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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 for staging of the development under Development Consent condition C3

Dear Iwan,

1. Introduction

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

The approved development includes:

- 585 MWp solar farm and ancillary infrastructure (Solar Farm),
- 450 MW / 900 MWh Centralised BESS (Centralised BESS), and
- 480 MW / 1,160 MWh Decentralised (DC) BESS (DC-BESS).

The Project is proposed to be delivered in three main stages:

- construction,
- operation, and
- decommissioning.

Management plans may require preparation, review and updating prior to the commencement of each stage to ensure they remain consistent with the current design, activities, risks and requirements.

In addition, the BESS components of the Project are proposed to be staged and delivered progressively:

- 192 MW / 562 MWh DC-BESS (Phase 1 DC-BESS),

- 450 MW / 900 MWh Centralised BESS (Centralised BESS), and
- 288 MW / 598 MWh DC-BESS (Phase 2 DC-BESS).

Note that the BESS storage capacities referenced herein are as currently approved, however a modification application is planned to request an amendment to Conditions A6 and A7 to increase battery storage capacity.

As a result, certain management plans will require additional preparation, review and updating at different points throughout the construction and operation stages of the Project to reflect the design, operational and risk information applicable to each BESS component.

2. Request for Staged Management Plans

Lightsource bp is seeking Planning Secretary approval under Condition C3(a) of the Consent to prepare, review and update relevant management plans on a staged basis.

The proposed staging framework incorporates:

- Review and updating of management plans, where required, prior to the commencement of each main stage (construction, operation and decommissioning), and
- Additional review and updating of specific management plans to align with the progressive delivery of the BESS components of the development.

A staged approach will ensure that management plans and supporting project documentation reflect the most current information relevant to each Project stage and BESS component. This approach will support efficient project delivery while maintaining compliance with the requirements of the Consent.

In accordance with Condition C3(a) of the Consent, the development may be staged, and any strategy, plan or program required by the Consent may be prepared and submitted on a staged basis. This request principally relates to the staged preparation and updating of the Fire Safety Strategy (FSS) and Emergency Plan (EP) to align with the progressive delivery of the BESS components. Other management plans may also be prepared, reviewed and updated prior to the commencement of each project stage.

3. Indicative Staging

The Project is proposed to be delivered in the stages outlined in **Table 1**. Further detail on the proposed development stages, development components and the relationship between stages is provided in **Table 2**.

Table 1: Summary of stages for the Goulburn River solar farm development

Stage	Project Phase	Development Component
Stage 1	Construction	a) Construction of the Solar Farm b) Construction of the Phase 1 DC-BESS c) Construction of the Centralised BESS d) Construction of the Phase 2 DC-BESS

Stage	Project Phase	Development Component
Stage 2	Operations	a) Operation of the Solar Farm b) Operation of the Phase 1 DC-BESS c) Operation of the Centralised BESS d) Operation of the Phase 2 DC-BESS
Stage 3	Decommissioning	a) Decommissioning and rehabilitation of the Solar Farm b) Decommissioning and rehabilitation of the Phase 1 DC-BESS c) Decommissioning and rehabilitation of the Centralised BESS d) Decommissioning and rehabilitation of the Phase 2 DC-BESS

4. Staged Management Plan Framework

The proposed staging approach comprises two levels of management plan review and update. Firstly, management plans will be prepared, reviewed and updated, where required, prior to the commencement of each main stage (construction, operation and decommissioning) to ensure they remain consistent with the activities, risks and requirements applicable to that stage.

Secondly, given the progressive delivery of the BESS components, relevant management plans will be prepared, reviewed and updated, where required, throughout the life of the Project to align with the commencement of specific BESS components and broader Project stages. The two management plans this is relevant to include the Fire Safety Study (FSS) and Emergency Plan (EP), which will be updated as set out below:

- A FSS will be prepared in accordance with Condition B31 prior to commencement of construction of each BESS component, including the Phase 1 DC-BESS, Centralised BESS and Phase 2 DC-BESS. The FSS will reflect the final design, operational arrangements and risk profile of the relevant BESS component. The FSS will either be progressively updated to account for each stage of the BESS or a separate FSS will be prepared for each of the Phase 1 DC-BESS, Centralised BESS and Phase 2 DC-BESS.
- The EP, prepared in accordance with Condition B35, will be reviewed following approval of each FSS, and where necessary, updated to incorporate the relevant fire safety findings, emergency response measures and operational controls associated with that BESS component. The EP will also be reviewed and updated, where required, prior to the commencement of the operational and decommissioning phases of the Project.

This staged approach will ensure that management measures, emergency response procedures, risk assessments, layout plans and operational controls are based on the most current design and operational information available at the time. Management plans will continue to be prepared, reviewed and updated in accordance with the relevant conditions of the Consent.

Layout plans will be published on the Project website and submitted through the NSW major projects portal in accordance with Condition C8. Design refinements may occur throughout the delivery of the Project and may not necessarily coincide with the commencement of a project stage. Where design refinements occur, updated layout plans will be provided and will supersede previous versions. Further details on management plan updates are provided in **Table 3**.

Table 2: Proposed staging of the development, including relevant timeframes and relationships between stages

Stage	Development Component	Indictive Timeframe	Description	Relationship Between Stages
Stage 1 – Construction	a) Construction of Solar Farm	Apr 2025 – Apr 2027	Construction of the solar farm and related ancillary infrastructure, including: - Site preparation works. - Upgrades to local roads and culvert upgrade works. - Construction of the temporary workers accommodation facility. - Construction of the site operation and maintenance facility. - Construction and commissioning of the 585 MWp solar farm and associated substation and switchyard.	Construction of the solar farm (Stage 1a) and Phase 1 DC-BESS (Stage 1b) will overlap. There may additionally be some construction overlap across all development components within Stage 1.
	b) Construction of Phase 1 DC-BESS	Sep 2025 – Apr 2027	Construction and commissioning of Phase 1 DC-BESS. In detailed design at time of this request.	
	c) Construction of Centralised BESS	Early 2027 – late 2028	Construction and commissioning of Centralised BESS.	
	d) Construction of Phase 2 DC-BESS	Mid 2028 – late 2029	Construction and commissioning of Phase 2 DC-BESS.	
Stage 2 - Operations	a) Operation of the Solar Farm	May 2027 onwards	Operation and maintenance of the solar farm and ancillary infrastructure for an operational life of approximately 40 years. Note that the project may involve infrastructure upgrades that may extend the operational life.	Commences after commissioning. Overlap will occur between Stages 2(a), 2(b), 2(c), and 2(d), and may also occur with Stages 1 and 3. Upgrades may occur through the operational life of the Development Components.
	b) Operation of the Phase 1 DC-BESS	May 2027 onwards	Operation and maintenance of the Phase 1 DC-BESS.	
	c) Operation of the Centralised BESS	Late 2028 onwards	Operation and maintenance of the Centralised BESS.	
	d) Operation of the Phase 2 DC-BESS	Late 2029 onwards	Operation and maintenance of the Phase 2 DC-BESS.	

Stage	Development Component	Indictive Timeframe	Description	Relationship Between Stages
Stage 3 - Decommissioning	Decommissioning and rehabilitation of the development	From approx. 2066 onwards	Decommissioning of the solar farm and BESS, including removal and appropriate disposal of infrastructure and rehabilitation of the land.	Will occur at the end of operational life. Development components may be decommissioned progressively, with full site rehabilitation occurring within 18 months of cessation of all operations.

5. Staged Management Plan Framework

The proposed staging approach comprises two levels of management plan review and update. Firstly, management plans will be prepared, reviewed and updated, where required, prior to the commencement of each main stage (construction, operation and decommissioning) to ensure they remain consistent with the activities, risks and requirements applicable to that stage.

Secondly, given the progressive delivery of the BESS components, relevant management plans will be prepared, reviewed and updated, where required, throughout the life of the Project to align with the commencement of specific BESS components and broader Project stages. The two management plans this is relevant to include the Fire Safety Study (FSS) and Emergency Plan (EP), which will be updated as set out below:

- A FSS will be prepared in accordance with Condition B31 prior to commencement of construction of each BESS component, including the Phase 1 DC-BESS, Centralised BESS and Phase 2 DC-BESS. The FSS will reflect the final design, operational arrangements and risk profile of the relevant BESS component. The FSS will either be progressively updated to account for each stage of the BESS or a separate FSS will be prepared for each of the Phase 1 DC-BESS, Centralised BESS and Phase 2 DC-BESS.
- The EP, prepared in accordance with Condition B35, will be reviewed following approval of each FSS, and where necessary, updated to incorporate the relevant fire safety findings, emergency response measures and operational controls associated with that BESS component. The EP will also be reviewed and updated, where required, prior to the commencement of the operational and decommissioning phases of the Project.

This staged approach will ensure that management measures, emergency response procedures, risk assessments, layout plans and operational controls are based on the most current design and operational information available at the time. Management plans will continue to be prepared, reviewed and updated in accordance with the relevant conditions of the Consent.

Layout plans will be published on the Project website and submitted through the NSW major projects portal in accordance with Condition C8. Design refinements may occur throughout the delivery of the Project and may not necessarily coincide with the commencement of a project stage. Where design refinements occur, updated layout plans will be provided and will supersede previous versions. Further details on management plan updates are provided in **Table 3**.

Table 3: Management plan staging matrix¹

Management Plan	Ref.	Stage 1 – Construction					Stage 2 – Operations ²				Stage 3 ⁴ – Decom	Staging Approach / Trigger for update
		Road Upgrades	Solar Farm	DC-BESS Phase 1	AC- BESS	DC-BESS Phase 2	Solar Farm	DC-BESS Phase 1	AC- BESS	DC-BESS Phase 2		
Environmental Management Strategy (EMS)	C1	Prepared prior to construction	Implement	Implement	Implement	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Project-wide document. Prepared prior to construction and updated as required throughout project life.
Traffic Management Plan (TMP)	B10	Prepare prior to construction	Update prior to high risk OSOM deliveries	Implement	Update prior to high risk OSOM deliveries	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Prepared prior to road upgrades. Updated where traffic arrangements or escorted vehicle movements change.
Biodiversity Management Plan (BMP)	B16	Prepare prior to construction	Implement	Implement	Implement	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Prepared prior to any biodiversity impacts. Remains in force throughout construction, operation and decommissioning.
Heritage Management Plan (HMP)	B26		Prepare prior to construction	Implement	Implement	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Prepared prior to construction. Remains in force throughout construction, operation and decommissioning.
Soil & Water Management Plan (SWMP)	B30		Prepare prior to construction	Implement	Implement	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Prepared prior to construction. Water sourcing strategy updated if water supply arrangements change.
Fire Safety Study (FSS)	B31			Prepare prior to construction of DC-BESS 1	Prepare prior to construction of AC BESS	Prepare prior to construction of DC-BESS 2						Separate (or updated) FSS to be prepared and submitted prior to commencement of construction of each BESS component, reflecting final design and risk profile applicable to that stage.
Emergency Plan (EP)	B35		Prepare prior to construction	Update with FSS findings prior to commissioning and operations			Review/ update if required	Implement	Implement	Implement	Review/ update if required	Initial EP prepared prior to construction. Will be updated with the results of the FSS at a time prior to

¹ Note that strategies, plans and programs will also be revised in accordance with Condition C2 (prior to carrying out upgrading or decommissioning, and, if necessary, following submission of incident reports, audit reports and any modifications).

² Relevant strategies, plans and programs will be reviewed and if necessary, updated prior to commencement of operations and/or decommissioning stages.

Management Plan	Ref.	Stage 1 – Construction					Stage 2 – Operations ²				Stage 3 ⁴ – Decom	Staging Approach / Trigger for update
		Road Upgrades	Solar Farm	DC-BESS Phase 1	AC- BESS	DC-BESS Phase 2	Solar Farm	DC-BESS Phase 1	AC- BESS	DC-BESS Phase 2		
												commissioning and operation (as advised by FRNSW during consultation)
Accommodation Camp Management Plan (ACMP)	B39		Prepare prior to TWA construction	Implement	Implement	Implement						Prepared prior to accommodation camp construction. Anticipated that the TWA will be removed following construction.
Accommodation Employment Strategy (AES)	B40		Prepare prior to construction	Implement	Implement	Implement	Review/ update if required	Implement	Implement	Implement	Review/ update if required	Prepared prior to construction.

Lightsource bp respectfully requests the Planning Secretary's approval under Condition C3(a) of the Consent to prepare, review and update management plans on a staged basis. This includes updates associated with the broader construction, operation and decommissioning phases of the Project, as well as additional updates required to support the progressive delivery of the BESS components.

Please do not hesitate to reach out if you would like to discuss any of the items presented in this request.

Sincerely,



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Cc: Glenn Tilley (Senior Project Manager), Michelle Housego (Senior HSE Advisor)