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8/10/2024

Iwan Davies
Director Energy Assessments
Planning and Assessment
Department of Planning, Housing and Infrastructure

Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval to vary road upgrade staging under consent condition B7 (updated)

Dear Iwan,

1. Introduction

Goulburn River Solar Farm (SSD-3396533) received Development Consent under the *Environmental Planning and Assessment Act 1979* on 22 August 2024. Goulburn River Solar Farm (the Project) is a large-scale renewable energy project which will be developed by Lightsource Development Services Australia Pty Ltd (Lightsource bp) to generate solar renewable energy to supply New South Wales (NSW) with green electrons. The Project site is located at 2335 Wollara Road, within the Upper Hunter Local Government Area of NSW and approximately 28 kilometres southwest of the township of Merriwa.

Lightsource bp is finalising the construction program with the Project's Engineering, Procurement and Construction (EPC) contractor. Construction activities will commence in Quarter 4 2024 with upgrades to the Golden Highway and Ringwood Road intersection planned from November 2024.

The Project is focussed on meeting key milestone dates committed to under our awarded Long Duration Storage – Long Term Energy Services Agreement (LDS LTESA) with the NSW Government, as well as milestones with energy off-takers under Power Purchase Agreements. The LDS LTESA is a contract mechanism which underpins the business case for long duration storage in the NSW energy system and forms a key pillar of the NSW Electricity Infrastructure Roadmap, which is in turn enabled by the *Electricity Infrastructure Investment Act 2020*. The Goulburn River Solar Farm Battery Energy Storage System (BESS), which is subject to the LTESA, is a proposed 225 MW | 560 MWh DC-coupled battery that is integrated into the Goulburn River Solar Farm, with the BESS modules to be distributed around the solar farm (decentralised BESS). Of this, 49 MW | 392 MWh is contracted with Australian Energy Market Operator (AEMO) through the LTESA. Timely delivery of projects such as this is a key NSW government policy mechanism to achieve its emissions reduction target to halve state-based emissions by 2030 and achieve net zero by 2050, as well as

forming a key contribution to the Federal Government 82% renewable target by 2030. Lightsource bp is committed to delivering this Project and meeting the obligations under our awarded LTESA.

2. Road upgrade staging - request

Lightsource bp are requesting the Planning Secretary's agreement to vary road upgrade timing under Schedule 2, Condition B7 of the Development Consent SSD-3396533 in order to limit the road upgrades required to be completed prior to construction to only those which are necessary for Project traffic; the works proposed on Transport for NSW controlled roads.

Specifically, we are requesting to be able to complete the following road upgrade works prior to the commencement of construction:

- Upgrade of Ringwood Road/Golden Highway intersection and
- Sealing of Barnett Street.

Prior to the use of Ringwood Road by any heavy vehicle requiring escort, Lightsource bp will upgrade the culverts at Bow River and Killoe Creek to accommodate two-way heavy vehicles, including B-doubles.

Additional road upgrade works along Ringwood Road and Wollara Road, except for upgrades within State Forest, will be completed within six months of construction commencing. Road upgrades within State Forest will be completed prior to commissioning.

3. Road upgrade staging - reasoning

The proposed changes would provide flexibility for culvert upgrades and community benefit associated road upgrades (Wollara Road and Ringwood Road) to be undertaken in parallel with the Golden Highway/ Ringwood Road intersection works, or alternatively, to allow for some or all of these road upgrades to be delivered concurrently with construction of the Temporary Workers Accommodation Facility (TWA Facility) and the solar farm.

Staging and amended timing for road upgrades were discussed prior to Development Consent being issued. DPHI advised that this request should form part of an application to the Planning Secretary, in order to provide transparency about changes to road work timing.

The EIS (Amendment Report 1; Traffic and Transport Impact Assessment [TTIA], Table 3-1, December 2023) stated that all road upgrades will be completed prior to construction. There are a number of reasons why this is no longer the most efficient or achievable approach:

1. The TTIA was prepared on the assumption that the construction workforce would be housed in Merriwa, and that there were no restrictions on available beds during road upgrades.
2. Additional delays in pre-construction works on the Golden Highway and Ringwood Road intersection have been incurred, with Transport for NSW unable to assess designs or review a works authorisation

deed (WAD) application until after Development Consent. Lightsource bp have been advised by Transport for NSW that the WAD approval process can take 3-6 months.

3. Select road upgrades proposed along Wollara Road for community benefit may take an indeterminate period of time to complete, as a result of challenges resolving tenure where the 1.2 km stretch of Wollara Road intersects with Tongo State Forest cadastral boundaries (Figure 1).

Our position is that it is no longer an efficient approach to complete all road upgrades as currently defined prior to construction. This is predominantly due to the change in workforce accommodation from being offsite at a planned workers accommodation facility in Merriwa to an onsite TWA Facility. The TTIA was developed on the assumption that the road crew could be housed in Merriwa, enabling all road upgrades to be done concurrently and in a timely manner.

Without access to the onsite TWA, road upgrades will be protracted as the workforce will be constrained by available beds in the surrounding area (estimated in the Project Accommodation and Employment Strategy to be approximately 14 beds, plus the potential for one or more rental properties).

We appreciate the necessity of completing works on or immediately adjacent to Golden Highway intersection and Barnett Street prior to construction commencing, however the culvert upgrades and Ringwood/Wollara Road upgrades are not required for construction of the TWA Facility, and therefore are not necessary to be completed ahead of this time.

The requirement for culvert upgrades relates to oversize over mass (OSOM) movements, which are programmed to commence in month 10 of the 27-month construction schedule. The commitment to widen and seal sections of Ringwood and Wollara Roads are a benefit for the local community rather than a necessity to enable the safe movement of construction traffic.

Allowing the TWA Facility to be commenced immediately following Golden Highway upgrades will enable the road crew to efficiently transition from public road upgrades onto internal access tracks without having to demobilise. The crew can also increase in number as they reduce reliance on available beds in the Merriwa region and instead utilise the initial stages of the TWA Facility.

Upgrades as part of the community benefit to area of Wollara Road which falls within State Forest (Figure 1) would require revocation of a private lease as well as realignment of the cadastral boundary, and a land swap with State Forest and/or alternative compensation for the area which would need to be formally removed from State Forest. The uncertain timeframe to complete these tasks makes it challenging to include as a condition precedent to construction commencing.

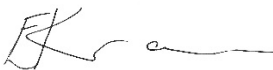


Figure 1 Area of Wollara Road which is outside of the cadastral road reserve boundary, and which falls in State Forest (shown in pink) or Crown Land (yellow)

These proposed amendments will assist Lightsource bp to efficiently deliver the Project, contribute green electrons to the national energy market in a timely manner and achieve committed milestones under the LTESA.

Please do not hesitate to reach out to either myself or Hajer Azher (Senior Development Manager, ph 8311 3194) if you would like to discuss any of the items presented in this request.

Sincerely,



Beth Kramer
Principal Environmental Planner, Lightsource bp
0428 379 894

Cc: Hajer Azher (Senior Development Manager) and Jennifer Zhan (Legal Counsel)