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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 to extend completion of road upgrades under Development Consent Condition B7 (revised request)

Dear Iwan,

Following the Planning Secretary's approval in October 2024 to vary the timing of road upgrades required under Condition B7 (SSD-33964533-PA-1), Lightsource bp was permitted to complete the Ringwood and Wollara Road upgrades within six months of construction commencing.

For the purpose of compliance, Lightsource bp understands the date for commencement of construction to be 28 May 2025, when formal notification was provided to the Department in accordance with condition C7 following completion of the Golden Highway/Ringwood Road intersection. Based on that notification, the current deadline for completing the Wollara and Ringwood Road upgrade scope would be 28 November 2025. At the time of this revised request:

- The Bow River culvert opened to traffic on the 3rd December
- The Killoe Creek culvert opened to traffic on the 15th December
- The final spray seal was applied to Ringwood Road on the 13th December.

Given the busy time of year, Upper Hunter Shire Council are not expected to visit the site until January to issue practical completion. Following this, residual activities associated with the road upgrades may include demobilising site facilities, weed control, and hydro-mulching.

Adopting the precautionary principle, Lightsource bp is requesting an extension of the timeframe to complete the Ringwood and Wollara Road upgrades until **31 January 2026**, in order to accommodate unforeseen delays, ensure all works are delivered to the required standards and to allow sufficient time for the relevant roads authority (Council) to assess the works and confirm they are completed to their satisfaction.

Request

In accordance with Condition B7 of the Development Consent, Lightsource bp seeks the Planning Secretary's agreement to extend the timeframe for completion of the Ringwood and Wollara Road upgrades from six months after commencement of construction to be '*completion by 31 January 2026*'.

Additionally, we note that there may be ancillary activities associated with the Bow Creek culvert upgrade which may be unable to be completed before the timeframe required by Condition B7, Appendix 4 (SSD-33964533-PA-1), which is prior to use of Ringwood Road by heavy vehicles requiring escort. These ancillary activities will not impede on the ability of heavy vehicles requiring escort to use the upgraded culverts.

Justification

1) Weather-related delays

Unseasonal wet conditions over winter and early spring 2025 restricted access to work zones and impacted construction sequencing along both Ringwood and Wollara Roads. These conditions reduced productivity and limited the ability to complete works as programmed.

2) Extended timeframe for Section 138 approval

The potential risk of delays to the road upgrade scope was mitigated in the early stages of road upgrade construction by splitting approvals under section 138 of the *Roads Act 1993* into multiple applications.

The Project obtained two separate s138 approvals from Upper Hunter Shire Council (UHSC) for road upgrades along each of Wollara Road and Ringwood Road. A third application was submitted for the two culvert upgrades. When it became apparent that the design for Bow Creek culvert was more complex, it was split out into its own s138 application, to allow for work to commence on Killoe Creek culvert.

The Bow Creek culvert s138 approval was delayed due to multiple design iterations and requested changes. The s138 approval for the Bow Creek culvert structure works was issued in mid-August, four months after the application was submitted.

While this particular approval related directly to the culvert, upgrades on the section of Ringwood Road between Bow River and Killoe Creek could not be progressed until the final culvert alignment was confirmed to match in the horizontal and vertical geometry.

3) Coordination of Wollara Road tie-ins with private driveways

Design and construction of the Wollara Road driveway tie-ins required extensive consultation with USHC and affected landholders to ensure designs met the required standards and resolved property access arrangements. Negotiations were required for more than 20 individual properties. This approach was necessary to achieve the appropriate outcomes for each property, however resulted in significant delay to the final design being issued.

Bow River Culvert Completion

It is further noted that some ancillary works associated with the Bow River culvert may extend beyond 31 January 2026, in order to minimise impacts on biodiversity in the area. Please see supporting consultation documentation submitted as part of this Request. Works potentially affected are finishing works for the site, including:

- Removal of a rock check dam
- Installation of scour protection.

These works do not impact the operational functionality of the new culvert or its ability to comply with heavy vehicle requiring escort transport requirements. The final scheduling of these ancillary works can occur once advice has been received from relevant fauna experts (pending).

Summary

Lightsource bp remains committed to delivering all required road upgrades in full compliance with the current Austroads Guidelines and Australian Standards, to the satisfaction of the relevant roads' authority.

Granted an extension to 31 January 2026 would enable completion of the Ringwood and Wollara Road upgrades to a high standard without compromising safety, quality, or environmental performance and provide sufficient time over the busy holiday period for Council to assess that the works are to their satisfaction.

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