

12 August 2025

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 Audit Findings (18 June 2025)**

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 first construction Independent Environmental Audit.

This response should be read in conjunction with the Independent Audit Report (file name SSD33964533_IEA_Audit_Report_June2025_1).

During the period of time covered by the audit, Lightsource bp self-reported a non-compliance against Condition B17 to DPHI, which also constituted a non-compliance against Condition A3. Please refer to table Appendix 1 for the Independent Auditor's recommendations in relation to this non-compliance.

No Opportunities for Improvement were raised during the audit.

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 get in touch if you require any additional information.

Kind regards,

Michelle Housego
Senior HSE Advisor



Table 1: Self Reported Non-Compliance

ID:	Condition of Consent	Specific Requirement	Independent Audit Findings and Recommendations	Actions taken to rectify
GRSF-01_NC-01:	A3	<p>The development may only be carried out:</p> <ul style="list-style-type: none"> (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. 	<p>A self-reported non-compliance was notified during the audit period due to construction activities occurring outside of the approved construction hours.</p> <p>Construction activities occurred outside the approved construction hours on Sunday, 25 May 2025. The final demobilisation of the 5 Mile Rest Stop worksite was scheduled for 26 May 2025; however, due to forecast rainfall and the associated risk of sediment runoff, the contractor removed the material stockpile on Sunday, 25 May 2025, without obtaining prior approval. Three truck & dogs from the 5 mile rest area (Golden Hwy) moved VENM to the council borrow pit. Each truck undertook three trips each.</p>	<p>Approval from DPHI A request to the Planning Secretary to vary construction hours (Condition B17) was submitted to DPHI via the Major Projects Portal on 1 July 2025.</p> <p>At the time of writing, this request has been withdrawn to enable additional community consultation. Lightsource bp will resubmit the request to vary B17 with the inclusion of feedback from targeted community consultation and with additional mitigations to address feedback.</p>
	B17	<p>Unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:</p> <ul style="list-style-type: none"> (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and <p>at no time on Sundays and NSW public holidays.</p>	<p>The non-compliance was notified to DPHI on 28 May 2025 and follow up correspondence sent to DPHI on 10 June 2025 with updated information. On 13/06/2025, DPHI requested further information from the project, due by 23/06/2025. A response to DPHI was still being drafted at the time of the audit.</p>	<p>Non-compliance notification Lightsource bp response to DPHI RFI (issued on 13 June 2025) was submitted via Major Project Portal on 23 June 2025.</p> <p>Currently under DPHI investigation.</p>

ID:	Condition of Consent	Specific Requirement	Independent Audit Findings and Recommendations	Actions taken to rectify
			<p>A non-compliance is therefore triggered against condition A3(a) and condition B17(c).</p> <p>Auditor Recommendation: Approval from the DPHI be obtained prior to undertaking any works outside of standard construction hours.</p>	