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Department of Planning, Housing and Infrastructure

Goulburn River Solar Farm (SSD-33964533): Request for Planning Secretary approval for extended construction hours under Development Consent condition B17 – version 3

Dear Iwan,

1. Summary of request

Lightsource bp are requesting the Planning Secretary's written approval to vary the permitted construction hours under Condition B17, in accordance with Condition B19 of Development Consent SSD-33964533. We are requesting permission for construction on the Goulburn River Solar Farm Project to occur between 7am and 6pm Monday to Sunday, inclusive of public holidays.

This request for Planning Secretary approval is being reissued to include a summary of the community consultation which has been undertaken on the topic of out of hours work.

The requested extended hours will allow the project to:

- Implement staggered shift arrangements (rosters of [i.e.,] 10 days on, 4 days off)
- Support adequate rest and recovery time for the predominantly drive-in, drive-out (DIDO) workforce, who will largely be staying in the onsite temporary workers accommodation facility (TWA)
- Maintain productivity across weekends and public holidays
- Reduce time pressure on weekday construction schedules; and
- Better manage time-sensitive and weather-dependant work fronts.

This request is for the duration of construction, which commenced from 29th May 2025 and is anticipated to conclude in early 2027. The Project commits to a six (6) monthly review of out of hours works.

Heavy vehicle movements on the public road network will be limited to standard hours (weekdays 7am to 6pm and Saturdays 8am to 1pm only) (in line with the Interim Construction Noise Guideline [INCG]). Construction for the road repairs and upgrades will also be limited to the ICNG standard hours, as these works occur in closer proximity to sensitive receivers than solar farm works do.

Noise from the solar farm site will at all times remain within the noise management levels required by the Development Consent (condition B20).

This request is supported by:

- A justification aligned with the workforce, spatial, and schedule-specific needs of the Project
- Evidence that all feasible and reasonable noise mitigation measures are in place
- A review of relevant environmental assessments confirming noise compliance across multiple scenarios
- A commitment to additional mitigation actions during out-of-hours work, supported by real time monitoring; and
- A record of ongoing consultation with stakeholders and a commitment to targeted notification.

2. Background

The Goulburn River Solar Farm (the Project) received Development Consent (SSD-3396533) under the *Environmental Planning and Assessment Act 1979* on 22 August 2024 for the construction, operation and decommissioning of a 550-megawatt solar farm. The Project includes the installation of up to one million photovoltaic solar panels, a Battery Energy Storage System (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.

As part of the Project, a TWA facility is being established on-site to accommodate the drive-in drive-out (DIDO) component of the workforce. The TWA is essential to minimise traffic impacts on local roads, alleviate pressure on regional accommodation and maintain workforce efficiency throughout construction.

Key milestones:

- Road upgrades commenced on the 7th February 2025 and are currently underway.
- Limited construction commenced on 14th April 2025, restricted to critical activities including road upgrades and civil works associated with internal access roads, the TWA, and substation bench preparation.
- Full construction commenced on 29th May 2025, following practical completion of the Golden Highway/Ringwood Road intersection (in accordance with condition B7).
- The TWA is expected to start housing workers from the 20th September 2025. Additional housing units will then continue to be installed, with completion of the TWA planned for the end of November 2025.

Condition B17 of the Development Consent currently restricts construction activities to the following hours:

- 7am to 6pm Monday to Friday
- 8am to 1pm Saturday; and
- No construction activities on Sundays or NSW public holidays

Out of hours works (OOHW) are only permitted under Condition B18 in the following circumstances:

- (a) Commissioning activities that are inaudible at non-associated residences;
- (b) Material deliveries required by the NSW Police Force or other authorities for safety reasons; or
- (c) Emergency works required to prevent loss of life, property damage, or environmental harm.

On 6 September 2024, Lightsource bp submitted a letter to the Department of Planning, Housing and Infrastructure (the Department) outlining potential amendments to the Development Consent, including a request to extend construction hours. The Department responded on 10 September 2024, confirming that construction hours must comply with Condition B17 unless a formal variation is sought under Condition B19, which states:

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.*

3. Request

Lightsource bp respectfully requests the Planning Secretary's written approval under Condition B19 of the Development Consent to vary the construction hours permitted under Condition B17.

Specifically, we request approval for the following extended **construction** hours:

- (a) 7am to 6pm Monday to Friday (unchanged), and**
- (b) 7am to 6pm Saturday, Sunday and NSW Public Holidays**

This variation is sought with consideration of the mental health and wellbeing of the predominantly DIDO workforce staying in the onsite TWA. The variation will allow for improved construction scheduling and more effective use of DIDO workers (i.e., a 10/4 roster or similar), as well as to support timely achievement of construction milestones.

4. Basis of Request – in accordance with B19(a)

This request is for the duration of full construction, commencing from 29th May 2025 and anticipated to conclude in early 2027.

The success of OOHW will be reviewed on a six-monthly basis. The review will include any complaints received from the community about OOHW along with the actions taken in response, as well as additional consultation with Upper Hunter Shire Council. The review will be provided to the Department, along with any recommendations for additional mitigations, as part of a renewed request for extended out of hours works.

Whilst the intent is to continue OOHW throughout construction, the review process will provide opportunity to reassess and adjust the approach if necessary. Notwithstanding the review period, the Project will be responsive to noise monitoring results and any complaints from the community.

Additionally, Lightsource bp will consult with Upper Hunter Shire Council on a three-monthly (minimum) basis. The outcomes of this consultation may result in additional controls being implemented and will contribute to the six-monthly review.

5. Details of the Justification for and Nature of Activities - in accordance with B19(b)

Justification

Social impact assessment during the Project's planning phase identified that the local region is characterised by low unemployment. As a result, the Project anticipates that approximately 90% of the workforce will need to travel from out of the region. It is an approximately 3 hr drive to Newcastle from the Project site, or 4 hr to Sydney. These distances mean that workers cannot return home at the end of a shift and will therefore be rostered to stay at work for a set number of days, before driving (or flying) home for a set number of days.

The Project workforce will be largely housed in an on-site TWA facility. The preferred DIDO roster would be 10 days on followed by four (4) days off. Depending on the employment terms of specialist subcontractors, DIDO rosters could alternatively be seven (7) days on, seven days off, or even 14 on, 14 off.

A DIDO roster is already common in the resource sector across Australia, as well as on renewable energy construction projects in states such as Queensland. Renewable project sites are increasingly being established in more remote areas with relatively low population numbers. For those projects in or near to renewable energy zones, there is also competition for the limited locally-based workforce. As a result, the workforce solution to constructing renewable energy projects will inevitably include FIFO/DIDO workers. Whilst the Goulburn River solar farm's Accommodation and Employment Strategy commits the project to strategies aiming to reduce any real or perceived negative impacts on the local community, it is inescapable that a large portion of the workforce will need to be DIDO.

The inclusion of the on-site TWA for the Project came in response to feedback from both the Department and the local councils, based on regional accommodation limitations and road access constraints. Under the current construction hours (Mon to Fri, half day Saturday), the DIDO workforce would be inactive during weekends and public holidays, with insufficient time available to them to travel to their homes for sufficient rest and recharge. The current working hours are therefore unfavourable to workers and can be reasonably expected to discourage experienced and engaged remote workers from joining the Project workforce.

The Project EIS contemplated construction hours of 6am-6pm Monday to Saturday, which was used as the basis of construction timeframe estimates. The reduced hours conditioned by the development consent will therefore delay Project delivery. Allowing for the out of hours works as proposed in this request could feasibly deliver the project 60 days earlier than otherwise.

In summary, the current working hours have significant implications for resource utilisation, project delivery and adherence to critical milestones.

Spatial Context and Acoustic Setting

The Project site is located in a remote area, surrounded by Goulburn River National Park, with sparse rural residential development nearby. The nearest non-associated sensitive receiver (R1) is located approximately 1.7km from the site boundary and over 2.5km from the nearest active work zone – refer to Figure 1 below.

Additionally, the surrounding topography and dense vegetation cover provide natural acoustic attenuation, further minimising potential noise impacts.

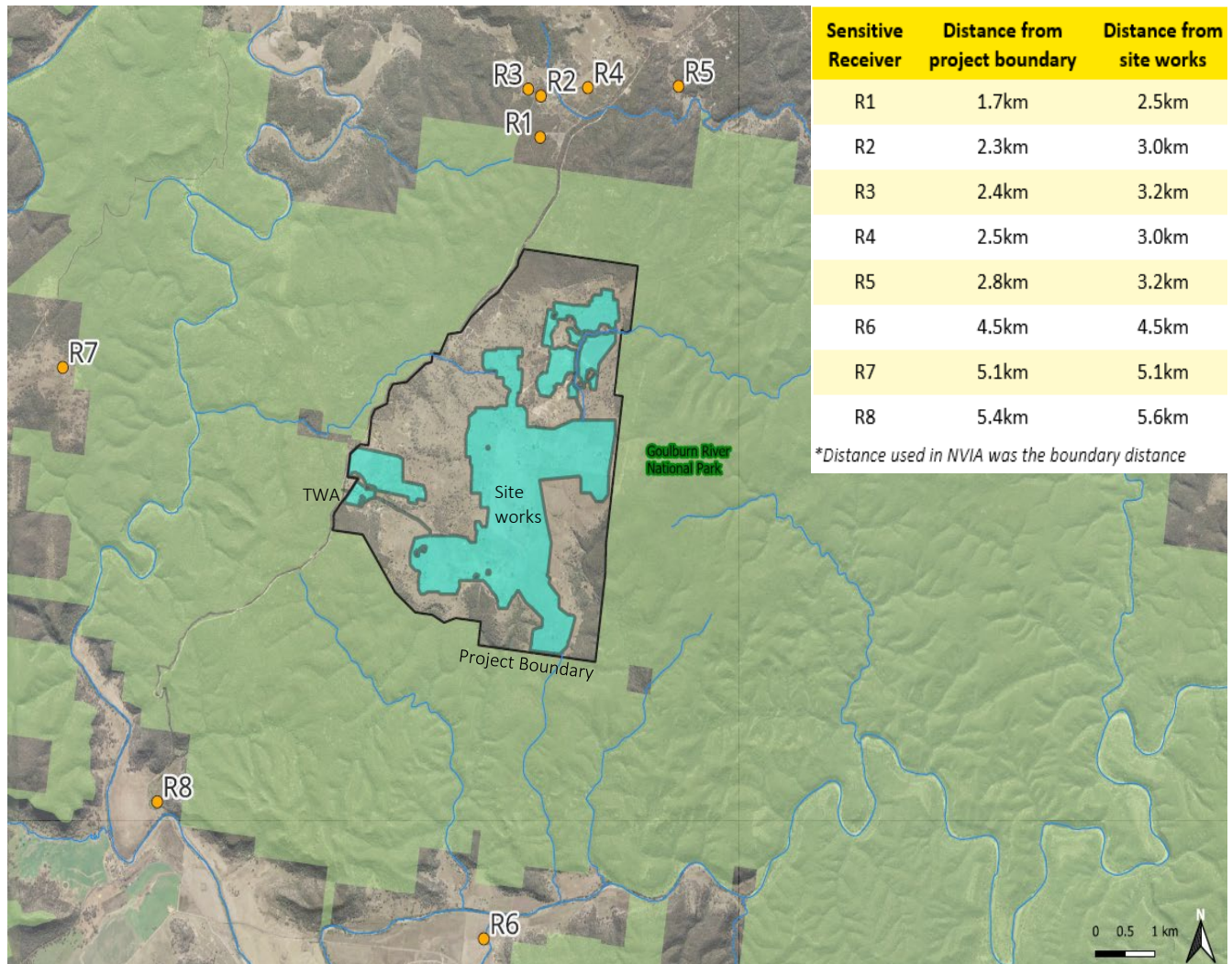


Figure 1 Map of nearby sensitive receivers (R1 to R8) and corresponding distance from the site boundary and works.

Details of Construction Activities

Our request for extended construction hours covers all construction activities, with the exception of the following activities:

- Road upgrades (inclusive of culvert upgrades)
- High noise emitting plant (i.e., tub grinder, chainsaw, rock hammers, jackhammers and concrete saws, piling), unless inaudibility can be confirmed at the Project area boundary.

Traffic associated with extended construction hours will remain compliant with the Project traffic management plan, including (but not limited to) compliance with assessed AM/PM peak hours, left in/left out arrangement at the Golden Highway intersection.

The Project will not run heavy vehicles on the public road network during the extended hours (Saturday afternoon and Sunday). Light vehicle use will be limited, with shuttle buses used preferentially for any workers staying off-site or for those staying in the temporary workers accommodation camp who are visiting town.

6. Consultation with Sensitive Receivers and Relevant Agencies - in accordance with B19(c)

As part of this variation request, Lightsource bp have undertaken targeted consultation with Upper Hunter Shire Council and Transport for NSW. Both agencies have indicated their support for out of hours works, with their feedback incorporated into this request.

As noted previously, the Project has identified eight (8) potentially affected sensitive receivers who are located between 2.5km and 5.6km from the site works (Figure 1). Emails were sent to five of these receivers (R1, R5, R6, R7, R8) on 1st July, with a letter box drop to the remaining three (R2, R3, R4) on 2nd July. No objections to the proposed OOHW were received from these eight potentially affected sensitive receivers.

Additionally, three key interested parties who have previously expressed interest in regular updates on the Project were contacted via email (17th July/22nd July), with phone call follow up. These three parties raised objections to the proposed OOHW on the basis of their concerns about increased traffic on the local public roads. Their concerns related to the state of the local roads at the time of consultation, including perceived delays in road upgrade works and a delay in reactive road maintenance.

In response, the Project's request to the Planning Secretary for OOHW was put on hold until an action plan could be developed with the EPC contractor, DT Infrastructure (DTI), and implemented to address the condition of Ringwood and Wollara Roads. At the time of resubmission of this request, the following actions relating to road condition have been or are being implemented:

- Section 138 permit issued under the *Roads Act 1993* by Upper Hunter Shire Council, enabling DTI to repair any area of degradation caused by the Project along Ringwood and Wollara Roads.
- Daily monitoring along Ringwood and Wollara Roads of emerging potholes and other areas of road damage incorporating dashcams and daily visual inspections, and prompt repair.
- Repair to the pavement of an approximately 1.2km section of Ringwood Road.
- Resolution of works to finalise private driveway tie-ins with the upgraded section of Wollara Road.

Road upgrade works have also progressed, with the receipt of the final s138 permit issued under the *Roads Act 1993* by Upper Hunter Shire Council for Bow Creek, enabling works on both Killoe and Bow Creek culverts to commence. The efforts to improve the road condition have been acknowledged by community members.

Concurrently, additional emphasis has been placed on community consultation. Newsletters, previously quarterly, will now be issued monthly and will include an invitation to newly established "Community Coffee and Cake Connect" days, which commenced on 27th August and will be scheduled approximately one week after each monthly newsletter is sent out.

The message has also been reiterated to the community that the proposed additional hours are not anticipated to have any additional impact on nearby properties. All activities undertaken during extended hours will stay within the currently approved noise limits. Traffic impacts will be addressed by:

- Limiting road upgrade works to the current standard hours (weekdays 7am to 6pm and Saturdays 8am to 1pm only)
- Limiting heavy vehicle movements on public roads to the current standard hours (weekdays 7am to 6pm and Saturdays 8am to 1pm only), with the exception of very limited movements associated with water trucks and over size over mass (OSOM) movements, which could occur outside of standard hours
- Minimising light vehicle movements on public roads by prioritising the use of shuttle buses and carpooling.

If approved, we would also consult with the broader community through the distribution of a 'Keeping You Informed' slip to residents along Ringwood and Wollara Roads, prior to commencing the OOHW. Additionally, we would include details of the change in the next monthly Project newsletter and we would also welcome further discussion at the monthly "Community Coffee and Cake Connect" days.

Lightsource bp is committed to continued transparency and open communication with stakeholders and community members throughout the construction period. In accordance with the Project's construction phase Stakeholder and Communication Plan, an established Construction Response Line (1300 429 152) and email address (goulburnriversolar@dtiinfrastructure.com.au) have been communicated to the community. Complaints are acknowledged within 2-hours (emails) and investigated, with an update or final response aimed to be provided to the complainant within 24 hours. Regular project updates are provided via 'keeping you informed' slips, newsletters, and direct communication channels. All complaints and inquiries are tracked.

Evidence of consultation has been provided separately to DPHI through the Major Projects Portal.

7. Noise Mitigation Measures - in accordance with B19(d)

In accordance with Condition B19(c), Lightsource bp confirms that all reasonable and feasible noise mitigation measures will be put in place to minimise the impact of construction activities on sensitive receivers. These measures are incorporated into the Construction Environmental Management Plan (CEMP), the Construction Noise and Vibration Management Plan (CNVMP), and supporting technical assessments.

Table 1 outlines the mitigation measures currently in place or committed to during standard and extended construction hours.

Table 1 Summary of Noise Mitigation Measures

Mitigation Measure	Description
Community engagement and complaints line	Ongoing stakeholder engagement, pre-notification of high impact works, and complaints response procedures
Notification	All potentially affected sensitive receivers would be notified at least 7 days prior to commencement of any works that may have an adverse noise or vibration impact (across all hours of working/not limited to OOHV).
Notification	All potentially affected sensitive receivers will be sent a letter upon approval of this request, informing them of the change to construction hours and detailing the process for them to get in touch with the Project if they have any concerns or questions.
Heavy vehicle movement restrictions	With the exception of water trucks, heavy vehicle movements to and from site will be limited to 7am to 6pm Monday to Friday, and 8am to 1pm Saturdays. <i>Note, over size over mass vehicle movements (anticipated to be two only during construction) may occur outside of standard hours.</i>
Light vehicle movement restrictions	Light vehicle use will be limited, with shuttle buses used preferentially for any workers staying off-site or for those staying in the temporary workers accommodation camp who are visiting town.
Road upgrades	Road upgrades, including upgrades to the culverts, will not occur during out of hours works.
Construction induction and training	All staff, contractors, and subcontractors will receive an environmental induction which must include, at minimum, all applicable mitigation measures, hours of work, any limitations on high noise-generating activities, location of sensitive receivers, and relevant approval conditions and incident procedures.
Construction Noise and Vibration Management Plan	A project wide CNVMP will be implemented as part of the CEMP, guiding how noise and vibration impacts are monitored, controlled, and managed
Staging of activities	Construction will be sequenced to avoid multiple high-noise activities occurring simultaneously near sensitive receivers
Location of fixed plant	Noise emitting plant will be directed away from sensitive receivers and to be throttled down or shut down when not in use.
Use of quieter equipment	If an appropriate response to complaints, non-tonal reversing beepers could be fitted and used on construction vehicles and mobile plant used regularly on site and for any out of hours work. Low-noise machinery and equipment will be utilised, where possible.
Time restrictions	High-noise emitting plant (e.g., for rock-breaking, piling) will be limited to standard hours, unless inaudibility can be confirmed at the Project area boundary.
Noise monitoring	Real-time noise monitoring will be undertaken to verify compliance at the Project Area boundary, and if necessary (in response to complaint[s]), at the nearest sensitive receiver
Management plans	The traffic management plan and environmental management strategy will be reviewed and updated to account for the extension in construction hours.

These mitigation measures demonstrate proactive planning and implementation to ensure that any potential noise impacts associated with extended construction hours is minimised and managed in accordance with Condition B19(d).

8. Noise Impact Assessment - in accordance with B19(e)

Condition B19(e) requires that any request to vary construction hours must be accompanied by a noise impact assessment consistent with the requirements of the *Interim Construction Noise Guideline* (ICNG, DECC 2009). The technical assessments prepared as part of the Project's EIS provide robust and conservative modelling for a range of construction scenarios at different times of day.

Three noise assessments have been undertaken to date, summarised in Table 2.

Table 2 Summary of Relevant Noise Impact Assessments Supporting Extended Construction Hours

Assessment	Scope	Hours Used in Assessment	Key Findings	Relevance to request
Amendment Report 2 (TWA NVIA Addendum)	Construction and 24/7 operation of the TWA	24/7 Operation	Predicted noise levels at all sensitive receivers <20dB(A); well below all noise management levels (NML)	Confirms 24/7 activity (including construction) is acoustically acceptable
EIS – Appendix 14 (original NIVA)	Full construction of the solar farm	Early morning (6am – 7am); and Saturday afternoon (1pm – 5pm)	No highly affected receivers; marginal NML exceedances (<5dB(A)) during certain activities ¹ , manageable with standard mitigation measures	Supports weekend work, including Sundays, based on acoustic equivalence with Saturday afternoons
Amendment Report 1 (Roads NVIA)	Road upgrades along Ringwood Rd and Wollara Road	Standard construction hours	Minor exceedances: activities remain below the 75 dB(A) high noise threshold, manageable with standard mitigation measures	Confirms construction activities can proceed under CNVMP controls without unreasonable noise impacts

Based on ICNG thresholds:

- **Noise Affected Level:** rating background level (RBL) + 10 dB(A) during standard hours; RBL + 5 dB(A) for OOHW
- **Highly Noise Affected:** 75 dB(A) $LA_{eq(15min)}$
- **Passive Recreation (National Park):** 60 dB(A), only applies when in use.

The adopted RBLs for the area, as confirmed in the EIS assessments, are:

- Day (7am – 6pm): 35 dB(A)
- Evening (6pm – 10pm): 30 dB(A)
- Night (10pm – 7am): 30 dB(A)

¹ The assessment found that construction noise levels associated with the solar farm are predicted to comply with the established noise management levels. For the road upgrades, unmitigated construction noise levels were predicted to exceed the established NMLs at some receivers. As a result, road upgrades are excluded from the request for out of hours work.

Across all three assessments:

- No non-associated sensitive receivers are predicted to be highly noise affected
- Most receivers are predicted to experience noise levels below the noise affected threshold
- Extended work periods (including Sundays and evenings) are feasible and consistent with the hours assessed by the EIS.

Works during extended hours will be limited to low-noise or non-audible (at the nearest sensitive receiver) activities and will only proceed where compliance noise monitoring confirms a RBL + 5dB. This approach aligns with the ICNG principles for OOHW management and demonstrates that the proposed variation can occur without adverse acoustic impacts.

The existing noise impact assessments, together with the proposed controls and monitoring, provide a sound evidentiary basis for compliance with Condition B19(e).

9. In Conclusion

In accordance with Condition B19 of the Development Consent, Lightsource bp requests the Planning Secretary's written approval to vary the permitted construction hours under Condition B17. The variation will:

- Maximise the utility of the DDO workforce accommodated on-site
- Improve construction sequencing and reduce inefficiencies
- Maintain the Project's critical path and scheduled commissioning date; and
- Deliver these outcomes, whilst avoiding unreasonable impacts to nearby sensitive receivers.

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),
Diana Mitchell (Head of Planning Australia/New Zealand)