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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 under Condition B3 (Access Route)

Dear Iwan,

Lightsource bp is requesting the Planning Secretary's approval to make a change under Condition B3 of the Goulburn River Solar Farm Development Consent (SSD-33964533).

Condition B3 identifies the requirement that *'...all heavy vehicles and heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway / Ringwood Road intersection as shown in Figure 3 and Figure 4 in Appendix 4'*. While condition B3 references Figure 3 and Figure 4 in Appendix 4, it does not explicitly:

- require all heavy vehicles requiring escort to follow the route shown in Figure 3, or
- require all heavy vehicles to follow the route in Figure 4.

Condition B3 also states *'unless otherwise agreed by the Planning Secretary'*. The Planning Secretary approves the Traffic Management Plan (TMP) under Condition B10, including *'(a) details of the transport route to be used for development-related traffic'* and *'(e) (xvi) a traffic management system for managing heavy vehicles requiring escort'*. Approval of the TMP under Condition B10 could therefore be considered as the Planning Secretary agreeing to development-related traffic utilising an alternative transport route that has been specified in the TMP and consulted on with Transport for New South Wales (TfNSW), Upper Hunter Shire Council and Mid-Western Regional Council, in accordance with Condition B10.

On this basis, Lightsource bp considers that heavy vehicles and heavy vehicles requiring escort that utilise the Golden Highway / Ringwood Road intersection (as per Condition B3) and adhere to the transport route for development-related traffic and traffic management system for heavy vehicles requiring escort specified in the TMP (Condition B10), are compliant with the terms of the consent. Notwithstanding, Lightsource bp is seeking approval from the Planning Secretary for approval to use alternative travel routes prior to a heavy vehicle reaching the Golden Highway / Ringwood Road intersection.

Request

This request is to the Planning Secretary for:

1. An alternative traffic route for heavy vehicles (excluding heavy vehicles requiring escort) which approach the Golden Highway / Ringwood Road intersection from the west and use a turn-around location in Merriwa (see Figure 1 and Figure 2).
2. Flexibility for heavy vehicles requiring escort travel routes to reflect the final approved routes determined through the National Heavy Vehicle Regulator (NHVR) process for individual over size over mass (OSOM) movements.

All other conditions related to heavy vehicle movements, including heavy vehicles under escort, will continue to be met including:

- **Condition B1(a)(i)** – A maximum of 15 heavy vehicle movements per hour will be maintained.
- **Condition B4-B6** – Access will continue to be via the approved route using Ringwood and Wollara Road and the Golden Highway intersection.
- **Condition B10(e)(v)** – Scheduling will continue to avoid peak PM hours, where practicable.

No changes are sought to on-site access, intersection use, swept path performance, or local road upgrade obligations. This request is simply to provide flexibility in the approach to the Golden Highway / Ringwood Road intersection and allow for variation due to regional context and National Regulator requirements.

Justification for the request

Heavy vehicles

Whilst the majority of development-related traffic originates east of Ringwood Road, there are circumstances where traffic approach from the west and are required to turn around in order to achieve a left turn into Ringwood Road. This includes:

- Light vehicles of workers who live west of Ringwood Road
- Suppliers and contractors whose businesses are based west of Ringwood Road
- Suppliers with journeys originating in Mid-Western Regional Council local government area, limited to 'locally-based service providers' (defined and agreed upon in the TMP (s5.6))
- Development-related vehicles which are travelling from the east, but which miss the turn at Ringwood Road.

As noted previously, Condition B3 states '*Unless otherwise agreed by the Planning Secretary*'. The Planning Secretary approved TMP (under Condition B10) includes '*(a) details of the transport route to be used for development-related traffic*'. Of particular relevance to traffic originating from the west:

- Section 3.7 of the TMP (Turning Areas) contemplates traffic travelling to site from the west and turning around in Merriwa, noting that use of these local roads by construction (heavy) vehicles would be subject to swept paths and sight distance checks prior to their use by the Project and that Upper Hunter Shire Council would be consulted if regular use of the local road network in Merriwa is required.

- Section 5.6 of the TMP (Management of Construction Vehicle Routes) identifies that deliveries and supplier movements may originate west of the site but will approach Ringwood Road from the east (i.e., via a left turn), along Golden Highway.

Approval of the TMP under Condition B10 could therefore be considered as the Planning Secretary agreeing to development-related traffic utilising that alternative route.

Two suitable turning area have been identified to enable vehicles from the west to turn left into Ringwood Road. These turning areas, in order of preference, are:

1. Cullingral Road: industrial estate (Figure 1).
2. Merriwa town: Dutton Street, Mackenzie Street and Bow Street (Figure 2).



Figure 1 Turn around arrangements using Cullingral Road, east of Merriwa town, for vehicles arriving from west of the Project



Figure 2 Turn around arrangements in Merriwa for vehicles arriving from west of the Project

The turning area in Merriwa used to date by development-related vehicles accessing the Project site from the west includes Dutton, Blaxland and Bow Streets, as per the TMP approved in December 2024 and confirmed through consultation with Council as part of the Request to the Planning Secretary PA-83.

Cullingral Road is now the preferred turning area, however Dutton, Blaxland and Bow Streets may be used as a secondary option. Cullingral Road was suggested by Council as an alternative to minimise heavy vehicle traffic in Merriwa. This option was investigated and confirmed to be suitable, including through a site visit by Council, TfNSW and Lightsource bp, and by a trial run conducted by DTI using a typical 19m vehicle.

Cullingral Road can be safely accessed via right turn eastbound on Golden Highway via the existing BAR (basic right turn treatment) and traffic will re-join the Golden Highway via the existing acceleration lane. The turn into the Cullingral Road turning area (industrial estate) from Cullingral Road has good visibility and currently supports heavy vehicles. The turning area is on a no-through Council-managed road, with a Council stockpile at the end. The Project will continue to reinforce compliance with approved traffic routes and controls through driver inductions, toolbox talks and ongoing communication with transport providers. Compliance will be monitored, and any non-compliances will be addressed in accordance with project procedures.

Use of Cullingral Road turning area will:

- Be by development-related light vehicles and heavy vehicles (maximum 19m length)
- Support approximately 10-15 heavy vehicle movements per day. This may increase up to approximately 35 movements per day during the period of time covered by the heavy vehicle increase (from 55 to 85/day, for a period of five months (PA-99)).
- Receive maintenance prior to use by the Project, including slashing (already completed by Council), protection of the existing Telstra pole (already completed by Council), and placement of an additional

layer of gravel (to be completed by DTI, on behalf of Council). The last task would be completed under a *Roads Act 1993* section 138 approval.

- Be subject to a dilapidation survey prior to use by the Project and maintained in accordance with Condition of Consent B8.
- Road condition and amenity will be actively monitored throughout use, including dust, surface condition and stakeholder feedback. Where impacts are identified, mitigation measures will be implemented in real time, including additional maintenance or operational adjustments as required.
- Avoid school bus times with a school bus blackout period (7:30–8:00 AM and 3:20–4:00 PM), with all vehicle movements restricted during these times and managed via dispatch and driver communication to ensure compliance.
- Consider the outcomes of consultation with the businesses located in the Cullingral Road industrial area.
- Consider the outcomes of consultation with the businesses located in the Cullingral Road industrial area.

Heavy vehicles requiring escort

Heavy vehicles requiring escort for the project include, but are not limited to:

- Transformer
- Switch yard buildings
- Auxiliary service buildings
- Any other vehicle requiring a pilot or vehicle escort under the Heavy Vehicle National Law (HVNL).

All escorted movements must obtain a Class 1 OSOM permit from the NHVR. Under the HVNL, the NHVR:

- Determines the legal route for each OSOM movement
- Consults with the NSW Police, TfNSW, local councils and road managers
- Assesses bridges, culverts, pavements and clearances
- Specifies escort requirements, speeds, rest bays and timing
- May prohibit travel on unsuitable routes
- May require travel from specific ports or states.

High-risk Oversize Overmass (OSOM) loads, such as the main transformers for the solar farm, will be transported exclusively via the Brisbane route due to the specific route requirements and risk management considerations associated with these loads. Other OSOM deliveries not classified as high-risk OSOM will be transported either under an applicable exemption notice or via an NHVR permit, as appropriate. These lower-risk OSOM deliveries may include large but less complex components such as electrical infrastructure equipment, plant components, or prefabricated materials that do not require the same level of route control or escort arrangements as the transformer. This means the final approved OSOM routes may differ from the indicative mapping in Figure 3, where freight originates outside NSW, or where infrastructure constraints require an alternative approach to get to the Golden Highway.

The Project Environmental Impact Statement (EIS 2024), Traffic and Transport Impact Assessment (Appendix 11 of the EIS), and Traffic Management Plan (TMP) considered the most likely route for heavy vehicles requiring escort and acknowledged that final OSOM routes must ultimately be determined by the NHVR. Relevant extracts are summarised in Attachment A.

Justification

The request is administrative in nature and does not change the environmental impacts, traffic volumes, local road use, or the assessed performance of the Golden Highway / Ringwood Road intersection.

Condition B3 currently references Figures 3 and 4 in Appendix 4. Figure 4 is titled 'Transport Route – Barnett Street turnaround area', and the wording of Condition B3 suggests this figure is referenced primarily to confirm the location of the Golden Highway / Ringwood Road intersection rather than to restrict all regional approach paths to the site.

Condition B4 requires all vehicles associated with the development to access Ringwood Road via a left turn from then Golden Highway, and to exit via a left from Ringwood Road. Condition B5 requires all vehicles that need to travel east along the Golden Highway to use the Barnett Street turnaround point. The request under Condition B3 does not alter these obligations. All heavy vehicles and vehicles requiring escort will continue to:

1. Access the site via a left turn arrangement at the Golden Highway / Ringwood Road intersection, which Lightsource bp understands to be the primary intent of Condition B3 (B3 and B4),
2. Use the Barnett Street turnaround point when travelling east (B5)
3. Operate in accordance with the TMP (B10).

A new Figure has been prepared to accompany this request and will be included in the next iteration of the TMP. This illustrates a compliant approach route from the west and provides clarity on how development-related may safely and consistently approach the Golden Highway / Ringwood Road intersection for a left turn in.

The NHVR is the national statutory decision-maker for OSOM and escorted heavy vehicle movements. Its permit process requires:

- mandatory consultation with TfNSW, Council, NSW Police and other road managers
- route-specific engineering assessments
- bridge, culvert and pavement checks
- escort and timing requirements
- safety controls and travel conditions.

Allowing OSOM and heavy vehicles to use differing NHVR-approved regional approach routes ensures compliance with the Heavy Vehicle National Law while maintaining full alignment with the intent of Condition B3.

The NHVR process involves the same stakeholders and checks that the project would otherwise undertake independently, ensuring that any approved route is safe, feasible and appropriate for the vehicle type.

Consultation

Upper Hunter Shire Council were consulted on their preferred turning area in Merriwa in 2025 and confirmed that Dutton, Blaxland and Bow Street are acceptable for the purpose of facilitating access to the Golden Highway / Ringwood Road intersection from the west. This location was used as the turning route since approval was received for a temporary increase in heavy vehicle length in late June (SSD-33964533-PA-28). The residents along the turning point received a Keeping You Informed (KYI) slip (letter box drop on 15th July) advising of increased traffic activity in the area as a result of the Project. The KYI provided contact details for the Project.

All residents along the Dutton Street turning route receive monthly construction updates which includes details on how to get in touch with the Project for any questions or complaints. No complaints have been received by residents or businesses along the turning route.

Both Council and TfNSW were consulted on alternative routes for heavy vehicles requiring escort and the use of Cullingral Road as the new preferred turning area through consultation on the updated TMP (April 2026). No objections were raised.

The Project team have consulted directly with the neighbouring businesses to the Cullingral Road turning area to gain an appreciation of any concerns and identify mitigations. Consultation will continue throughout use.

Conclusion

The proposed request maintains the original intent of Condition B3, preserves all local traffic controls, and ensures that all heavy vehicle and vehicles requiring escort remain compliant with both the Development Consent and the NHVR permit framework.

Please do not hesitate to reach out 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: Glenn Tilley (Senior Project Manager)

Attachment A – Contemplation of OSOM route: planning documentation summary

Document	Section	Detail
EIS (May 2023)	6.9.3.2	<p>Notes that:</p> <p>OSOM vehicles would likely be transported to the site from Port of Newcastle via Industrial Drive, Pacific Highway, Newcastle Inner City Bypass, Newcastle Road, Hunter Expressway, New England Highway and Golden Highway.</p> <p>Suggests potential traffic management measures based on a high-level review of the indicative OSOM route.</p>
TTIA (part of EIS, May 2023)	5.0	<p>Recommends that:</p> <p>A detailed OSOM vehicle route assessment would be undertaken by the construction contractor and outlined in a Transport Management Plan. The Plan would discuss any traffic management measures required and include details on the OSOM vehicle route, duration, road closures, traffic detours, notifications and any required Traffic Guidance Schemes.</p>
TfNSW submission on the EIS		<p>TfNSW required the Project to address:</p> <p>Heavy vehicle and OSOM routes:</p> <ul style="list-style-type: none"> Identify the return routes for OSOMs. National Heavy Vehicle Regulator (NHVR) approved routes identified on the Restricted Access Maps (RAV MAP) are to be utilised for the heavy vehicle routes for the proposed development.
Amendment Report 1 (Dec 2023)	3.2.4	<p>OSOM vehicles are expected to travel to the site from Port of Newcastle via Industrial Drive, Pacific Highway, Newcastle Inner City Bypass, Newcastle Road, Hunter Expressway, New England Highway and Golden Highway.</p>
Amended TTIA (Dec 2023)	5.0	<p>A detailed OSOM vehicle route assessment would be undertaken by the construction contractor and outlined in the CTMP. The CTMP would discuss any traffic management measures required and include details on the OSOM vehicle route, duration, road closures, traffic detours, notifications and any required Traffic Guidance Schemes. This is expected to include:</p> <ul style="list-style-type: none"> using spotters at pinch points limiting OSOM movements to off-peak periods undertaking OSOM movements under police escort the use of manual traffic control at specific locations in accordance with an appropriately designed Traffic Guidance Scheme are required.
TMP (approved Dec 2024)	3.5.2	<p>Prior to any OSOM vehicles travelling to the development, the Construction Contractor will assess the loads and dimensional requirements, and if they are deemed to be oversize or over mass, conduct a review of all National Heavy Vehicle Regulator (NHVR) regulations in conjunction with Council /TfNSW regulations and request all necessary approvals and permits, as required. These management measures will be implemented by the Construction Contractor prior to any OSOM vehicles travelling to the development.</p> <p>At other locations along the route, traffic management measures are necessary, and would be confirmed by Lightsource bp’s Construction contractor during detailed investigation of the OSOM vehicle route at a later stage of the Project.</p>
TMP (approved Dec 2024)	3.6.3	<p>The requirement for off-peak travel will be dictated by the OSOM road access permit that loads of this nature dictate. Notwithstanding, the road access permit restrictions,</p>

Document	Section	Detail
		contractual arrangements entered into with specialist transport subcontractors will dictate this requirement.
TMP (approved Dec 2024)	5.9	OSOM vehicles described in Section 3.5.2 will be required to deliver large equipment to the site. These vehicles require a permit to access public roads with escort vehicles as part of a convoy. In obtaining a permit, the Construction Contractor will engage a transport logistics company to confirm the traffic management measures required to accommodate the OSOM loads, which will be detailed in a separate Transport Management Plan. The Transport Management Plan will include details such as the route, duration, road closures, traffic detours, notifications and any required TGS