

15 July 2025

TfNSW reference: REN25/00114/001

Your reference: SSD-64834490

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

Attention: Nestor Tsambos

SSD-64834490, Brewongle Solar Farm, 315 Tarana Road, Brewongle; Response to Environmental Impact Statement

Dear Nestor,

Transport for NSW (TfNSW) is responding to the Brewongle Solar Farm Environmental Impact Statement, exhibited from 23 May 2025 and referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by Environmental Resources Australia Pty Ltd dated 25 March 2025 and Traffic Impact Assessment (TIA) prepared by Amber Organisation dated 29 August 2024, as key documents for preparing this response.

The information provided in the EIS does not demonstrate that Brewongle 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 A** to form part of a revised TIA and EIS, 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. Oversize overmass (OSOM Laden Dimensions and Pull over bay information).
2. Oversize overmass (Assessment of Pinch Points).
3. O'Connell Road / Tarana Road intersection analysis .
4. Confirmation if Accomodation and pre construction works are required.

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,



Nathan Boscaro

Manager Development Services - West

Transport Planning

Planning, Integration and Passenger

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SSD-64834490, Brewongle Solar Farm, 315 Tarana Road, Brewongle; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 15 July 2025 reference REN25/00114/001.

TfNSW additional information requested | TfNSW comments

TfNSW requests the additional information of the key issues identified and as detailed below to be included in a revised TIA and EIS 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.

No.	TfNSW comments from EIS requiring RFI
1.	Oversize overmass (OSOM) comments a. Oversize overmass (OSOM) laden dimensions OSOM dimensions are to be provided and routes assessed with laden loads, not separated into truck and load specifications. The high-risk OSOM laden loads, class and vehicle configuration must include the following information regarding the dimensions, weight and length: • NHVR route ID, • Overall dimensions (width, height and length) of the laden load (laden load is the vehicle combination and the load to be transported), • Total weight of laden load, • GSM, • Payload, • deck height, • axle configuration, • axle spacing, including from the prime mover, and • axle masses (including split axle and group axle masses). b. Pull-over bays The location of pull-over bays / rest areas along high risk OSOM routes (including GPS coordinates) and swept paths demonstrating that high risk OSOMs can be physically accommodated for the project (in terms of size, width and accessibility) are to be included in the revised TIA.

2. **OSOM route pinch points**

Several pinch points which require further assessment have been identified along the proposed high-risk OSOM routes. Note that this list is not exhaustive and it is the Proponent's responsibility to provide a comprehensive high-risk OSOM route assessment.

The revised TIA is to provide strategic concept designs that identify the scope of roadworks, pavement strengthening, or modifications to the state road infrastructure (e.g., roundabouts, medians, traffic islands, pedestrian refuges) for locations where high-risk OSOM swept paths indicate high-risk OSOM traversing the state road infrastructure. Further information on strategic concept design requirements can be found in the advisory notes.

Note: Examples of road upgrades and modifications to this type of infrastructure include pavement strengthening (asphalt), removal or partial removal of the infrastructure, and removal and replacement with a suitable alternative that complies with Austroads and TfNSW requirements.

- a. Botany Road & Bunnerong Road intersection, Matraville
 - Strategic designs are to be provided for temporary hardstand and mountable kerb.
 - Where the OSOM will return to the correct side of the road is to be modelled in the revised TIA.
 - Clearance between load path and traffic control signal provides no allowance for driver error. A 1.0m clearance from traffic control signals and displays is recommended.
- b. Roundabout at Marsden Street & Pudman Street, Boorowa
 - Strategic concept designs are to be provided to include the scope of work for the removal or modification of the roundabout.
 - Swept path indicates the islands on Marsden Street may be crossed. Evidence/assessment of trafficability is to be provided within the revised TIA, or strategic designs for the removal or modification of traffic islands and medians are to be provided and must comply with AS1742.2.
- c. Lachlan Valley Way & Mid Western Highway, Cowra
 - Swept path indicates the islands on Lachlan Valley Way will be crossed. Evidence/assessment of trafficability is to be provided within the revised TIA, or strategic designs for the removal or modification of traffic islands and medians are to be provided and must comply with AS1742.2.
- d. Roundabout at Great Western Highway and Mitchell Highway, Bathurst
 - Clarification on whether a portion of the roundabout will be removed or if it is proposed to mount existing annulus(s). If mounting is required, assessment of the existing suitability or upgrades required to the roundabouts for the movements must be included.
 - Swept paths and road design plans are needed to confirm the impacts on the roundabout.
 - Strategic designs are to be provided for temporary hardstands and mountable kerbs.
- e. Durham Street & Stewart Street, Bathurst
 - Clearance between load path and traffic control signal provides no allowance for driver error. A 1.0m clearance from traffic control signals and displays is recommended.
- f. Roundabout at Great Western Highway & Littlebourne Street

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	- The swept path provided shows the vehicle chassis traversing outside of the paved road area, and over the median island (see figure 1). Strategic concept designs are to be updated and provided with road and/or shoulder widening pavement designs. g. Mid Western Highway, Lyndhurst - Sections of the Mid Western Highway south of Lyndhurst may be narrow. The timing of high-risk OSOM movements may require further consideration and modelling to understand the optimal timing of the high-risk OSOM movements on the state road network and impact of the high-risk OSOM movements through this segment of the corridor as the narrow widths of the travel lanes, minimal shoulders, overtaking opportunities, steel barriers and limited rest area locations will impact on the oncoming and following traffic on this section of the network.
3.	O'Connell Road & Tarana Road intersection - Strategic designs are to be provided for the proposed intersection widening. Pavements are to be designed to withstand frequent heavy vehicle loads per <i>Austroads Guide to Pavement Technology Part 2: Pavement Structural Design</i> and <i>Austroads Guide to Road Design Part 3: Road Geometry</i>. The hardstands and pavement are to be sealed to the standards of the adjacent road. See advisory notes for further information. - Measurements to verify the SISD in diagrams/photographs are to be provided for the O'Connell Road / Tarana Road intersection. - Provide mitigation measures to prevent right turn movements at the O'Connell Road & Tarana Road intersection, in order to not trigger the requirement for a BAR treatment upgrade. - The OSOM vehicle swept paths performed should be reassessed to confirm that the swept path movement can be reliably achieved with clearance from the edge of the pavement seal edge.
4.	Confirm whether pre-construction minor works and workforce accommodation camps are required or not.

Advisory notes

- 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.
- If pinch points have been identified within a revised assessment which require modification to the road and/or road infrastructure, the revised TIA is to provide strategic concept designs. These strategic concept designs must identify the scope of roadworks, pavement strengthening, or modifications to the state road infrastructure (e.g., roundabouts, medians, traffic islands, pedestrian refuges) for locations where high-risk OSOM swept paths indicate high-risk OSOM traversing the state road infrastructure or alternatively change vehicle configuration or routes to avoid traversing state road infrastructure. Further information on strategic concept design requirements can be found here: [Strategic design requirements for DAs](#).

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3. Consider the level of escort required for the high-risk OSOM. Police escort may be required for high-risk OSOM traversing multiple lanes, as demonstrated in the provided swept paths.
4. Consider the time frames to complete manoeuvres of pinch points or to travel through rural areas with narrow travel lanes and minimal overtaking opportunities. Traffic modelling may be required to understand the optimal timing for high-risk OSOM movements to occur.
5. Towns may have night-time restrictions on OSOM movements for consideration. This may impact pull over/rest area locations.
6. If the applicant proposes to use UGLRL-managed assets or infrastructure for OSOM/heavy vehicles, the applicant must lodge a request for a permit via the National Heavy Vehicle portal or send the request directly to UGLRL via “heavyvehicle@uglregionallinx.com.au”. The applicant must submit the request at least 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.
7. Consider potential flood impacts on railway corridors.
8. If the route requires movement along motorways in Sydney operated by private entities (for example, Transurban), consultation with motorway operators is required.

Figures

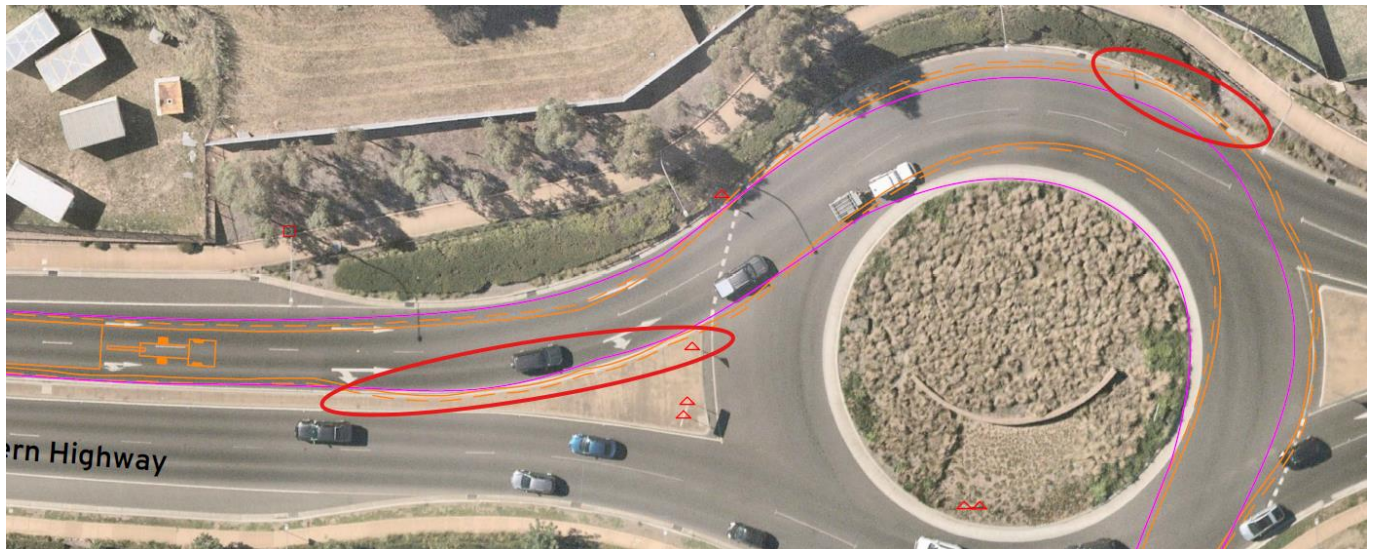


Figure 1: Vehicle chassis outline beyond paved road area / over median (indicated with red ovals) at Great Western Highway & Littlebourne Street roundabout. Source: Brewongle Solar Farm TIA (DWG NO: 781 RA01D)

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