during at least one (1) attended observation set;
7. the relationship between the attended observation chronology recorded within Appendix D of the Stage 1 assessment and Appendix C of the Stage 2 assessment and the monitoring chronology recorded within the corresponding reports;
8. the relationship between the reference within the Stage 1 and Stage 2 reports to Appendix B1 of NZS 6808:2010 and the mandatory attended observation methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan;
9. whether the disclosed administrative and documentary record identifies the relationship between the attended observations and the additional Stage 2 monitoring undertaken between October 2023 and January 2024;
10. the relationship between the attended observations undertaken at the compliance monitoring locations and those undertaken at intermediary and near-turbine locations; and

11. the disclosed administrative and documentary record supporting those Special Audible Characteristics assessment requirements.

Verification Outcome

Independent documentary verification can presently be undertaken only to the extent of the disclosed administrative and documentary record.

The disclosed administrative and documentary record identifies the mandatory attended observation methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan together with the attended observation records contained within Appendix D of the Stage 1 Post-Construction Noise Assessment and Appendix C of the Stage 2 Post-Construction Noise Assessment.

Further review of the disclosed administrative and documentary record identifies additional documentary observations concerning the relationship between the attended observation chronology, the operational monitoring chronology and the methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan.

The disclosed administrative and documentary record does not presently identify documentary material enabling an independent reader to reconcile each element of the mandatory attended observation methodology prescribed by Section 4.4 of the endorsed Noise Compliance Testing Plan with the attended observation chronology recorded within the disclosed post-construction noise assessment reports.

The detailed documentary chronology and associated record-based observations are recorded separately within the Supporting Record and Analytical Memorandum and Annex B Version 1.1.

Supporting Documentary Record

The detailed documentary chronology, Freedom of Information material and supporting analysis are contained within:

- Supporting Record and Analytical Memorandum Versions 1.0, 1.1, 1.2 and 1.3;
- Annex B Version 1.1 — SAC-01 — Special Audible Characteristics Record;
- Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record.

This Verification Schedule should not be read independently of the Supporting Record and Analytical Memorandum or the associated Annexes. Those documents identify the documentary chronology, Freedom of Information outcomes, administrative interactions, document custody and record-based observations from which the documentary verification undertaken within this Schedule has been derived.

Verification Schedule Status

This Verification Schedule records the outcome of an independent documentary review of the governing technical framework applicable to the post-construction operational noise assessment of the Lal Lal Wind Farm.

The Schedule examines the principal mandatory requirements prescribed by NZS 6808:2010 and the endorsed Noise Compliance Testing Plan and records the extent to which those requirements can be independently verified from the presently disclosed administrative and documentary record.

The Verification Schedule has been prepared by reference to the documentary material presently disclosed through the planning record, Freedom of Information processes, publicly available technical reports and associated administrative correspondence.

Where the disclosed documentary record enables independent verification of a mandatory requirement, that position has been recorded.

Where the disclosed documentary record does not presently identify sufficient documentary material to enable independent verification or reconciliation of a mandatory requirement, that position has likewise been recorded.

Accordingly, this Verification Schedule neither supplements missing documentary material, infers the existence of documents not identified within the disclosed administrative record, nor substitutes analysis for documentary verification.

This Verification Schedule does not determine technical compliance, statutory compliance, regulatory compliance, legal rights, liability, causation or administrative error.

Rather, it records whether an independent reader, relying solely upon the presently disclosed administrative and documentary record, is able to identify and reconcile the documentary pathway by which the mandatory requirements of the governing framework are addressed.

The Schedule is therefore intended to be read together with the Supporting Record and Analytical Memorandum and the associated Annexes, which record in greater detail the documentary chronology, Freedom of Information outcomes, administrative interactions, document custody, regulatory reliance and associated record-based observations relevant to the matters summarised within this Verification Schedule.

Collectively, those documents comprise the Trustee's consolidated administrative and evidentiary record concerning the Lal Lal Wind Farm as at the execution date.

Nothing contained within this Verification Schedule retrospectively alters, replaces or qualifies the documentary content of any source document examined.

Equally, nothing contained within this Verification Schedule should be construed as supplying documentary reconciliation where the presently disclosed administrative record does not itself identify that reconciliation.

The Verification Schedule records the state of the disclosed administrative and documentary record as at its execution date only. Should additional documentary material become available through subsequent administrative processes, Freedom of Information disclosures or regulatory decisions, those matters may be incorporated within a future supplementary version without retrospectively altering the documentary record recorded herein.

Document Status — Executed Record

This document constitutes the executed Documentary Verification Schedule as at the execution date.

The Verification Schedule is to be read together with:

- (a) Supporting Record and Analytical Memorandum Version 1.0 (7 March 2026);

- (b) Supporting Record and Analytical Memorandum Version 1.1 (16 March 2026);
- (c) Supporting Record and Analytical Memorandum Version 1.2 (6 June 2026);
- (d) Supporting Record and Analytical Memorandum Version 1.3 ([Execution Date]);
- (e) Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- (f) Annex B Version 1.1 — SAC-01 — Special Audible Characteristics Record;
- (g) Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- (h) Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record; and
- (i) Annex E — Planning Permit Amendment and Regulatory Transition Record.

Together, these documents comprise the administrative and evidentiary record maintained by the Trustee as at the execution date of this Verification Schedule.

This Verification Schedule records the documentary verification of the principal mandatory requirements prescribed by NZS 6808:2010 and the endorsed Noise Compliance Testing Plan by reference to the presently disclosed administrative and documentary record.

It records the state of the disclosed administrative and documentary record as at the execution date only.

Subsequent documentary or administrative developments, should they occur, may be recorded within later supplementary versions of this Verification Schedule, the Supporting Record and Analytical Memorandum, or the associated Annexes.

Such developments do not retrospectively alter the documentary or administrative record recorded by earlier executed versions but may be incorporated as supplementary material where necessary to preserve the continuing integrity, chronology and completeness of the Trustee's consolidated administrative and evidentiary record.

Execution

Executed by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

By: 

Name: Owen Lewis

Title: Director

Date: 29/06 / 2026