

9 March 2026

TfNSW reference: REN25/00016/002

Your reference: SSD-59155459 (PAE-102551216)

Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Nicholas Kumar

SSD-59155459, Merino Solar Farm; Response to Environmental Impact Statement

Dear Nicholas,

Transport for NSW (TfNSW) is responding to Merino Solar Farm, exhibited from 14 January 2026 and referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by NGH Pty Ltd, dated 7 November 2025, and Traffic Impact Assessment (TIA) prepared by Amber Organisation, dated 8 August 2026, as key documents for preparing this response.

The information provided in the EIS does not demonstrate that Merino Solar Farm has mitigated the traffic safety, efficiency and risks to TfNSW assets on the State road network. TfNSW requests additional information to address the key issues identified below and further detailed in **Attachment A**, to form part of a revised TIA and EIS (where applicable), to be submitted with the Response to Submissions (RtS).

Key issues:

1. Safe Intersection Sight Distance (SISD) at the Braidwood Road & Painters Lane
2. Use of network and construction peak hours for traffic assessments
3. Comments regarding the OSOM Route Assessment
4. Strategic design presented for Access Point 4
5. Minor issues

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment A**. If you have any questions, please contact Emily Lu, Development Services Case Officer, at 1300 019 680 or email development.renewables@transport.nsw.gov.au

Yours sincerely,



Alexandra Power
A/ Manager Development Services - West
Transport Planning
Planning, Integration and Passenger

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SSD-59155459, Merino Solar Farm; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 9 March 2026 reference REN25/00016/002.

TfNSW additional information requested | TfNSW comments

TfNSW requests additional information on the key issues identified below to be included in a revised TIA and EIS (where applicable) and submitted with the Response to Submissions (RtS). It must be clear where changes have been made in the revised TIA, either as a document with tracked changes or as a table in the updated TIA detailing where and what changes have been made.

1. Key issue 1: Safe Intersection Sight Distance

The Safe Intersection Sight Distance (SISD) at the Braidwood Road & Painters Lane intersection is insufficient. Desktop reviews of the intersection show a crest on Braidwood Road when viewed from Painters Lane, which impacts the SISD for the right-out turn from Painters Lane onto Braidwood Road; see Figure 1.

To assess the deficiency, the revised TIA is to provide a longitudinal section to demonstrate the existing SISD and identify mitigation measures physical modification or traffic mitigation measures to achieve compliance with SISD.

An example of a mitigation measures to achieve compliant SISD would be banning the right out turn from Painters Lane onto Braidwood Road and use of the Painters Lane then continuing Painters Lane to complete a left turn on Windemella Road to travel to Goulburn or the Hume Highway.

2. Key issue 2: Network and construction peak hours for traffic assessments

The TIA identifies the background network peak hours as 8-9AM and 3-4PM, and the construction peak hours as 6-7AM and 6-7PM.

The worst-case scenario, which includes assessing construction peak-hour project traffic against the network peak-hour background volume (including growth rate and cumulative traffic).

If the Applicant does not wish to assess this scenario, TfNSW would advise that conditions would be required to restrict the project traffic volumes to the project peak hour.

3. Key issue 3: OSOM Route Assessment

a. Bridge assessments

Bridge and culvert assessments are required for TfNSW assets and can be obtained by contacting spu@transport.nsw.gov.au. The result of bridge assessments may require a change to the route, which must be accounted for in the updated route assessment.

When obtaining the bridge and culvert assessment, please include the NHVR Route ID, which can be obtained via the NHVR Go map website.

The results of the bridge and culvert assessment are to be included in the revised TIA.

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b. Median and shoulder crossing

There are multiple instances of swept paths showing the vehicle chassis traversing outside of the paved road area and/or onto raised medians, including, but not limited to, at:

- Braidwood Road/Sloane Street, Goulburn,
- Ottiwell Street/Braidwood Road/Bungonia Road, Goulburn,
- Industrial Drive/George Street/Selwyn Street, Mayfield North, and
- Hawksbury Rest Area (Pacific Highway), Mooney Mooney.

These examples are shown in Figures 2 – 5 below for ease of understanding. Note that these are just a few examples, and there may be additional instances across the OSOM route. It is the Proponent's responsibility to ensure that all vehicle movements are on sealed pavement.

For pinch points where medians are traversed: TfNSW requires revised swept paths and, if applicable, the scope of works in the form of a strategic concept design that identifies the removal or modification of the refuge islands, curbs or medians that would be required. Mountable curbs and medians are to be demonstrated to be suitable to withstand the mass of the OSOM within a revised TIA.

For pinch points where shoulders are traversed, Strategic concept designs are to be updated and provided with road and/or shoulder widening pavement designs. Pavements are to be designed to withstand frequent heavy vehicle loads, per the Austroads Guide to Pavement Technology Part 2: Pavement Structural Design. The hardstands and pavement are to be sealed to the standards of the adjacent road.

Please refer to the advisory notes for additional information on strategic concept design requirements.

c. Rail crossing

The OSOM access routes will cross the Country Regional Network (CRN) rail corridor at three locations:

- Braidwood Road Route crossing CRN Overbridge at Goulburn NSW
- Braidwood Road Route crossing CRN Overbridge at Goulburn NSW
- Hume Highway Route Crossing Hume Highway North and South Overbridge at Yarra NSW

- i. The amended EIS documents should include detailed Heavy Vehicle and OSOM route information (for both construction and operation traffic) at the crossings listed above as well as any other identified crossings on CRN corridors.
- ii. If the applicant intends to use UGLRL-managed assets or infrastructure for OSOM/heavy vehicles, including crossings, for OSOM or heavy vehicle movements, a permit request must be submitted via the National Heavy Vehicle Regulator (NHVR).
- iii. It is noted that the proposed transport routes from the Port of Newcastle and Port of Melbourne may intersect rail corridors managed by agencies other than Transport for NSW (TfNSW), such as the Australian Rail Track Corporation (ARTC). It is recommended that the applicant undertake appropriate consultation and obtain necessary approvals from the relevant rail infrastructure managers for any such crossings.

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4. Key issue 4: Intersection design

TfNSW raises the following comments regarding the strategic design provided for Access Point 4 near the Braidwood Road and Painters Lane intersection:

- a. A barrier line marking is recommended on Painters Lane to enable better channelising of vehicles.
- b. The left turn out of Painters Lane should be line-marked according to the standard intersection radius, with possible chevrons in the shoulder. This is to minimise light vehicles approaching the intersection at an undesirable angle for a left turn. It is also noted that trees may be impacted in this location.
- c. Painters Lane should be sealed beyond the new access point near Braidwood Road to minimise tracking of loose material onto the highway.

Reasoning: Widening Painters Lane to 7m without sealing may drive dust, loose material, edge break and rutting, affecting sight distance, braking, cyclist/horse rider safety and liveability for adjacent receivers, especially in dry/windy periods.

- d. Provide a typical section of the drainage arrangements (slopes, ratio of the slopes and table drain dimensions) for the intersection of Painters Lane and Braidwood Road.
- e. Proposed yielding line type and any guidance line on Painters Lane will need to be determined once line marking and delineation plans are provided in the next phase. This may include additional line marking and signage.

5. Further minor issues:

- a. Emergency access point

Measures to enforce the emergency access point off Braidwood Road as an emergency access-only point are to be included in the revised TIA.

- b. Bus stops

Temporary bus stop treatments for school buses on Braidwood Road need advance warning signs where children congregate, and marshal/traffic controller on high-risk days with high project volumes, and high heavy vehicle/OSOM movements. These mitigation measures are to be included within the revised TIA.

Advisory notes

1. Strategic concept designs must be provided for any works required along the State road network route. Strategic concept design is to be produced by TfNSW's Strategic design requirements for DAs. The factsheet can be found here: <https://www.transport.nsw.gov.au/system/files/media/documents/2024/Strategic-Design-requirements-for-DA-Factsheet.pdf>.
2. Pavements are to be designed to withstand frequent heavy vehicle loads per Austroads *Guide to Pavement Technology Part 2: Pavement Structural Design*. The hardstands and pavement are to be sealed to the standards of the adjacent road.

Figures

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Figure 1: Crest on Braidwood Road, looking south from Painters Lane intersection. (Source: Google Maps)



Figure 2: Vehicle chassis outline on raised median (indicated with blue oval) at Sloane Street/Braidwood Road, Goulburn. (Source: Appendix A of TIA)

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Figure 3: Vehicle chassis outline on raised median (indicated with blue oval) at Ottiwell Street/Braidwood Road/Bungonia Road, Goulburn. (Source: Appendix A of TIA)

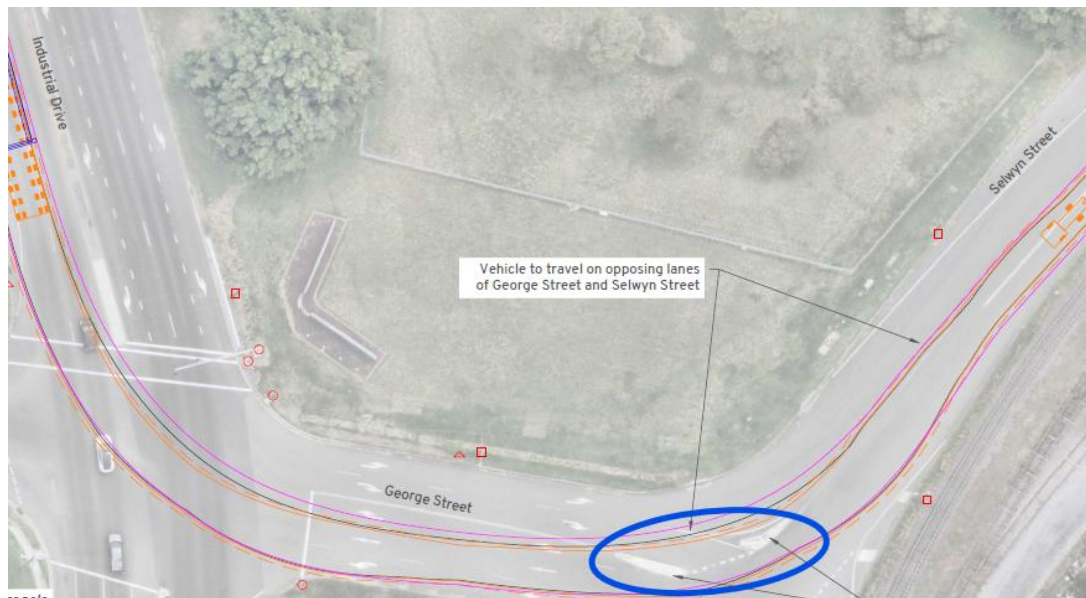


Figure 4: Vehicle chassis outline on raised median (indicated with blue oval) at Industrial Drive/George Street/Selwyn Street, Mayfield North. (Source: Appendix B of TIA)

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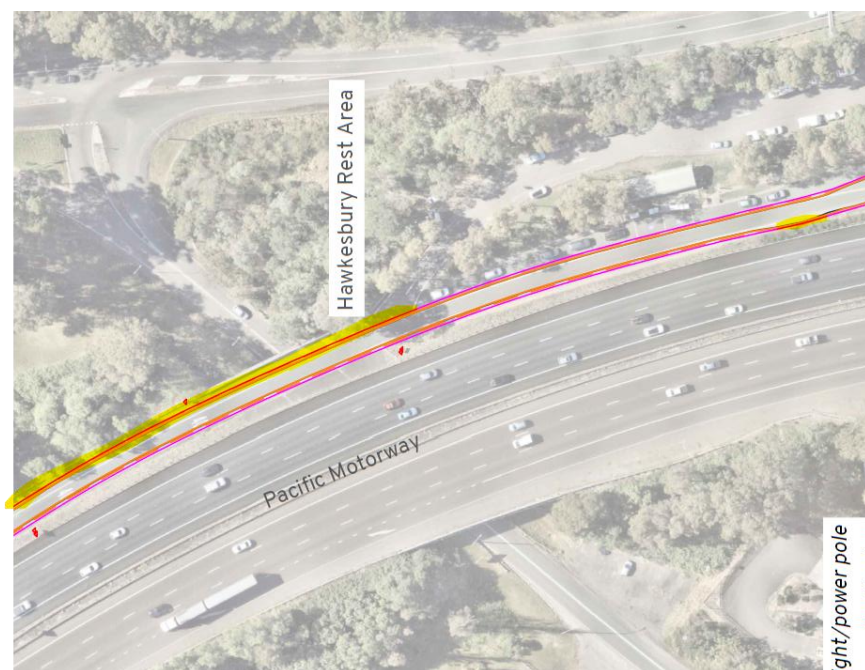


Figure 5: Vehicle chassis outline beyond paved road area (indicated with yellow highlight) at Hawkesbury Rest Area (Pacific Highway), Mooney Mooney. (Source: Appendix B of TIA)

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