

Lightsource Development Services Australia
Level 29, 420 George Street
Sydney
NSW 2000

Telephone 1800 570 663
www.lightsourcebp.com

15/01/2026

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 for additional heavy vehicle movements under Development Consent condition B1(a)

Dear Iwan,

Lightsource bp are requesting the Planning Secretary's written approval for an increase to the permitted number of heavy vehicle movements per day under Condition B1(a) of the Goulburn River Solar Farm Project (i.e. the Project) Development Consent (SSD-33964533).

Lightsource bp are requesting permission for a temporary increase from the current limit of 55 to 85 heavy vehicle movements per day for a period of five (5) months, to support the efficient delivery of solar panel modules and thermal sand required to maintain critical sequencing as part of the 585 megawatt peak (MWp) solar farm and 49 MW/562 MWh DC-BESS phase 1 construction scope.

After the proposed five months of increased movements, heavy vehicle movements drop to around 50 per day. There would be a significant reduction in heavy vehicle movements (down to approximately 10 per day) three months after the proposed increased movement period ceases.

The total number of vehicle movements per day will remain below the 130 assessed in the Project's traffic and transport impact assessment. The total number of vehicle movements over the life of the Project would remain unchanged by this proposal.

All other conditions related to heavy vehicle movements will continue to be met including (but not limited to):

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

Management and mitigation measures outlined in the project's Traffic Management Plan (TMP), approved on 19 December 2024, will continue to be implemented. The TMP will be updated to reflect this request, if approved.

This Request outlines:

- Background to the request
- Consideration of potential environmental and social impacts, and associated mitigation measures
- Stakeholder consultation
- Justification for the request
- Summary of mitigation measures, including those arising from stakeholder consultation.

Background

The Project received Development Consent (SSD-3396533) under Section 4.38 of the NSW Environmental Planning and Assessment Act 1979 on 22 August 2024 for the construction, operation and decommissioning of a 585 MWp solar farm. The Project includes the installation of up to one million photovoltaic solar panels, both a distributed current (DC) battery energy storage system (BESS) and standalone BESS, a substation connecting into the existing 500 KV transmission line that traverses the Project area, and road repairs and upgrades to Ringwood Road, Wollara Road, and the Golden Highway intersection.

The Project site is located at 2335 Wollara Road, approximately 28 kilometres southwest of Merriwa, within the Upper Hunter Local Government Area.

Current project milestones for the solar farm and DC-BESS include:

- Road upgrades commenced on the 7 February 2025 and will be completed in January 2026.
- Early access to site for critical construction activities commenced on 14 April 2025 to allow limited civil works associated with internal access roads, the temporary workers accommodation (TWA) facility, and substation bench preparation.
- Full construction commenced on 29 May 2025, following practical completion of the Golden Highway/Ringwood Road intersection (in accordance with condition B7).
- The TWA Facility became operational in September 2025 and is now completed, with 400 beds available.
- Approximately 40% of earthworks have been completed, with earthworks due to be completed mid-2026.
- Piling started in October, with the first panels due to be installed in December 2025.
- Underground cabling is due to commence in early 2026.
- The substation bench is in place and the auxiliary services building (which houses switchyard controls) arrived to site in late December.

Condition B1(a) of the Development Consent currently limits heavy vehicle movements to 55 per day, with a maximum of 15 movements per hour, unless otherwise approved by the Planning Secretary. As defined in the consent, a vehicle movement includes one vehicle entering and leaving the site.

Under the current limit of 55 heavy vehicle movements per day, the average across the 11-hour workday is five (5) movements per hour. While this may fluctuate, particularly to avoid the PM peak, it remains well within the approved maximum of 15 movements per hour.

Request

This request is to the Planning Secretary for a temporary increase in the number of heavy vehicle movements generated by the development per day under Condition B1(a). We are requesting an increase to 85 heavy vehicle movements per day (a maximum of 15 heavy vehicle movements per hour) across a five (5) month period.

Consideration of potential environmental impacts

A qualitative assessment of potential environmental impacts resulting from the proposed increase in vehicle movements has been undertaken as part of this request. Key environmental aspects including traffic, road maintenance, and noise are discussed below, with other environmental aspects assessed in **Table 6**.

Traffic

Construction traffic

The Amended TTIA (Turnbull, 2023) assessed a total of 130 daily movements, consisting of 60 light vehicles, 55 heavy vehicles, and 15 shuttle buses.

The inclusion of the TWA facility has significantly reduced daily light vehicle movements, as outlined in the Amended TTIA. Car-pooling is strongly encouraged for visitors to site or any workers staying in the community. Now that the TWA is in operation, buses will commence running every Wednesday from 7th January 2026, at the change of roster swing for drive in/drive out workers. In addition, there is a secure parking area in Merriwa that will be used as a park-and-ride facility from 7th January 2026, with a minibus running to and from the TWA.

This means that overall construction traffic movements have been reduced, creating capacity within the existing road network to safely accommodate an increase in heavy vehicle movements without creating additional or new traffic impacts.

This request to the Planning Secretary contemplates heavy vehicle movements over the remaining duration of the Goulburn River solar farm and Phase 1 DC-BESS project, from the end of 2025 to Friday 30th April 2027.

- The projected total number of heavy vehicle movements is approximately 18,230 over 460 remaining working days, averaging 40 heavy vehicle movements per day.
- The peak heavy vehicle movements are from January 2026 until May 2026 (or the first five months from approval of this request). During this period, all civil works, importation of civil materials, cable works and importation of cable, and importation and installation of solar infrastructure will occur.
- From June 2026 (or after five months of increased movements), heavy vehicle movements drop very quickly to around 50 per day.
- There is a dramatic drop-off as the electrical works are completed, with approximately 10 heavy vehicle movements per day anticipated by the end of September 2026.

The total number of vehicle movements per day will remain below the 130 assessed in the TTIA. The total number of vehicle movements over the life of the project would remain unchanged by this proposal.

Daily movement tracking is already undertaken in accordance with Section 5.6 of the Project Traffic Management Plan (TMP) (Turnbull, 2024), which was approved by DPHI on 19 December 2024. This will continue ensuring compliance with the conditions and real time minimisation of impacts via responsive adjustments to emerging issues.

Onsite HV planning and control is managed by the Contractor’s Logistics Team and has five components:

- A whole-of-project HV movement histogram has been exported from the project’s resource-loaded Primavera planning software.
- There is routine update of the whole-of-project HV movement histogram each time a new subcontractor is engaged, and their explicit truck movements can be defined.
- Subcontractors are obliged to provide a two-weekly look-ahead on rolling weekly basis, to further refine the histogram for the coming fortnight. The Logistics Team balances HV movements to keep below the cap.
- Subcontractors attend a daily site meeting to re-confirm HV numbers for the next day. If numbers are too high, the Logistics Team will adjudicate which movements can occur.
- As an additional control, site security monitor HV entries at the main gate, and will cease granting access if the cap is reached.

Intersection performance

The Amended TTIA demonstrates the existing weekday morning and evening peak periods to operate at a Level of Service (LOS) A, with spare capacity, low average delays, and minimal queues on all approaches – see **Table 1** below.

Table 1: Existing intersection performance (2022) - Golden Highway / Ringwood Road

Period	Approach	DOS	Average delay (sec/veh)	LOS	95% back of queue (m)
Weekday morning peak (7:15am to 8:15am)	Golden Highway eastbound	0.04	8	A	<5
	Golden Highway westbound	0.04	9	A	<5
	Ringwood Road northbound	0.02	7	A	<5
	Overall intersection	0.04	9	A	<5
Weekday evening peak (3:00pm to 4:00pm)	Golden Highway eastbound	0.06	8	A	<5
	Golden Highway westbound	0.06	9	A	<5
	Ringwood Road northbound	0.01	7	A	<5
	Overall intersection	0.06	9	A	<5

Source: Table 2-4 of the Amended TTIA (Turnbull, 2023)

It determined that the addition of construction traffic from the Project would result in minimal impact, with average delays increasing by up to one second and no change to the LOS – see **Table 2** below.

Table 2: Intersection performance during construction (Project only) - Golden Highway / Ringwood Road

Approach and peak period	2025 base				2025 construction			
	DOS	Average delay (sec/veh)	LOS	95% back of queue (m)	DOS	Average delay (sec/veh)	LOS	95% back of queue (m)
Weekday morning peak (7:15am to 8:15am)								
Golden Highway eastbound	0.05	8	A	<5	0.05	8	A	<5
Golden Highway westbound	0.05	9	A	<5	0.07	9	A	<5
Ringwood Road northbound	0.02	7	A	<5	0.02	8	A	<5
Overall intersection	0.05	9	A	<5	0.07	9	A	<5
Weekday evening peak (3:00pm to 4:00pm)								
Golden Highway eastbound	0.07	8	A	<5	0.12	8	A	<5
Golden Highway westbound	0.06	9	A	<5	0.06	10	A	<5
Ringwood Road northbound	0.01	7	A	<5	0.06	9	A	<5
Overall intersection	0.07	9	A	<5	0.12	10	A	<5

Source: Table 4.2 of the Amended TTIA (Turnbull, 2023)

The Amended TTIA also assessed intersection performance during construction under cumulative traffic volumes from other projects utilising the same section of the Golden Highway. With the addition of project-related traffic, average delays at the Golden Highway/Ringwood Road intersection were found to increase by just four seconds in the morning peak and three seconds in the evening peak. Despite this minor increase, the intersection would continue to operate with spare capacity, at LOS A in the morning and LOS B in the evening – see Table 3. It should be noted that cumulative volumes assessed within the Amended TTIA were conservative estimates based on available information at the time.

Table 3: Intersection performance during construction (cumulative) - Golden Highway / Ringwood Road

Approach and peak period	2025 cumulative base				2025 cumulative construction			
	DOS	Average delay (sec/veh)	LOS	95% back of queue (m)	DOS	Average delay (sec/veh)	LOS	95% back of queue (m)
Weekday morning peak (7:15am to 8:15am)								
Golden Highway eastbound	0.15	9	A	<5	0.15	10	A	<5
Golden Highway westbound	0.19	9	A	<5	0.19	9	A	<5
Ringwood Road northbound	0.03	12	A	<5	0.04	13	A	<5
Overall intersection	0.19	9	A	<5	0.19	13	A	<5
Weekday evening peak (3:00pm to 4:00pm)								
Golden Highway eastbound	0.21	8	A	<5	0.26	8	A	<5
Golden Highway westbound	0.16	9	A	<5	0.16	10	A	<5
Ringwood Road northbound	0.01	12	A	<5	0.07	15	B	<5
Overall intersection	0.21	12	A	<5	0.26	15	B	<5

Source: Table 4.3 of the Amended TTIA (Turnbull, 2023)

Based on the Amended TTIA, the Golden Highway/Ringwood Road intersection is expected to continue operating at LOS A or LOS B under the estimated cumulative traffic volumes. The proposed increase of 20 additional heavy vehicle movements per day (averaging two per hour) is not anticipated to affect intersection performance. As such, no further consideration of other traffic and transport matters, such as turn warrants, was deemed necessary, as they remain consistent with the original Amended TTIA findings.

Mitigation and management

In addition to those measures within the approved TMP, the Project is currently implementing additional mitigation measures to improve driver behaviour, reduce the potential for speeding and improve compliance with Conditions B4 and B5 (which require a left turn in, left turn out, and for east bound traffic to turn at Barnett Street).

Additional mitigation measures include:

- **Speed reductions:** Transport for NSW have recently advised the Goulburn River Solar Farm project team and Council that they have approved a reduction in the gazetted speeds along Ringwood and Wollara Roads, from 100km/hr down to 80km/hr on sealed road and 60km/hr on unsealed, to the solar farm entrance. This change has come about through requests from community members as well as advocacy by the solar farm project team. We understand that the permanent speed signage will be installed to reflect these changes in late January 2026. In the meantime, the solar farm project team have recently implemented reduced speed limits for solar farm project traffic – down to 80km/hr on sealed roads and 60km/hr on unsealed roads.
- **Traffic data collection:** The solar farm project team are working to get a clear picture of traffic on Ringwood/Wollara Road. To do this, together with Council, we have deployed two sets of Traffic Counter-Classifiers. These are currently gathering comprehensive data - including vehicle volume, speed, vehicle type and the direction of traffic flow. This data will help the project and Council assess potential issues and consider additional mitigations.
- **Consultation with road authorities:** The solar farm project team have regular consultation with both Council and TfNSW. Recently we have established a series of meetings with the TfNSW Regional Community Partnering Team and other stakeholders to discuss opportunities to further improve safety for road users, particularly at the Golden Highway intersection, as well as to increase compliance with conditions B4 and B5.
- **Compliance with condition B4 and B5:** The conditions for turn-in and turn-out of Ringwood Road, and the use of the turn-around at Barnett Street are communicated repeatedly and consistently. The mandatory project induction includes details of the conditions and are again repeated at the site familiarisation attended by every worker. Workers and HV drivers are required to sign a “Driver’s code of conduct” which expressly details conditions B4 and B5. Whilst delivery drivers are not required to go through the full Project induction, they must physically present a ‘vehicle route acknowledgement’ in order to enter the site.

Furthermore, the project has implemented CCTV monitoring of Ringwood/Golden Highway intersection and Barnett Street. Any non-compliant turns are compared to vehicle data from site security, and should the vehicle be related to the project, disciplinary action is taken.

To date 1,115 people have been inducted by the Project. With the addition of approximately 300 delivery drivers, there has been over 1,400 people who could have driven to site. There have been 42

non-compliances recorded against conditions B4 and B5, representing under 3% of all Project drivers. Of these 42 drivers, 37 have been dismissed from the Project.

Additional mitigation measures will be included in an upcoming update to the TMP.

Road maintenance

Condition B8 of the development consent requires the Project team to repair Ringwood and Wollara Roads where the roads have been damaged due to development-related traffic.

DT Infrastructure hold a Section 138 approval from Council under the *Roads Act 1993* which allows the Project team to conduct maintenance works on the public road. Maintenance works on the section of Wollara Road within Goulburn River National Park are undertaken by or on behalf of Council, under a consent issued to Council by the NSW National Parks and Wildlife Service.

In November, the Project completed a second round of pavement maintenance works on the sections of Ringwood and Wollara Roads which are outside the road upgrade works extent.

Mitigation and management

Potholes and dilapidation on Ringwood and Wollara Roads will remain a challenge due to construction traffic and adverse weather conditions. To better address this going forward, ongoing monitoring will be undertaken monthly, with planned maintenance scheduled quarterly.

Depending on the rate of deterioration, traffic volumes, and seasonal impacts, the frequency of inspections, monitoring activities, and planned maintenance may need to increase or decrease. This approach will ensure that emerging issues are identified early and addressed in a timely and consistent manner.

Noise

Road traffic noise

The proposed increase of 30 heavy vehicle movements per day (averaging three per hour) is not expected to significantly alter traffic noise impacts as assessed in the Noise and Vibration Impact Assessment (NVIA) EIS (Umwelt, 2023) and the NVIA Addendum Report (Umwelt, 2023).

The nearest potentially affected receivers are:

- **Receiver R11** – 549 Ringwood Road, Merriwa (approximately 70 metres from Ringwood Road/Wollara Road); and
- **Receiver R110** – 6210-6212 Golden Highway, Merriwa (approximately 120 metres from the Barnett Street turning area).

The NVIA EIS and NVIA Addendum notes that predicted traffic noise levels will meet the Road Noise Policy criteria by at least 10 dB – see **Table 4** and **Table 5** below. The additional heavy vehicle movements proposed under this request are well within the assessed thresholds and are unlikely to result in an exceedance of this criterion.

As noted above, light vehicle movements have also decreased as a result of the on-site TWA Facility, further reducing assessed impacts.

Table 4: Predicted Traffic Noise Levels, LAeq, dB(A)

Receiver	Time Period	RNP criteria	Existing traffic noise levels	Combined traffic noise levels	Noise Level Change due to Project	Comply / Exceed
549 Ringwood Rd, Merriwa	Day - LAeq(15 hour) (7.00 am–10.00 pm)	60	45	50	N/A ¹	Complies
	Night - LAeq(9 hour) (10.00 pm–7.00 am)	55	34	44	N/A ¹	Complies

Note: ¹ Change in noise level assessment is not applicable if the predicted noise level is below the noise limit.

Source: Table 7.2 of the NVIA EIS (Umwelt, 2023)

Table 5: Predicted Traffic Noise Levels, LAeq, dB(A)

Receiver	Time Period	RNP criteria	Combined traffic noise levels	Comply / Exceed
6210-6212 Golden Highway, Merriwa	Day LAeq(1 hour)	55 ¹	44	Complies

Notes: ¹ The road noise from Barnett Street has been assessed against the LAeq,1hour daytime criterion for a Local Road.

Source: Table 5.2 of the NVIA Addendum (Umwelt, 2023)

Mitigation and management

No additional mitigation measures are proposed to manage noise-related impacts associated with the increase in vehicle movements outside of those presented within the NVIA EIS and NVIA Addendum.

Lightsource bp will incorporate the increased traffic movements within relevant environmental management documentation, including the Construction Environmental Management Plan (CEMP) and construction noise management sub-plan as a minimum.

Qualitative assessment of other environmental aspects

Table 6 below provides a qualitative assessment of other environmental aspects associated with the proposed increase in vehicle movements as discussed in this request.

Table 6: Qualitative Assessment of Environmental Impacts

Environmental Aspect	Qualitative Assessment	Additional Mitigation and Management Measures
Biodiversity	There is potential for additional fauna vehicle strike to occur with the increase in vehicle movements proposed under this request, however it is not anticipated to change the level of impact assessed within the Amended BDAR (Umwelt, 2023).	No additional mitigation and management measures are required as a result of the increased vehicle movements. Application of mitigation and managements as identified in the approved Biodiversity Management Plan (BMP) will continue to apply.
Aboriginal Cultural and Historic Heritage	The increase in vehicle movements will be confined to the existing road corridor, no additional disturbance or impacts to Aboriginal cultural or historic heritage are anticipated.	No additional mitigation and management measures are required as a result of the increased vehicle movements. Application of mitigation and managements as identified in the approved Heritage Management Plan (HMP) will continue to apply.

Environmental Aspect	Qualitative Assessment	Additional Mitigation and Management Measures
Soils and Land Use	The increase in vehicle movements will be confined to the existing road corridor, no additional disturbance or impacts to soils and/or land uses are anticipated.	No additional mitigation and management measures are required as a result of the increased vehicle movements Application of mitigation and managements as identified in the EIS and Amendment Reports (1 and 2) will continue to apply.
Amenity (i.e. Visual and Air Quality/Dust)	There is potential for additional dust to be generated as a result of the increased vehicle movements. However, given the scale of increase (i.e. on average two (2) movements per hour), this is not anticipated to increase the level of impact assessed within the EIS and Amendment Reports (1 and 2).	No additional mitigation and management measures are required as a result of the increased vehicle movements. Application of mitigation and managements as identified in the EIS and Amendment Reports (1 and 2) will continue to apply.
Social and Economic	The increase in vehicle movements could be perceived as an increase in impact by the community. Lightsource bp will consult with the local community to notify them of the proposed increase in vehicle movements.	No additional mitigation and management measures are required as a result of the increased vehicle movements Application of mitigation and managements as identified in the EIS and Amendment Reports (1 and 2) will continue to apply.
Hazards and Risk	The increase in vehicle movements will be confined to the existing road corridor, no additional disturbance or increase in hazards and risk are anticipated.	No additional mitigation and management measures are required as a result of the increased vehicle movements. Application of mitigation and managements as identified in the EIS and Amendment Reports (1 and 2) will continue to apply.
Water	The increase in vehicle movements will be confined to the existing road corridor, no additional disturbance or impacts to water resources are anticipated.	No additional mitigation and management measures are required as a result of the increased vehicle movements. Application of mitigation and managements as identified in the EIS and Amendment Reports (1 and 2) will continue to apply.

Consideration of potential social impacts

Traffic management and the condition of local roads have been primary concerns expressed by the community throughout the Environmental Impact Statement (EIS) process and ongoing construction phases.

The submission of this request has been postponed until the majority of road upgrades have been completed and the second phase of maintenance along Ringwood and Wollara Roads has been finalised. The enhanced condition of the local road network, combined with a demonstrated commitment to repairing development-related damage, will instill greater confidence within the community that heavy vehicle movements will be effectively managed to minimise impacts on local residents.

Feedback from the community and observations from the Project team will continue to drive responsive mitigation measures.

Stakeholder Consultation

Lightsource bp have consulted with key stakeholders in anticipation of this request (Table 6).

The project sends out a monthly newsletter to 1,455 residents from Gungal to Casillis. Face-to-face monthly drop-in sessions occur in Merriwa, so that the project team can answer questions and hear residents' thoughts.

For neighbours directly affected by specific work, like those on Ringwood and Wollara Roads, the project gives them a heads-up at least a week before any activity, like drone surveys or extended hours, so they are always kept in the loop.

Feedback is important to the project, so there are mechanisms in place to reach DT Infrastructure anytime on, 1300 429 152 or at goulburnriversolar@dtinfrastructure.com.au with any questions or concerns.

Table 6 Stakeholder consultation to inform this request

Stakeholder	Consultation format	Outcome
Upper Hunter Shire Council	The prospect of a temporary increase in heavy vehicle numbers has been discussed at meetings and in phone conversations between approximately July 2025 and the present. At a phone meeting 9/12/2025, the specific nature of the request was discussed (increase to 85 for a period of five months). This request was provided to Council as a consultation draft on 16 Dec 2025.	Council confirmed no objections on 15 Jan 2026, subject to meeting TfNSW's conditions of endorsement stated in its correspondence dated 22 December 2025.
Transport for New South Wales	This request was provided to TfNSW as a consultation draft on 16 Dec 2025.	TfNSW confirmed no objections on 22 Dec 2025, subject to a number of conditions. These are copied
Community (general)	The October 2025 Construction Update noted that the project was seeking a temporary increase in daily traffic movements (see Figure 1) which was distributed to the email list and to residents of Gungal, Merriwa and Cassilis. The Jan/Feb 2026 Construction Update provides additional detail and is being distributed mid-January (see Figure 2).	Questions received from two key interested stakeholders (see below)
Community (key interested stakeholders)	Phone conversation(s) and discussions during the November Community Coffee and Cake Connect session (5 th November). Subsequent phone conversations (December, January). These conversations identified that the community is concerned that increased heavy vehicle movements would exacerbate damage on the local road network. Concerns raised about driver behaviour, including potentially speeding heavy vehicles.	Reassured the community that the increase to heavy vehicle numbers would not occur until the road upgrades were complete and the on-going road maintenance approach was established. Mitigations discussed are committed to within this Request (see sections above).

Construction Activity & Project Traffic

Your safety is our absolute priority. We are committed to keeping the roads safe and in good condition throughout the project.

As the project progresses, there will be an increase in heavy vehicle movements in the area. We urge all residents and road users to take extra care and stay aware of larger vehicles when travelling.

To ensure this, our traffic management measures are firmly in place to help minimise disruption and enhance safety. We are also continuously refining our approach to ensure road maintenance is timely and responsive wherever it's needed.

Our team is currently assessing the option of temporarily increasing our maximum daily traffic movements over a defined period of time (a few months) to accommodate peak deliveries to site. Importantly, this change will not increase the overall total number of vehicle movements for the project; it only affects how those movements are distributed over the course of the project's life. We are consulting with Upper Hunter Shire Council and Transport for NSW on this proposal, with safety being a primary consideration, before we make an application to the Department of Planning, Housing and Infrastructure.

Figure 1 Excerpt from October Construction Update, shared with the community

Request to the Planning Secretary: Temporary Increase in Heavy Vehicle Movements

Requests to the Planning Secretary are the standard method for most change requests, where permitted by the relevant consent condition.

We propose to temporarily increase the daily limit on heavy vehicle movements from **55 to 85 per day** for **five months**. This increase will:

- Support efficient delivery of solar panel modules and thermal sand (necessary for underground cables)
- Maintain critical construction sequencing
- Allow heavy vehicle numbers to reduce after the five-month period to around 50 per day, rapidly dropping further to about 10 per day after another three months.

Important:

- The total daily vehicle movements (heavy + light) will never exceed **130**, as assessed in the Project's original traffic impact study.
- The total number of vehicle movements over the Project remains unchanged by this proposal.

To date, we have submitted a number of requests to the Planning Secretary, consulting with community members and stakeholders as required. These requests have related to construction timing, out of hours works, temporary increases in vehicle length and vehicle routes. You can find these requests and associated approvals on the Project website (<https://lightsourcebp.com/au/project/goulburn-river-solar/>).

Figure 2 Excerpt from January/February Construction Update, shared with the community

TfNSW conditions for endorsement of the Planning Secretary request

TfNSW have endorsed the progression of the Secretary Request to DPHI for approval to amend Condition B1(a)(i) for temporary additional heavy vehicle movements based on the information provided as identified in the information submitted "*Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for additional heavy vehicle movements under Development Consent condition B1(a) prepared by Lightsource bp dated 16 December 2025*", provided the following conditions are met:

- The approval of the Secretary's request is to stipulate that the temporary increase to 85 heavy vehicle movements only apply to the approved site access point. They are to align with the information provided as part of the proponent's Secretary's request letter for Goulburn River Solar Farm, prepared by Lightsource bp, dated 16 December 2025.
- The approval of the Secretary's request is to be conditioned to 5 months, with further information on the timing within the project schedule to be provided as part of the Traffic Management Plan.
- The increase in the heavy vehicle movements and commencement must not occur until the completion of the access and intersection upgrade works (Ringwood and Wollara Roads).
- The proposed additional mitigation measures to improve driver behaviour, reduce the potential for speeding and increase compliance with Conditions B4 and B5 are to be provided as part of the TMP and Driver Code of Conduct.
- Revise the traffic management plan to capture the conditions stipulated within points 1 to 4.
- Compliance with the current traffic routes and volumes in conditions B1 to B5 and condition B10 of the Goulburn River Solar Farm development consent.

Justification

The requested increase from 55 to 85 daily heavy vehicle movements will enable greater efficiency during the critical solar panel delivery phase of construction. This stage requires a high volume of materials to be delivered within a narrow timeframe, and the increased allowance will ease scheduling constraints, reduce

pressure on logistics, and minimise the risk of delivery-related delays that could disrupt project works and milestones.

The proposed change equates to an average of approximately eight heavy vehicle movements per hour across the 11-hour working day, an increase of three heavy vehicle movements per hour from the current average, and remains well within the approved hourly maximum of 15 movements. It is also noted that this increase is temporary, limited to a period of approximately five months.

The proposed increase will not result in a net increase in overall traffic volumes on the local network. The establishment of the on-site TWA facility has significantly reduced light vehicle movements, offsetting the proposed increase in heavy vehicle movements. Total daily traffic will remain within the limits assessed in the Amended TTIA.

The local road network has sufficient capacity to accommodate the change and no adverse impacts are expected. All relevant conditions of consent, including road maintenance provisions under the VPA and traffic management and mitigation measures outlined in the TMP, will remain in place and continue to be implemented.

The proposed increase is short-term, manageable, and operationally necessary, and can be implemented without additional risk to road safety or community amenity.

Summary of Mitigation Measures

This document describes a number of mitigation measures which the Project has already implemented ahead of submitting the request to increase heavy vehicle numbers. TfNSW have provided additional conditions, which their support is contingent on.

These measures are summarised in **Table 7**.

Table 7 Summary of mitigation measures related to this Planning Secretary request

Mitigation Measure	Description
Site access point	Temporarily increased numbers of heavy vehicle movements are limited to use of approved site access point(s).
Consent compliance	All movements to be compliant with Conditions B1 to B5, and B10.
Timing	Limited to a five-month period. Must not commence until Ringwood and Wollara Road upgrades are completed. Details on timing within the project schedule to be provided within updated TMP.
Speed reductions	Project adoption of reduced speed limits for construction traffic (80km/hr on sealed local roads, 60km/hr on unsealed), ahead of pending legal speed limit reduction.
Traffic data collection	Use of Traffic Counter-Classifiers to collect data about Project traffic on local roads, including vehicle volume, speed, vehicle type and the direction of traffic flow. This data will help the project and Council assess potential issues and consider additional mitigations.
Compliance with Conditions B5 and B6	The mandatory project induction includes details of the conditions and are again repeated at the site familiarisation attended by every worker. Workers and HV drivers are required to sign a “Driver’s code of conduct” which expressly details conditions B4 and B5.

Mitigation Measure	Description
	<p>Whilst delivery drivers are not required to go through the full Project induction, they must physically present a 'vehicle route acknowledgement' in order to enter the site.</p> <p>Ongoing CCTV monitoring of Ringwood/Golden Highway intersection and Barnett Street. Any non-compliant turns are compared to vehicle data from site security, and should the vehicle be related to the project, disciplinary action is taken.</p>
Collaboration with road managers	Project team to continue to work collaboratively with TfNSW and Council to identify and implement actions to further improve road safety for users.
Public road repair	On-going monitoring of Ringwood and Wollara Road condition will be undertaken monthly, with planned maintenance scheduled quarterly (or as required).
Construction Noise Management Sub-plan and CEMP	<p>No additional mitigation measures are proposed to manage noise-related impacts associated with the increase in vehicle movements outside of those presented within the NVIA EIS and NVIA Addendum.</p> <p>Increased traffic movements will be incorporated into relevant environmental management documentation, including the CEMP and construction noise management sub-plan as a minimum.</p>
Traffic management plan	TMP and Drivers Code of Conduct to be updated with timing of heavy vehicle movements and additional mitigation measures to improve driver behaviour, reduce the potential for speeding and increase compliance with Conditions B4 and B5

Conclusion

In accordance with Condition B1(a) of the Development Consent, Lightsource bp requests the Planning Secretary's written approval to vary the permitted maximum heavy vehicle movements from 55 to 85 per day across a five (5) month period.

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), Michelle Housego (Senior HSE Advisor)