

9 March 2026

TfNSW reference: REN 25/00065/002, SF 2025/037295

Your reference: SSD-72383210

Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124
By Email: Rita.Hatem@planning.nsw.gov.au

Attention: Rita Hatem

SSD-72383210, Forbes Solar Farm and BESS, 207 Hooper Road Forbes; Response to Environmental Impact Statement & TIA

Transport for NSW (TfNSW) is responding to the Forbes Solar Farm and BESS, exhibited from Friday 23 January 2026 until Friday 20 February 2026 and referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) Forbes Solar Farm Project Number: 240184, prepared by NGH Final V2 dated 17 November 2025, and Traffic Impact Assessment (TIA) Reference: 1026 rep 250828 final, prepared by Amber Organisation, dated August 2025, as key documents for preparing this response.

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

Key issues:

- Traffic and asset impact assessment for the pre-construction minor works required.
- Modifications to the supplied strategic concept designs required.
- Further details required for the High-risk OSOM route analysis.
- Cumulative impacts – affects turn warrant assessment, needs to be included in worst-case scenario, source of truth.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment A**. If you have any questions, please contact Alexandra Long, 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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This attachment relates to TfNSW's response dated 9 March 2026 reference REN 25/00065/002.

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). The revised TIA is to be included within the Response to Submissions (RtS). It must be clear where changes have been made in the revised TIA, either by a document with tracked changes or by a table provided in the updated TIA.

Refer to the advisory notes below for information to assist with revising the TIA.

1. Traffic Analysis Peak of Construction

The application proposes primary site access via Newell Hwy/ Daroobalgie Road

To ensure compliance with forecast traffic demands, it is recommended that appropriate caps and vehicle restrictions be imposed as conditions of approval to support the suitability of the CHR/AUL treatment. Should traffic volumes exceed these thresholds, a higher-grade intersection treatment and/or other mitigation measures may be required.

2. OSOM Route Assessment

- a. The proponent is requested to provide justification for the selection of the proposed OSOM route, noting that the current route includes multiple contraflow movements, which may introduce additional operational and safety considerations. Further clarification is required on whether alternative routes were investigated to minimise these movements.
- b. The proponent is also requested to confirm whether consultation has been undertaken with Dubbo Regional Council regarding the proposed route through Dubbo, noting the potential impacts and safety concerns to the residential areas.
- c. A consistency check is to be submitted for the section of the route along EnergyCo's Port to Central West Orana REZ works, and the Port to New England REZ works. For the Port to New England REZ works, EnergyCo is currently developing its Port to REZ strategy, including potential haulage routes for OSOM movements (construction and operational), funding and delivery arrangements. Until this strategy is complete, the timing and final nature of road upgrades along the New England REZ route is uncertain. TfNSW recommends, based on the above, that the proponent determine a contingency for the route and secure all relevant approvals.
- d. The Parkes By-pass is now open updated route assessment is to be provided.

Note: The OSOM route will require updating following the completion of any additional State Road projects.

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- e. The route study demonstrates that TfNSW assets will be traversed by the high-risk OSOM. The impacted infrastructure will need to be identified, and strategic concept designs will be provided for any required works. The proponent can consider changing the vehicle configuration, changing the route or modifying / temporarily removing the infrastructure. Examples of road upgrades or modifications to this type of infrastructure include pavement strengthening, removal or partial removal of the infrastructure, or removal and replacement with a suitable alternative that complies with Austroads and TfNSW requirements.)
- f. NHVR Route ID has not been provided. This is required to ensure a complete assessment of route considerations has been provided. See advisory note.
- g. Bridge and culvert assessments are required for the route. See advisory note.
- h. The updated information will need to clarify how long traffic will be stopped (TfNSW notes traffic cannot be stopped for more than 10 minutes) at each complex pinch point that is required to be negotiated on the state road network.
- i. Any other TfNSW projects along the route should be noted and identified in the route study
- j. The pull-over bays and rest areas have been identified with swept paths. Plans to be updated to identify and demonstrate full dimensions.
- k. Rail requirements and crossing are to be considered. See advisory notes.
- l. Any planned works that impact the State Road network will require a Road Occupancy Licence (ROL) to be issued. This includes signage or road upgrades associated with OSOM movement requirements.

3. Assessment of cumulative impacts of nearby Developments

Given the potential for overlapping construction activities and cumulative traffic generation, the impacts on the local road network – particularly at the Newell Highway / Darroobalgie Road intersection – are considered likely to be notable and warrant further detailed assessment.

Accordingly, it is recommended that the Traffic Impact Assessment be reviewed and updated to incorporate cumulative traffic impacts associated with nearby approved or proposed developments, including but not limited to the Darroobalgie Solar Farm and the proposed expansion of the Central West Nutrient Return Centre.

The updated assessment should:

- Consider cumulative construction traffic volumes from concurrent developments.
- Assess the operational performance and safety of the Newell Highway / Darroobalgie Road intersection and surrounding road network under cumulative traffic conditions.
- Identify and implement appropriate mitigation measures to ensure the safe and efficient operation of the road network.

4. Strategic Concept Design Amendment

- a. Multiple OSOM turn paths show the vehicle is to mount the existing kerb infrastructure. This will induce extra wear and tear on the infrastructure and possibly reduce its integrity in the future once the OSOM vehicles are completed. Further justification is required, including identification of impacted infrastructure and proposed mitigation measures. The proponent should consider modifying the vehicle configuration, revising the route, or upgrading/removing the affected infrastructure in accordance with Austroads and TfNSW requirements.

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- b. The drawings reference a “Temporary Hardstand Area”. Further clarification of what this area will comprise is required. It is noted that the area is to be made trafficable; however, details of the proposed treatment have not been provided.?
- c. Appendix E3 - 1026 RA01B - MGA56 sheet 13, 16 - The temporary hardstand and mountable kerb should allow the function of the pedestrian refuge crossing in this area. Details to be revised.
- d. Appendix E3 - 1026 RA01B - MGA56 sheet 25 Vehicle swept path shows traversing over the centre median on Hartigan Avenue. Will this be replaced with mountable kerbing? Or will this median be maintained and reinstated after the OSOM movements are complete? Further clarification is required.

5. Rail

It is noted that the proposed transport routes from the Port of Newcastle may intersect rail corridors managed by agencies other than Transport for NSW (TfNSW), such as the Australian Rail Track Corporation (ARTC) and Sydney Trains. A permit request must be submitted via the National Heavy Vehicle Regulator (NHVR).

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TfNSW Advisory Notes

1. Strategic concept designs are required for works along the state road network route. <https://www.transport.nsw.gov.au/system/files/media/documents/2024/Strategic-Design-requirements-for-DA-Factsheet.pdf>
2. Turn treatments must comply with Austroads Guide to Road Design Part 4A, here: <https://austroads.gov.au/publications/road-design/agrd04a>
3. Safe Intersection Sight Distance (SISD) must comply with Austroads Guide to Road Design Part 4A and TfNSW supplements to Austroads, noting that TfNSW adopts different reaction times for SISD. AGRD04A | Austroads
<https://austroads.gov.au/publications/road-design/agrd04a>
4. Austroads Design Vehicles and Turning Path Templates (AP-G34-23) must be reviewed for swept path analysis requirements.
5. The updated route study must include a reference to a Route ID utilising the NHVR portal website. <https://www.service.nhvr.gov.au/#page=informationHub/routePlannerTool>
6. The rest areas and pull-over locations are required to be sufficient to comply with NHVR fatigue management requirements and any day or nighttime travel restrictions on the network.
7. Turn warrant assessments are to be in accordance with Section 3.25 of Part 6 of the Austroads Guide to Traffic Management.
8. Bridge assessments for TfNSW assets can be obtained by contacting spu@transport.nsw.gov.au.
9. All pavement that is to accommodate the project traffic, heavy vehicles, light vehicles, and high risk OSOM, is to consist of permanent pavement treatments that are consistent with the existing state road pavement.
10. As the overall combination height exceeds 5m, the operator will require third-party electrical approval.

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11. If the proponent requires the use of UGLRL assets, the applicant must consult with UGLRL. This can be done through lodgment of a request for a permit via the National Heavy Vehicle portal, or directly to UGLRL via “heavyvehicle@uglregionallinx.com.au”. The applicant must

submit the request at least two (2) months before passage and include the specifications of their OSOM and heavy vehicles (axial loading and axial spacing as well as dimensions of the heavy vehicles) with the lodgment of the request.
12. It is advised that the proposed haulage routes would also be crossing the rail corridors managed by Agencies other than TfNSW. It is recommended that the DPHE should refer this application to other relevant agencies (e.g. ARTC and Sydney Trains).

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