lightsource bp

26 June 2026

NSW Department of Planning, Industry and Environment
Attn: Ann Hagerthy
516 High Street
Maitland NSW 2320

Goulburn River Solar Farm (SSD 33964533)
Response to Independent Environmental No.3 Audit Findings (14 May 2026)

Dear Ann,

In accordance with Condition C17 of State significant development consent (SSD 33964533) for the Goulburn River Solar Farm (the Project), I am writing to the Department of Planning, Housing and Industry (DPHI) to detail Lightsource bp's response to the findings of the Project's third construction Independent Environmental Audit (IEA#3).

This response should be read in conjunction with the Independent Audit Report - SSD33964533_IEA#3_Audit_Report_May26.

During the audit period (19 November 2025 – 14 May 2026), Lightsource bp self-reported thirty-five (35) non-compliances to the DPHI (*Table 2: Self-Reported Non-Compliances*), and DPHI recorded two (2) breaches (*Table 3: DPHI Identified Non-Compliances*). The Independent Auditor also identified one (1) non-compliances with Condition B21 (dust management). Each of these findings constitutes a non-compliance with Condition A3.

The audit identified non-compliances are listed below, with further details provided in *Table 1: Audit Identified Non-Compliances.*

A3. *The development may only be carried out:*
(a) in compliance with the conditions of this consent;
(b) in accordance with all written directions of the Planning Secretary;
(c) generally in accordance with the EIS; and
(d) generally in accordance with the Development Layout in Appendix 1.

B21. *The Applicant must minimise the dust generated by the development.*

The audit also recorded five (5) Opportunities for Improvement (OFI) during the site inspection and audit interviews with further detail provided in *Table 4: Opportunities for Improvement.*

The Independent Environment Audit Report and this response to the audit findings will be made available on the Project's public website within 60 days of submission to the Planning Secretary, in accordance with Condition C16(c) of the consent.

Please do not hesitate to reach out on 0409 601 473 or at diana.mitchell@lightsourcebp.com if you would like to discuss further.

Sincerely,

Diana Mitchell
Director of Planning, Australia & New Zealand

Table 1: Audit Identified Non-Compliances

IEA#3 ID:	CoC No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proposed Action/Action Taken/Response	Proposed Action Due Date
GRSF-03_NC-01	A3.	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally, in accordance with the EIS; and generally, in accordance with the Development Layout in Appendix 1	The Auditor considers that CoA A3 (a) has not been complied with, given the: • 35-self-reported NCs; • Two (2) DPHI identified NCs; and • One (1) NC identified during IEA #3. **Recommendations** Nil	Non-compliance notification submitted to DPHI 24/6/26 Ref: SSD-33964533-PA-143	N/A
GRSF-03_NC-39	B21	**Dust** The Applicant must minimise the dust generated by the development	Section 5 of DTIs Dust Action Management Plan (DAMP) sets out physical / engineering controls for stockpiles, including height limits of <2m, requirements to profile and compact batters and apply temporary covers such as soil binders, geofabric, hessian or hydromulch (where required). During the site inspection the Auditor observed an area which was being used to stockpile site won spoil, in preparation for screening to remove unsuitable rocks prior to being used as backfill. The stockpiles had been built over 2m high with no profiling or covers applied. Given the size and scale of the stockpiles, the Auditor considered them to present an air quality risk should a significant wind event occur. **Recommendation** It is understood that Lightsource bp and DTI are in the process of obtaining a planning modification to undertake screening of materials on Site, which will be followed by an Environmental Protection Licence (EPL) to undertake the activity. Given the uncertainty around the timeframes required to obtain these approvals before the screening activity can commence, the Auditor suggests that DTI should consider all feasible and reasonable methods to control dust emissions from the stockpile area.	The stockpile area identified by the Auditor comprises site-won material temporarily stockpiled pending determination of the planning modification and associated approvals required to undertake material screening activities on site. Following the audit, DTI undertook a review of the stockpile area and observed that the stockpiles have undergone substantial natural revegetation, with established vegetation providing effective surface stabilisation and reducing the potential for wind erosion and dust generation. Based on current site conditions, DTI considers the stockpile area to present a low dust risk. The area will continue to be inspected and monitored as part of the Projects routine environmental inspection program. In addition, a project-specific ERSED plan has been prepared for the stockpile area. The plan includes measures for stockpile management, runoff control, batter stabilisation and progressive application of temporary stabilisation measures were considered necessary and practicable. The stockpile area forms part of the Project's ongoing dust management and inspection regime under the Dust Action Management Plan (DAMP). Dust suppression and stabilisation measures, including water cart application, soil binders and other temporary surface treatments, will be implemented where having regard to prevailing weather conditions, construction activities and observed dust risk DTI considers that the existing site conditions, together with management measures incorporated within the ERSED Plan and DAMP, provide an appropriate level of control to minimise the potential for dust generation from the stockpile area pending determination of the planning modification and commencement of proposed screening activities. Non-compliance notification submitted to DPHI 24/6/26 Ref: SSD-33964533-PA-143	14 June 2026 Completed Ongoing inspection and monitoring

Table 1: Self-Reported Non-Compliances –(Refer IEA#3 Report Audit Findings- Table E.1.)

IEA#3 ID:	CoC No.	Compliance Requirement	Independent Audit Findings and Recommendations
GRSF-03_NC-14	B3	**Access Route** Unless otherwise agreed by the Planning Secretary, 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.	Closed
GRSF-03_NC-03 **GRSF-03_NC-04** **GRSF-03_NC-07** **GRSF-03_NC-08** **GRSF-03_NC-09** **GRSF-03_NC-11** **GRSF-03_NC-12** **GRSF-03_NC-13** **GRSF-03_NC-15** **GRSF-03_NC-16** **GRSF-03_NC-17** **GRSF-03_NC-18** **GRSF-03_NC-19** **GRSF-03_NC-20** **GRSF-03_NC-21** **GRSF-03_NC-22** **GRSF-03_NC-23** **GRSF-03_NC-25** **GRSF-03_NC-30**	B4 (a)	**Access Route** All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (a) must access Ringwood Road by turning left from the Golden Highway only, as shown in Figure 4 in Appendix 4;	Closed
GRSF-03_NC-10 **GRSF-03_NC-24** **GRSF-03_NC-26** **GRSF-03_NC-27** **GRSF-03_NC-28** **GRSF-03_NC-29** **GRSF-03_NC-31** **GRSF-03_NC-32** **GRSF-03_NC-33** **GRSF-03_NC-34** **GRSF-03_NC-35** **GRSF-03_NC-36**	B4 (b)	**Access Route** All vehicles (excluding heavy vehicles requiring escort) associated with the development accessing the site via the Golden Highway / Ringwood Road intersection: (b) must exit Ringwood Road by turning left on to the Golden Highway only as shown in Figure 4 in Appendix 4.	Closed
GRSF-03_NC-02	B5	**Access Route** All vehicles (excluding heavy vehicles requiring escort) associated with the development departing the site and needing to travel east along the Golden Highway must use the turnaround point at Barnett Street, as shown on Figure 4 in Appendix 4.	Closed
GRSF-03_NC-05 **GRSF-03_NC-06**	B19	**Variation to Construction Hours** The hours of construction activities specified in condition B17 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been and will be undertaken; (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the *Interim Construction Noise Guideline* (DECC, 2009), or latest version.	Closed

Table 3: DPHI Identified Non-Compliances

IEA#3 ID:	CoC No.	Compliance Requirement	Independent Audit Findings and Recommendations	Proposed Action Due Date
GRSF-03_NC-37	B16	**Biodiversity Management Plan** Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan	**DPHI identified non-compliance** As per record the breach issued on 22 January 2026 following a DPHI site inspection on 5 November, with the breach record stating that: "The Department has recorded a breach against Schedule 2, Condition B16 for failing to undertake weed control, as identified during the 5 November site inspection. Please ensure weed management is undertaken in accordance the BMP". The Auditor notes that at the time of the IEA #3 site inspection, weeds were being effectively managed, with evidence of herbicide use observed and evidence that a weed contractor had been engaged and had sprayed to majority of access roads and site boundaries. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	Closed
GRSF-03_NC-38	B21	**Dust** The Applicant must minimise the dust generated by the development.	As per Penalty Notice dated 6 March 2026, the DPHI site inspection on 5 November identified a breach with CoA B21 due to failure to appropriately control dust. The non-compliance has been recorded within IEA #3 due to the enforcement outcome occurring in the audit period and considering that the non-compliance was not previously self-reported. The Auditor notes that at the time of the IEA #3 site inspection, dust was generally being effectively managed, with the exception of a single point source location as identified in audit finding GRSF-03_NC-38. In respect to this DPHI identified non-compliance, the Auditor considers the matter as closed. **Recommendation** Nil	Closed

Table 4: Opportunities for Improvement (OFI)

IEA#3 ID:	CoC No.	Compliance Requirement	Independent Audit Opportunity for Improvement	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
GRSF-03_OFI-1	B33	**Storage and Handling of Dangerous Goods** The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency	During the site inspection the Auditor observed an instance where a diesel bulk above-ground storage tank (AST) utilised by a DTI subcontractor was leaking to the surrounding gravel hardstand. Upon further inspection there was approximately 3cm of liquid within the AST's secondary containment, indicating that the primary tank may be leaking. Additionally, in several instances surface staining was observed adjacent to diesel ASTs which were being used for refuelling within the DTI subcontractor area. Considering that the ASTs were located on a compacted pad, away from the Site boundary or any receiving ecosystems, the risk of material harm was considered by the Auditor to be low. **Recommendation** There is an opportunity for DTI to review subcontractor diesel management practices to ensure spills and leaks are appropriately managed to reduce environmental risk. The areas of local spills identified should be investigated and/or remediated via the removal of any impacted material, waste classification and offsite disposal, as required.	Following site inspection, the diesel storage tank identified by the Auditor was inspected and the source of the liquid within the secondary containment system was investigated. The affected area was cleaned and any visibly impacted material removed and managed appropriately. DTI also undertook a review of fuel storage and management practices within the subcontractor area. Requirements relating to fuel storage, routine inspection, maintenance of tanks and associated equipment, secondary containment, spill response and housekeeping have been reinforced with sub-contractors through site meetings and environmental inspections. Routine inspections of fuel storage and refuelling and hazardous substance areas will continue to be undertaken as part of the Project's environmental inspection program. Any spills, leaks or deficiencies identified during inspections will be addressed promptly, including remediation of impacted areas and implementation of corrective actions where required. DTI considers that the actions undertaken, together with ongoing inspection and management of fuel storage and refueling activities, will minimize the potential for environmental impacts associated with diesel handling and storage on site.	14 June 2026 Closed Ongoing monitoring and inspection.
GRSF-03_OFI-2	B29	**Operation Conditions** The Applicant must: (a) minimise any soil erosion and control sediment generation; (b) ensure that construction, upgrading or decommissioning of the development has appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with the relevant requirements in the *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004) manual and the *Managing Urban Stormwater: Soils and construction - Volume 2A* manual (Landcom,	Section 10.4 of the Enerven CEMP states that appropriate erosion and sedimentation controls should be installed and maintained in accordance with the Erosion and Sediment Control Plan developed in accordance with the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version. During the site inspection the Auditor observed that the Erosion and Sediment Control Plan (ESCP) for the Enerven site had been developed for the bulk earthworks phase and was not reflective of current site conditions. Several controls were not being maintained in accordance with the ESCP, however given the erosion risk had significantly decreased since completion	The ESCP was reviewed and updated to reflect current site activities and was subsequently endorsed by a Certified Professional in Erosion and Sediment Control (CPESC) on 11 June 2026.	11 June 2026 Closed

		2008), or their latest versions; (c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; (d) ensure the solar panels do not cause any increased water being diverted off the site or alter hydrology off site; (e) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; (f) ensure all works within waterfront land is undertaken in accordance with *Guidelines for Controlled Activities on Waterfront Land* (DPE, 2022), unless the Planning Secretary agrees otherwise; and (g) ensure the design of all creek crossings (including internal tracks and MV cables) is in accordance with the document *Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (NSW Fisheries 2003) and the *Policy and Guidelines for Fish Habitat Conservation and Management* (Update 2013).	of the bulk earthworks phase, absence of controls was not considered to be a critical risk. **Recommendation** Enerven / Transgrid should update the ESCP to reflect current site activities and remove any redundant erosion and sediment controls.		
GRSF-03_OFI-3	B30	**Soil and Water Management Plan** Prior to commencing construction, the Applicant must prepare a Soil and Water Management Plan for the development in consultation with DPE Water. This plan must: a) be prepared by suitably qualified and experienced persons; b) include a description of the measures that would be implemented to ensure that the objectives of condition B29 (a) – (g) above are achieved; c) include a program to monitor and report on the effectiveness of these measures; and d) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions e) The Applicant must implement the Soil and Water Management Plan	Section 10.4 of Enerven CEMP states that concrete washout facilities should be double-plastic lined. During the site inspection the Auditor observed Enerven undertaking concrete washout in dedicated trays, with concrete waste stockpiled on the adjacent ground. The concrete washout location was not developed in accordance with the Enerven CEMP. **Recommendation** Nil. Following the audit inspection Enerven undertook corrective actions including the construction of a dedicated concrete washout area on 28 May 2026, including a 0.3m high soil bund surrounding steel washout trays with double-lined black plastic and signage. Refer to Appendix D for photos.	No further action required.	28 May 2026 Closed

GRSF-03_OFI-4	B21	**Dust** The Applicant must minimise the dust generated by the development.	DTI currently implements a dust monitoring plan, comprising the use of dust deposition gauges (DDG) in four (4) locations on the Site boundaries. The DDG allow for retrospective compliance assessment of dust loads against EPA criteria, however there was no real-time monitoring of dust being undertaken. **Recommendation** DTI also utilises Site Hive monitors for real-time noise monitoring. There is an opportunity to reutilise the Site Hive monitors for both noise and air quality, allowing for real-time monitoring of dust levels during construction. The Trigger Action Response Plan (TARP), attached to the DAMP included trigger actions in response to atmospheric conditions. Should the project utilise site Hive for air quality monitoring, the TARP should be updated to include dust trigger levels based on real-time Site Hive data, whereby the project can respond to triggers immediately, with the aim of reducing offsite dust impacts.	The Project currently implements a comprehensive dust management framework comprising meteorological monitoring, dust deposition gauges, daily environmental inspections, weather forecasting and a Dust Action Management Plan, incorporating a Trigger Action Response Plan. DTI will investigate the feasibility and benefits of incorporating real-time particulate monitoring into the existing Site Hive platform. Any decision to implement real-time dust monitoring will consider technical suitability, monitoring objectives and consistency with the Project's approved management framework. Should real-time dust monitoring be adopted, the Dust Action Management Plan and associated TARP will be reviewed and updated as required.	31 August 2026.
GRSF-03_OFI-5	B34	**Operating Conditions** For the solar and battery storage components of the development, the Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	During the site inspection the Auditor observed several instances where combustible fuel loads of timber and cardboard from packaging were stored in large stockpiles, potentially presenting a fire risk. It is understood that waste removal is limited by traffic movement constraints, and the project has utilised waste compactors to reduce the volume of timber and cardboard waste. However, waste appears to be accumulating on site awaiting disposal. **Recommendation** The project should seek to reduce volumes of stockpiled timber and cardboard before the bush fire risk season commences. Considering that heavy vehicle daily movement limits have recently been increased, there should be an increased ability to do so.	The accumulation of timber and cardboard waste has been influenced by site waste generation rates and restrictions associated with approved traffic movements. The Project has implemented waste compaction measures to reduce storage volumes and improve transport efficiency. Following the increase in approved heavy vehicle movements, DTI is working with contractors and waste service providers to progressively reduce accumulated timber and cardboard stockpiles. Waste removal activities will continue to be prioritised to ensure combustible material volumes are minimised ahead of the 2026/27 bushfire season.	30 September 2026.