

13 June 2025

TfNSW reference: REN25/00060/002  
DPHI reference: SSD-55968733

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

**Attention: Rita Hatem**

**SSD-55968733 – Burroway Solar Farm, Advice on RTS, Narromine Shire Council**

Dear Rita,

Transport for NSW (TfNSW) is responding to the Burroway Solar Farm response to submissions (RtS) referred via the Major Projects Portal.

TfNSW has reviewed the additional information prepared by the proponent, including the updated Traffic Impact Assessment prepared by Amber Consulting dated 8 April 2025, as key documents for preparing this response.

Key issues 1 and 2 raised in TfNSW's response (dated 11 November 2024) to the Environmental Impact Statement (EIS) have not been satisfactorily addressed, and further clarification is required on these outstanding points as detailed within **Attachment 1**.

Attachment 1 includes a table that clarifies the status of the additional information previously requested by TfNSW, identifying issues which still require resolution and those which have been satisfied (closed), outlining what further information is required to address the remaining outstanding points.

TfNSW key rationale for requesting the information is to demonstrate that the designs comply with Austroads, establish the scope of works and mitigate the impacts of the project on the state road network from a safety, efficiency and asset management perspective.

TfNSW can meet with DPHI and the applicant to discuss the information in **Attachment 1**. If you have any questions, please contact Glen Hanchard, Development Services Case Officer, at 1300 019 680 or email [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au).

Yours sincerely,



**Sarah Anderson**  
Manager Development Services - West  
Transport Planning  
Planning, Integration and Passenger

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## SSD-55968733 – Burroway Solar Farm, Advice on RTS, Narromine Shire Council

This attachment relates to TfNSW's response dated 3 June 2025 reference REN25/00060/002.

### TfNSW Advisory Notes

The advisory notes section is provided for references to any processes, policies, standards, weblinks, or general TfNSW information and is intended to assist with revising the TIA.

1. Strategic concept designs are required for works along the state road network route. [Strategic-Design-requirements-for-DA-Factsheet.pdf](#)
2. The updated route study must include a reference to a Route ID utilising the [NHVR](#) portal website.
3. Bridge assessments are to be completed for the movement of the transformer through the route. They can be obtained for TfNSW assets via [spu@transport.nsw.gov.au](mailto:spu@transport.nsw.gov.au).
4. The route from Port Botany identifies routes to travel along Motorways in Sydney operated by private entities (for example, Transurban). Contact with motorway operators will be necessary.
5. The proponent will need a Road Occupancy License and a Section 138 applied for through the council with [concurrence](#) from TfNSW, as core log samples with a maximum diameter of 100mm will be required. The supporting documentation will need to detail within a report the pavement layers and type.
6. To clarify whether OSOM fall into the high risk category please see the following link: [Oversize and/or overmass \(OSOM\) vehicles and loads | Transport for NSW](#)

### Additional required information | TfNSW comments

TfNSW requests the additional information, as detailed below, to be included in a revised TIA and EIS (where applicable) and submitted for review. It must be clear where changes have been made in the revised TIA, which can be a document with tracked changes or a table provided in the updated TIA detailing the changes made, including where and what they are.

TfNSW has provided the table below which identifies the status of information that has, or not, been addressed satisfactorily and provides further clarification on what additional information or assessment is needed to address the outstanding information previously requested by TfNSW.

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No.	TfNSW comments from EIS requiring RFI	TfNSW response in relation to RTS and request for further information for revised TIA
1	<p>Concept Level Route Analysis required for High Risk OSOM</p> <p>The TIA has not included a Concept Level Route Analysis (high risk OSOM (as defined on TfNSW website)). This analysis must include:</p> <p>a) The port or point of origin and must be for the entire route to the site access or intersections required to facilitate the high risk OSOM movements required for the project.</p>	<p>OPEN - Route Analysis provided in Appendix H of the TIA.</p> <p>TfNSW requires clarification on whether the term vehicle envelope within the swept path analysis represents the wheel path tracks of the high-risk OSOM load.</p> <p>The proponent is to confirm specific dimensions, including weight (currently only a range provided) and if the OSOM-laden loads (vehicle configuration + load) is defined as a high-risk OSOM.</p>
b)	<p>The TIA is required to include details of all high risk OSOM loads and vehicle configurations for the project.</p>	<p>OPEN - See comment above.</p>
c)	<p>The location of pull-over bays / rest areas along the high risk OSOM routes (including GPS coordinates) and demonstrate through swept paths that the high risk OSOMs can be physically accommodate all high risk OSOMs for the project (in terms of size, width and accessibility).</p>	<p>CLOSED - Pullover bays shown on provided plans.</p>
d)	<p>Details of the road geometry and alignment along the identified transport route/s, including existing formations, crossings, bridges, intersection treatments; and any pinch points along the routes such as bridges, culverts, traffic signals, signage, roundabouts, medians, and vegetation. Mitigation measures or road upgrades must be identified for each pinch point.</p>	<p>CLOSED - High-risk OSOM route assessment provided.</p>

<p>e)</p>	<p>Bridge and culvert assessments are required for TfNSW assets and can be obtained by contacting: spu@transport.nsw.gov.au.</p> <p><i>Note: The result of bridge assessments may require a change to the route which must be accounted for in the updated route assessment.</i></p>	<p>OPEN - Outcome of Bridge assessments should be included in the updated TIA. TfNSW understands that they have been lodged to SPU and are currently being undertaken. Once complete they should be included within the updated document.</p>
<p>f)</p>	<p>The high-risk OSOM movement swept paths for the check vehicle and road upgrades are required to be assessed for the high risk OSOM movements at pinch points along the route.</p>	<p>OPEN - Swept paths are provided for the high-risk OSOM. TfNSW notes that the swept paths identify that high-risk OSOM will traverse over state infrastructure.</p> <p>The proponent is to investigate the structural integrity of the two medians that will be traversed by the high-risk OSOM vehicle configuration (which will involve core log testing). TfNSW will need to review the outcome of this investigation.</p> <p>If the existing pavement is not suitable, the proponent will need to provide strategic designs of the median that identify the scope of work required to strengthen the pavement of the median(s). Strategic concept designs are required for any identified works, see advisory notes.</p> <p><i>Note: core log samples will need to be taken as part of this investigation, which will require a s138 Roads Act approval and ROL.</i></p> <p>The two medians that require investigation:</p> <p><b>Port of Newcastle Route</b></p> <ul style="list-style-type: none"> <li>• Bettington Street median near car park.</li> </ul> <p><b>Port Botany Route</b></p> <ul style="list-style-type: none"> <li>• Anzac Parade/Bunnerong Road intersection</li> </ul> <p>Further clarification is also required on the Botany Route, specifically regarding Marsden Road and the concrete barrier on the roadway. This is a tight movement on the turn that has the potential to damage the metal and concrete barrier separating the opposing lanes.</p>

<p>g)</p>	<p>Consideration of how the high-risk OSOM will move through TfNSW projects that are currently under construction or will be completed, when the high-risk OSOM movements will be required to be moved from the Port of Newcastle to site. This is required to assess the viability and any modification to the road environment that may be required to move the high-risk OSOM via this route. The projects to be assessed, but not limited to, are the Pacific Motorway extension to Raymond Terrace and the Hexham Straight Project. Details on these projects are available on the TfNSW project websites.</p>	<p>CLOSED - Projects are considered in Section 6.4. TfNSW notes that contact with project teams should occur, and any considerations should be included within the TMP.</p>
<p>h)</p>	<p>Consideration of road upgrades provided by EnergyCo from the Port of Newcastle to Elong Elong. The applicant must review pavement extents and the scope of works to ensure configurations and swept paths for this project’s high-risk OSOM align with the scope of the Port to Renewable Energy Zone (P2R) project, particularly the relocation of traffic signals at the George Street, Industrial Drive and Maitland Road intersections. An assessment of consistency with the P2R project must be included.</p>	<p>CLOSED - Port to REZ compliance is discussed in Section 6.4.3. TfNSW notes that this section only discusses the route from Newcastle; however, the Port Botany route will also utilise sections along the Golden Highway.</p>
<p>i)</p>	<p>The refuge island at Bettington Street / Vernacher Street Merriwa is located on a state classified road (Golden Highway). TfNSW requires the scope of works in the form of a strategic concept design identifying the removal of the refugee island and evidence of consultation with Upper Hunter Shire Council.</p>	<p>OPEN - The swept path shown in the Appendix for pinch points 34 and 35 appears to demonstrate the high-risk OSOM vehicle wheel path tracking over the parking bays, with no evidence of consultation provided. This pinch point has been identified on several projects travelling through this location. TfNSW have been requesting a detailed plan made in consultation with Upper Hunter Shire Council demonstrating manoeuvres through this pinch point from proponents.</p>

j)	<p>Timing of high-risk OSOM deliveries within the construction schedule, indicative weekly program(s), and timeframe to complete deliveries from relevant port to the site is required.</p>	<p>CLOSED - To be addressed within the traffic management plan.</p>
2	<p>Rail Comments in relation to the development :</p> <p>The applicant must be aware of the crossings on CRN rail corridors located along the transport routes associated with the proposed development. Two routes have been proposed for heavy vehicle and OSOM vehicles access to the site:</p> <ul style="list-style-type: none"> <li>• Proposed access route from the Port of Botany to Site,</li> <li>• Access Route from Port of Newcastle to Site.</li> </ul> <p>Both proposed construction access routes will be crossing CRN rail corridor at two (2) locations:</p> <ul style="list-style-type: none"> <li>• Boothenba Road Crossing operational rail corridor from Dubbo to Coonamble at Dubbo,</li> <li>• Golden Highway route: Crossing non-operational rail corridor from Sandy Hollow to Merriwa at Gungal.</li> </ul> <p>Information regarding these crossings is to be provided in the RTS and revised TIA. If any adverse impacts to CRN corridors are identified, the applicant shall seek approvals from UGL Regional Linx (UGLRL) and TfNSW. The applicant must adhere to the transport management and safety requirements of UGLRL and TfNSW for the matters involving CRN corridor.</p> <p><i>Note: For OSOM/heavy vehicles travelling on UGLRL managed assets</i></p>	<p>CLOSED - The proponent has identified in Table 14 Rail crossings; however, it is noted there is incorrect identification of some of them as being managed by ARTC when they are managed by UGRL. The following can be conditioned.</p> <p>If the applicant wants to use UGLRL-managed asset or infrastructure for OSOM/heavy vehicles, the applicant must lodge a request via the National Heavy Vehicle portal or send the request directly to UGLRL via:  <a href="mailto:heavyvehicle@uglregionallinx.com.au">heavyvehicle@uglregionallinx.com.au</a>.</p> <p>The applicant must submit the specifications of their OSOM and heavy vehicles (axial loading and axial spacing as well as dimensions of the heavy vehicles) with the lodgement of the request. The request should be submitted at least two (2) months before actual passage to give UGLRL enough lead time for assessments. Once the request is received, UGLRL will issue a permit (including any required conditions) with an expiry date.</p>

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	<p><i>or infrastructure, the applicant must request a permit via the National Heavy Vehicle portal or send the request directly to UGLRL via <a href="mailto:heavyvehicle@uglregionallinx.com.au">heavyvehicle@uglregionallinx.com.au</a>. The request should be submitted at least two (2) months before movements and include specifications of OSOM and heavy vehicles (axial loading and axial spacing as well as dimensions of the heavy vehicles).</i></p>	
3	<p>The assessment focuses on the local road access intersection on Eumungerie Road. TfNSW requires further detail on the intersections with the state road network including Newell Highway / Burraway Road and the state classified section of Eumungerie Road / Newell Highway.</p> <p>This includes:</p> <p>a) Provision of a breakdown of project traffic volumes using the intersection including the amount of heavy vehicles / light vehicles per day, and</p>	<p>CLOSED - The proponent has provided percentage breakdowns of traffic for the Newell Highway/Burraway and the Mitchell Highway/Warren Road intersection.</p>
b)	<p>A breakdown of the worst-case scenario of the amount of project related heavy vehicles / light vehicles using the intersection during the identified network AM and PM peak hour and the impacts on queue length. The background network traffic volumes must include cumulative traffic from other projects (including those in planning at EIS stage).</p>	<p>CLOSED - Cumulative impacts have been included in Section 3.4.</p>
c)	<p>Application of annual growth applied linearly to the peak of construction.</p>	<p>CLOSED - Growth rate applied.</p>

<p>d)</p>	<p>Traffic count survey was collected on a single day in May 2023, which isn't reflective of the worst-case scenario for the network AM/PM peak hour which occurs during the harvest period.</p> <p>Traffic data is to be obtained or collected for the harvest period fluctuation for the Eumungerie Road/Newell Highway intersection and compared to the existing traffic assessment. Any recommendations to minimise the projects traffic impact during this period will need to be included within the revised TIA.</p> <p>Note: Traffic count data could be obtained from GrainCorp or Council for the harvest period for this section of the network.</p>	<p>CLOSED - As per point d of the previous letter, the traffic count survey was conducted on a single day in May 2023. No new updated traffic survey data has been included in the appendix however data has been extrapolated with an 8.7% increase in July for harvest season.</p>
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