Transport for NSW

11 December 2024

TfNSW reference: WST24/00399/001 | SF2024/210066
Your reference: SSD-48225958

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

Attention: Cameron Ashe

SSD-48225958 – Gundary Solar Farm – Windellama Road, Gundary – EIS response

Dear Cameron,

Transport for NSW (TfNSW) is responding to the Environmental Impact Statement (EIS) for SSD-48225958 – Gundary Solar Farm, exhibited from 15 November 2024.

TfNSW has reviewed the EIS prepared by Umwelt dated 14 October 2024 and Appendix 14 – Transport Impact Assessment (TIA) Prepared by The Transport Planning Partnership (TTPP) dated 1 August 2024 as key documents for preparing this response.

The information provided in the EIS does not demonstrate that Gundary Solar Farm has mitigated the 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 1**, to form part of a revised TIA and EIS (where applicable), to be submitted with the Response to Submissions (RtS). The additional information will assist the Department of Planning, Housing and Infrastructures' (DPHI) assessment in respect to section 4.42(1)(f) of the *Environmental Planning and Assessment Act 1979.*

Key issues:

1. A route assessment from the Port to the site has not been provided. This is necessary to ensure the high-risk oversize and overmass vehicles needed to deliver from port to site identify any traffic mitigation measures and road upgrades required to undertake the high-risk OSOM movement for the project. Refer to key issue 1 details.
2. Traffic Generation, transport routes and distribution – The traffic generation of the development needs to be identified and added to the road network, to assess the impact of the development. Refer to key issue 2 details.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment 1**.

If you have any questions, please get in touch with Tim Mitchell, Development Services Case Officer, at 1300 019 680 or email development.renewables@transport.nsw.gov.au

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Yours sincerely,

Sarah Anderson

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Attachment 1

SSD-48225958 – Gundary Solar Farm – Windellama Road, Gundary – EIS response

This attachment relates to TfNSW's response dated 11 December 2024 reference WST24/00399/001.

TfNSW additional information request

TfNSW requests the additional information of the key issues identified and as detailed 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, which can be in the form of a document with tracked changes or a table provided in the updated TIA detailing where and what changes have been made.

Key Issue 1: Concept Level Route Analysis required for High Risk OSOM

1. The route assessment is required for high risk OSOM (as defined on TfNSW website) delivering components to the project. The concept level route analysis must include:
   a) Port or point of origin for the entire route to the site access and intersections required to facilitate the high-risk OSOM movements required for the project.
   b) Overall combination type, configuration, load and vehicle configuration.
   c) The laden dimensions and weight of the vehicle configuration and loads.
   d) The TIA is required to include details of all high-risk OSOM loads and vehicle configurations for the project.
   e) Swept path analysis for the largest high-risk OSOM vehicles demonstrating that the largest high-risk OSOM vehicle can physically enter, exit and park without impacting travel lanes and that sufficient parking and access will be provided to other vehicle types permitted to access the identified rest area or pullover locations.
   f) Bridge Assessments for any at risk bridges on classified roads due to dimensions and weight of OSOM vehicles. Contact spu@transport.nsw.gov.au to apply for a bridge and culvert assessment review of TfNSW assets.
   g) Swept path analysis for the largest and longest high-risk OSOM navigating each pinch point or intersection along the state road network.
   h) Identify each at-risk road structure that the high-risk OSOM route crosses, traffic signals, signage, powerlines, bridges (including height clearances to overpasses and trusses), major culverts, and minor culverts that may not meet the desirable cover to cater for proposed axle loads.
   i) Traffic mitigation measures or road works, modifications, or road upgrades to facilitate the movement of the high risk OSOM(s) on the state road network around, though, under or over any at-risk road structure that has been identified from the review and assessment of the above point (h).

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j) Potential high level mitigation measures or commitments to mitigate known traffic, safety and impacts to road users along the high risk OSOM route (i.e., school bus routes, mining shift changes, TSRs, harvest periods and events).

k) Identify and assess the implications of moving the high-risk OSOM through any road and rail projects that may be under construction or will be completed during the indicative schedule for the high-risk OSOM movements.

l) The Hexham Straight is a notable project impacting Route 2. The route assessment must assess the alternative route via Newcastle Inner City Bypass to Newcastle Road for high-risk OSOM loads that do not exceed the vertical clearance limitations.

m) Where there is reliance on the EnergyCo P2R road upgrades to facilitate the project's high-risk OSOM movements, then the pavement extents, scope of work, and bridge assessments for the P2R project are to be reviewed and assessed in relation to the project proposed high-risk OSOM vehicle configuration and loads. Evidence of the consistency check with the EnergyCo P2R project is to form part of the high-risk route assessment.

Notes:

The approved OSOM network referred to in the TIA only applies to combinations that comply with the Multi State Mass and Dimension notices and not high-risk OSOM combinations.

NHVR permits do not cover road works or upgrades and environmental approvals required along any proposed OSOM route. Any road works or upgrades works required along the OSOM route must be included within the scope of works in the SSD to ensure the development is constructable.

Given high number of renewable energy and other large scale projects requiring road haulage of OSOM components, restrictions, and limitations on OSOM movements may be in imposed. In this regard, it is recommended you engage earlier with TfNSW's Development Services Renewables team to discuss requirements of the route assessment.

Key issue 2: Traffic Generation and distribution

The traffic generation of the development needs to be shown diagrammatically and applied to the road network to assess the impact of the increased traffic on the state road network. The TIA is to be updated to includes:

1. Traffic volumes:
   a) Project-related traffic volumes (measured as vehicle trips per an hour and per a day) for each stage including pre-construction, construction, operation, and decommissioning and identifying peak period(s) for traffic volumes.
   b) Table 5.2 of the TIA show hourly construction traffic, which includes 63 light vehicles outbound at midday(12-1pm) and only 32 light outbound in PM peak hour (3-4pm).
   c) No information has been provided on the directional splits of construction traffic on the road network. Confirm which direction is the construction traffic coming form to the site, and if it is all accessing from Goulburn.
   d) The SIDRA analysis is to be revised to include all the traffic generation as not all the traffic generated has been included in the SIDRA intersection analysis.

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e) Background traffic growth is to be applied to the existing traffic count to the year of peak construction.

f) Show the project traffic added to each intersection that has been analyzed in the TIA.

2. The origin, destination and routes are to be shown for:
   a) Employee and contractor light traffic.
   b) Shuttle buses.
   c) Heavy vehicle traffic.
   d) OSOM vehicle traffic.
   e) OSOM high risk loads.
3. Merino Solar Farm has been included in the assessment. TfNSW only requires assessment of cumulative impacts of developments at EIS stage or where approved. As Merino Solar Farm has not yet reached EIS stage it does not need to be included in the assessment.
4. TfNSW notes that the preferred route from Hume Highway to the site is option 2. Clarity is required if this is the proposed route and if option 1 route is still being pursued as part of the EIS. If both options are proposed then both options are required to be assessed.
5. Shuttle buses have been proposed. Further clarity is required regarding accommodation locations or the workforce, route of travel to the site, shuttle bus locations for pick up/drop off. How will the measure be implemented to ensure that construction workers will uptake the shuttle bus transport to site.

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