

26 June 2025

TfNSW reference: REN25/00093/004

Your reference: (SSD-9619-Mod-1) PAE-85234707

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

Attention: Carl Dumpleton

SSD-9619-Mod-1, Tilbuster Solar Farm; Response to Mod 1 Development Footprint Update Response to Submissions

Dear Carl,

Transport for NSW (TfNSW) is responding to Tilbuster Solar Farm Mod 1 Response to Submissions, dated 22 May 2025 referred via the Major Projects Portal.

TfNSW has reviewed the following as key documents for preparing this response:

- Submissions Report prepared by NGH Pty Ltd, dated 22 May 2025
- Modification Report prepared by NGH Pty Ltd, dated 2 August 2024
- Updated Traffic Assessment prepared by Amber Organisation, dated 8 July 2024

The information provided in the Response to Submissions (RtS) does not adequately address all of TfNSW's previous request for information dated 11 November 2024, and TfNSW requests further information as a result of the review of Modification 1 and changes to the project scope.

TfNSW has provided a reconciliation table in **Attachment 1** and high-risk OSOM concept-level route analysis requirements in **Attachment 2**. The reconciliation table identifies the status of the additional information raised within TfNSW's responses to date, and outlines what information remains outstanding. It also includes a request for further details that TfNSW has raised as a result of the project modification.

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

TfNSW advises that the additional information requested (as detailed in the attachments) must be satisfactorily addressed in a revised TIA and EIS (where applicable) and resubmitted to TfNSW for formal comment prior to the determination of the modification.

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On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment 1** and **Attachment 2**. 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,

A handwritten signature in black ink that reads "Sarah Anderson".

Sarah Anderson

Manager of Development Services – West

Transport Planning

Planning, Integration and Passenger

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This attachment relates to TfNSW's response dated 26 June 2025 reference REN25/00093/004.

TfNSW has provided a table below that identifies the status of the additional information raised within TfNSW response to Modification 1, dated 11 November 2024, advising what information remains outstanding or further requested information that is raised about the project because of the project modification.

The advisory notes section is provided for references to any processes, policies, standards, weblinks, or general TfNSW information. It is intended to assist with addressing TfNSW's additional information request and provide further guidance for revising the TIA.

TfNSW comments and further information required

No.	TfNSW comments from Modification 1	TfNSW response to RTS
1.	Development Footprint Expansion TfNSW notes that the development footprint expansion will include access road widening and realignment to the relocated substation. Clarification is sought on where this increased construction footprint is and whether this will have any direct impacts on the New England Highway or road reserve. Noting that any changes to the width must not be contradictory to the approved strategic designs in Appendix 5 for the BAR/BAL and to Condition B5(b) of the Notice of Determination (NoD) dated 3 March 2022, which limits the sealed carriageway to 6.0m and 0.75m (unsealed) shoulders on both sides of the New England Highway.	Closed: TfNSW has no objections to the development footprint expansion, with the understanding that no changes are to be made near the New England Highway with the exception of the intersection treatment in accordance with Condition B4, B5 and Appendix 5 for the Development Consent.

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2.	Oversize Overmass (OSOM) vehicle definition TfNSW have no concern with the proposed definition change in the Notice of Determination (NoD) to reflect heavy vehicle/s requiring escort as defined by the National Heavy Vehicle Regulator (NHVR) NSW Class 1 Carrying Vehicle Operator's Guide. A breakdown of the expected number and vehicle configurations of all heavy vehicles, OSOM vehicles and high risk OSOM vehicles is required to demonstrate that despite the change in definition, each vehicle type is still accounted for and compliant with the restrictions of the permissible traffic volumes as per Condition B1 in the NoD dated 3 March 2022.	Closed: TfNSW has no objections to the proposed definition change from "Oversize Overmass" to "heavy vehicles requiring escort". It is understood that there is to be one heavy vehicle requiring escort for Tilbuster Solar Farm, specifically the transformer delivery vehicle.
3.	Extension to weekend construction hours TfNSW notes that the Saturday construction work hours have been extended by 5 hours and an additional workday (Sunday) from 8am to 6pm has been added. Updated traffic volumes will need to be provided for the additional construction day and hours, together with a comparison with the original traffic volumes. This is required to demonstrate that the additional traffic volumes do not change the outcome of the original turn warrant assessment.	Open: The Submissions Report states that "recent traffic surveys" and a "revised assessment" have been conducted. TfNSW requests a copy of the revised assessments and traffic surveys as assurance.

4.	Port of Newcastle haulage route origin TfNSW have no concern with the addition of the Port of Newcastle as an origin destination for the haulage route for all oversize/overmass vehicles (OSOM), if evidence is provided to TfNSW that all OSOM with the laden dimensions and weights (load plus vehicle combinations) conform with the restrictions and limitations identified within the NHVR NSW Class 1 Load Carrying Vehicle Operator’s Guide. If the laden dimensions of the OSOM do not conform with the NHVR NSW Class 1 Load Carrying Vehicle Operator’s Guide and if one of the dimensions or weights fall for the OSOM are classed as high risk OSOM (as defined by the TfNSW website), then a concept route analysis will be required to be provided to TfNSW for review as a part of the response to submissions.	Open: TfNSW requires a concept level route assessment for the movement of the heavy vehicle requiring escort along the Port of Newcastle route. This route assessment is to include the swept path assessments mentioned in the Submissions Report, as well as the information requested in Attachment 2.
5.	Construction period changes TfNSW notes that the construction period has changed from 12 months to 24 months and will now be staged as follows: 6 months for the access road, 12 months for the solar farm and 6 months for commissioning. The associated traffic impacts from the additional construction period will need to be accounted for. This should include, but is not limited to, a breakdown of the updated peak construction period for each stage, workforce numbers, light and heavy vehicle volumes during the AM/PM network and comparison for project peak, reassessment of the cumulative impacts from other SSD developments, and updates to the turn warrant assessment. Any mitigation measures for additional impacts are required. Where there are any changes from the original traffic impact a comparison table is required.	Open: The Submissions Report states that “recent traffic surveys” and a “revised assessment” have been conducted. TfNSW requests a copy of the revised assessments and traffic surveys as assurance.

Advisory notes

1. Strategic Concept Designs must be provided for any works required along the state road network route. [Strategic-Design-requirements-for-DA-Factsheet.pdf](#).
2. 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.

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Concept Level Route Analysis required for High Risk OSOM

1. The route assessment is required for [high risk OSOM \(as defined on TfNSW website\)](#) / heavy vehicles requiring escort 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 high risk OSOM movements required for the project.
 - b. The high-risk OSOM laden loads, class and vehicle configuration must include the following information regarding the dimensions, weight and length:
 - a. NHVR route ID,
 - b. Overall dimensions (width, height and length) of the laden load (laden load is the vehicle combination and the load to be transported),
 - c. Total weight of laden load,
 - d. GSM,
 - e. Payload,
 - f. deck height,
 - g. axle configuration,
 - h. axle spacing, including from the prime mover, and
 - i. axle masses (including split axle and group axle masses).
 - b. The TIA is required to include details of all high risk OSOM loads and vehicle configurations for the project.
 - c. The location of pull-over bays / rest areas along high risk OSOM routes (including GPS coordinates) and demonstrate through swept paths that high risk OSOMs can be physically accommodated for the project (in terms of size, width and accessibility).
 - d. 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 request a bridge assessment of TfNSW assets.
 - e. The design vehicle templates used in the swept path analysis software are also requested in order for TfNSW to review the performance within the software (e.g. Autodesk Vehicle Tracking or Transoft AutoTURN) or alternatively include within the swept paths the wheel track, body of the OSOM component, offset, the start and completion of the movement around to manoeuvre a pinch point, the speed, steering arrangement and demonstrate compliance with *Austrroads Design Vehicles and Turning Path Templates*.
 - f. Highlighting each at-risk road structures that the haulage route crosses including bridges, traffic signals, medians, pedestrian refugees, signage, major culverts, and minor culverts that

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may not meet the desirable cover to cater for proposed axle loads or could be impacted by the high-risk OSOM movements.

- g. Traffic mitigation measures or road works, modifications, or road upgrades to facilitate the movement of the high risk OSOM(s) associated with the project.
- h. 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).
- i. Include any surveys or pavement investigations as part of the high-risk route analysis.
- j. Identify and assess implications of any road and rail projects under construction during the indicative schedule for project related OSOM movements.
- k. Identify any rail level crossing along the route.
- l. 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.

Note: Narrow travel lanes, minimal existing overtaking lanes or pull over bays, high proportion of background traffic or heavy vehicles and constrained road geometry may warrant the requirement for additional pull over or rest area locations to manage the impacts to through traffic.

- m. 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 of 5.25m.
- n. Where the EnergyCo P2R road upgrades are relied on to facilitate the project's high-risk OSOM movements, the pavement extents, scope of work, and bridge assessments for the P2R project are to be reviewed and assessed concerning the project's proposed high-risk OSOM vehicle configuration and loads, to confirm that the loads will be able to move within the design envelope that this project will deliver. Evidence of the consistency check with the EnergyCo P2R project is to form part of the high-risk route assessment.