

1 August 2025

TfNSW reference: REN25/00108/002

Your reference: SSD-8911 (PAE-87001209)

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Attention: Kirsty Vogel

SSD-8911, Sundown Solar Farm, Sturmans Road, Spring Mountain NSW 2360; Response to Response to Submissions (RTS)

Dear Kirsty,

Transport for NSW (TfNSW) is responding to the Sundown Solar Farm Response to Submissions, referred on 30 June 2025 via the Major Projects Portal.

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

- Sundown Solar Farm Submissions Report, prepared by EMM Consulting Pty Ltd, dated 13 June 2025
- Appendix C: Updated Mitigation Measured Table, prepared by EMM Consulting Pty Ltd, undated
- Appendix F: Over-size Over-mass Assessment, prepared by EMM Consulting Pty Ltd, dated 13 June 2025
- Appendix G: Access Road Options Assessment, prepared by EMM Consulting Pty Ltd, dated 9 November 2023
- Appendix H: Revised Gwydir Highway Spring Mountain Road Intersection (Rev 7), prepared by EMM Consulting Pty Ltd, dated 22 October 2024
- Appendix I: Interim Constriction Traffic Management Plan, prepared by EMM Consulting Pty Ltd, dated 30 May 2025
- Appendix J: Traffic Count Data, prepared by EMM Consulting Pty Ltd, dated 3 June 2021

The information provided in the Response to Submissions (RtS) does not adequately address all of TfNSW's previously requested information. TfNSW requests that the remaining additional information be addressed (refer to **Attachment 1**) prior to the provision of formal advice from TfNSW for this project.

TfNSW has provided a reconciliation table within **Attachment 1** that identifies the status of the additional information raised within the previous TfNSW Response to Environmental Impact Statement (EIS), dated 4 August 2024, and advises what information remains outstanding. **Attachment 2** includes a request for further information that is raised by TfNSW as a result of the updates in the Submissions Report.

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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 advises that the additional information requested below must be satisfactorily addressed in a revised TIA and EIS and resubmitted to TfNSW for review via the Major Projects Portal, preferably before determination. TfNSW requests that the revised TIA include tracked changes and a reconciliation table to identify where the changes to the TIA have been made.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachments 1 and 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, appearing to be "Nathan Boscaro", followed by a vertical yellow line.

Nathan Boscaro

Manager Development Services - West

Transport Planning

Planning, Integration and Passenger

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Attachment 1

SSD-8911, Sundown Solar Farm, Sturmans Road, Spring Mountain NSW 2360; Response to Response to Submissions (RTS)

This attachment relates to TfNSW's response dated 1 August 2025 reference REN25/00108/002.

TfNSW has provided a table below that identifies the status of the additional information raised within TfNSW Response to Environmental Impact Statement (EIS), dated 4 August 2024, and advises what information remains outstanding.

TfNSW comments and further information required

No.	TfNSW comments from EIS requiring RFI	TfNSW response to RTS, and request for further information for revised TIA
OPEN / PARTIALLY CLOSED		
3.	Section 4 of the TIA states Sundown Solar is in consultation with the White Rock Wind Farm regarding potential cost sharing of the upgrade of the Gwydir Highway/Spring Mountain Road intersection. Consultation details and information regarding proposed construction timeframes are required to understand and assess the cumulative traffic impacts at the AM/PM peak during peak construction. The revision of the TIA to include the cumulative traffic impacts of both developments is pertinent to understanding the full scope of works at the Spring Mountain Road/Gwydir Highway intersection.	Partially closed: Please provide a log of when communications between Sundown Solar Farm and White Rock Wind Farm have occurred to understand the recency of the provided information. It is understood that Sundown Solar Farm will construct the Gwydir Highway/Spring Mountain Road intersection upgrade. Note that if the timing of the completion of the road upgrades does not align or the scope of the road upgrades changes, Sundown Solar Farm would require further environmental approval and complete the requisite road upgrades before commencing construction.
4.	Section 5 of the TIA suggests that construction workforce will generate up to 100 light vehicle trips and 14 shuttle bus trips per day. The TIA needs to be updated with the following information: a. Provide enforceable measures/strategies /protocols to ensure full compliance with the TIA, maximum light and heavy vehicles for peak construction (100 light vehicle trips and 14 shuttle bus trips per day). As a part of addressing this specify who is	a. Open: The interim CTMP states that the “site superintendent/delegate” is responsible for enforcement, but the Submissions Report states the “construction contractor” as the responsible party. Further clarification is required. Include measures to record daily vehicle movements within the CTMP.

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	responsible for enforcement, how the measures will be enforced, what methods will be provided to monitor compliance, procedure for breaches in compliance and specify procedure for reviews of the implemented protocols and procedures. b. Clarification of the shuttle bus size. c. Identify the locations for the accommodation pick up and drop off points for the shuttle bus service. d. Identify if the shuttle buses will be located at the project area during the day or return to another location outside of the AM/PM peak hours, the traffic assessment needs to be updated with any additional associated trips. Specify how the commitment to the use of shuttle buses and to the maximum light vehicle numbers identified within the TIA will be achieved.	b. Open: Clarify whether the shuttle bus will be 25- or 50-seater vehicles. c. Closed: Proposed stops and routes for the shuttle bus service have been provided, pending consultation with Councils. d. Open: Request for Information has not been addressed. e. Open: Request for Information has not been addressed.
5.	Section 5 of the TIA identifies that OSOM vehicles will be required during construction to transport the transformer. Swept path analysis is required demonstrating the largest design vehicle entering and exiting the development, and moving in each direction through intersections along the proposed OSOM transport route/s. The route analysis is to include at a minimum the following: a. The design vehicle templates used with 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). b. Identify pullover, layby and emergency breakdown locations from the nominated Port to the project access. c. Highlighting each at-risk road structures that the haulage route crosses including bridges, traffic signals, signage, railway lines, major culverts, and minor culverts that may not meet the desirable cover to cater for proposed axle loads.	a. Closed: OSOM vehicle configuration as used in swept path provided in Figure 2.2 of Appendix F. b. Partially closed: Potential pullover bay locations have been provided with dimensions. Swept path analysis of pullover bays are to be included within the revised TIA to ensure OSOM can be sufficiently accommodated. c. Partially closed: Some at risk-road structures have been highlighted in swept paths within Appendix F. However, see Appendix 2 of this response for further comments on the high-risk OSOM assessment. d. Partially closed: Section 2 of Appendix F outlines OSOM vehicle details. Axle loads and axle group loads have not been provided in Equivalent Standard Axles.

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	d. Identify and provide the following measurements parameters of the OSOM components / materials to be moved: • Identify all the types of OSOM vehicles proposed to be used for the project. • Overall combination load length, width, height and mass • Maximum component length, widths and heights • Wheelbase dimensions, • Maximum trailer articulation angle(s), • Minimum overhang heights above the road surface, • Axle loads and axle group loads in terms of both tonnes and Equivalent Standard Axles (refer to Austroads Guide to Pavement Technology). e. Strategic designs are required for any identified road works required along the classified road network based on the outcome of the above route assessment. It should be noted that NHVR permits do not cover the civil works required along any proposed OSOM route. Any works required along the OSOM route must be considered within the scope of works for the SSD to ensure that the development is constructable.	e. Open: Strategic designs have not been provided for identified road works along the state road network.
6.	Table 4.3 of the TIA suggests the property access opposite Spring Mountain Road has been closed and moved approx. 50m to the west, Google Maps still shows the access opposite Spring Mountain Road. Evidence of the relocation and closure is required, any existing property access within the intersection upgrade footprint needs to be shown within the design.	Partially closed: Please provide evidence of closed access, either written confirmation from the occupants or photographic proof.

8.	There is an existing school bus stop located at the Gwydir Highway/Spring Mountain Road intersection (with no signage or infrastructure). The proposed bus stop facilities need to be shown within the plans considering safety and further information detailing the proposed measures to prevent conflict with vehicles travelling through the intersection is needed.	Partially closed: Appendix H DRG EMM-C05 indicates that school bus signs are to be installed. However, strategic concept designs are to be provided for the pedestrian refuge area to be relocated at 3081 Gwydir Highway. Confirm if the painted medians in DRG EMM-C05 are for the pedestrian refuge islands mentioned in Section 12 of the interim CTMP.
9.	The fingerboard sign on the eastbound approach to the intersection on the Gwydir Highway should be replaced by an Advance Intersection Warning Sign, the plans need to be updated to demonstrate this.	Open: Appendix H DRG EMM-C05 indicates that the existing fingerboard sign is to be replaced with an Advance Intersection Warning Sign. However, the Submissions Report states that the fingerboard will be retained, and an Advance Warning Sign is to be installed 80 – 100m west of the intersection. Clarification is required.
10.	Appendix B includes a 2D layout over an aerial image. A strategic design is required which must be to scale and include, but not be limited to details on, legal property boundaries including the existing road reserve boundaries, existing and proposed ground levels, existing and proposed lane configurations, existing and proposed lane widths, new lane lengths, typical cross sections, conceptual drainage details (for any changes required), proposed signage, impacts to utilities &/or signage etc.	Partially closed: Proposed drainage details have not been provided. Further comments on strategic design are included in Appendix 2 of this response.

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CLOSED

1.	The Traffic Impact Assessment (TIA) proposes to use the Spring Mountain Road/Gwydir Highway intersection as a construction route for light and heavy vehicles. Section 6.2 of the TIA shows that safe intersection sight distance (SISD) at this intersection does not comply with Austroads Guide to Road Design (AGRD) Part 4A – Table 3.2. TfNSW does not support intensifying traffic at an intersection without compliant SISD. Note: Scaled plans and longitudinal section are required to demonstrate that sight distance is available at any proposed access point (refer to Table 3.2 of Austroads Guide to Road Design Part 4A) that intersects with a classified road. The plan must demonstrate any landscaping and/or fencing, will not compromise sight distance and measures including any necessary civil works to achieve compliant SISD. Section 6.2 of the TIA suggests the use of temporary reduction of the posted speed on Gwydir Highway to achieve SISD requirements. TfNSW does not support temporary reduction of the posted speed to achieve compliant SISD. This would cause delay to vehicles using this stretch of road and cause confusion to drivers. This is supported by the NSW Speed Zoning Guidelines (2011) which specifies temporary reduction in the posted speed zone is not supported to service private developments.	Closed: Appendix H presents revised intersection complying design with Austroads Guide to Road Design Part 4A, with 300m SISD. The stop line has been changed to a give way line and has been moved 1 m further from the C1 in comparison to the original design. It is understood that with the redesign, there will be no requirement for a temporary speed reduction.
2.	Section 3.6.3 of the TIA suggests a traffic survey was completed in June 2021 at the Gwydir Highway/Spring Mountain Road intersection to determine the peak hours. A full breakdown of traffic counts is required to clearly demonstrate the peak periods.	Closed: Traffic count data has been provided in Appendix J.

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7.	Spring Mountain Road is unsealed at the intersection with Gwydir Highway which provides a safety risk, this must be sealed a minimum of 10m back from the edge of seal to prevent loose gravel tracking onto the highway. The plans need to be updated to demonstrate this.	Closed: Revised design in Appendix H shows sealed road is to be continued to approximately 50m from the intersection.
11.	TfNSW is the rail authority of the Country Rail Network (CRN) across NSW and the Transport Asset Holding Entity (TAHE) is a State – owned corporation that holds rail property assets and rail infrastructure, including the CRN. As of 29 January 2022, UGL Regional Linx (UGLRL) has been appointed by TfNSW to operate and manage the CRN to ensure any potential impacts to rail corridors are considered and addressed. The TIA needs to be updated considering the following: • The Environmental Impact Statement (EIS), Table 3.3 provides indicative construction haulage routes, however the TIA or EIS do not indicate or provide any information on where the proposed haulage routes cross both Biniguy to Inverell and Glenn Innes to Wallangarra CRN rail corridors. The proposal must ensure the safety of the rail corridor and rail infrastructure. The TIA needs to be updated to include all railway crossing locations of CRN corridors on the proposed routes. If non-CRN corridors are affected by the haulage routes, the appropriate rail manager should be notified.	Closed: If the applicant intends to use UGLRL-managed assets or infrastructure for OSOM/heavy vehicles, including crossings, for OSOM or heavy vehicle movements, a permit request must be submitted either via the National Heavy Vehicle Regulator (NHVR) portal or directly to UGLRL at heavyvehicle@uglregionallinx.com.au. The request must be lodged at least two (2) months prior to the intended passage and must include detailed specifications of the OSOM or heavy vehicles, including axle loadings, axle spacings, and overall vehicle dimensions.

Attachment 2

SSD-8911, Sundown Solar Farm, Sturmans Road, Spring Mountain NSW 2360; Response to Response to Submissions (RTS)

This attachment relates to TfNSW's response dated 1 August 2025 reference REN25/00108/002.

TfNSW has provided a table below that advises further requested information that is raised by TfNSW about the project as a result of the updates in the Submissions Report.

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.

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.
3. EnergyCo is currently developing its Port to Renewable Energy Zone (REZ) strategy for the New England REZ, including potential haulage routes for OSOM (and other construction and operational) movements, and funding and delivery arrangements. Until this strategy is complete, EnergyCo is not able to commit to any specific road upgrades in the New England REZ at this point. If the proponent wishes to proceed with the submission of its EIS for Sundown Solar Farm ahead of this strategy and necessary approvals being finalised, EnergyCo recommends that the proponent determines its own transport route for the project and secures all relevant approvals. EnergyCo will continue to keep generators and regulators informed on the status of the Port to REZ strategy, but is currently unable to provide any commitment regarding the timing or scope of road upgrades that may be delivered under future funding allocations.

TfNSW comments and further information required

No.	TfNSW comments and further information required
1.	Appendix F: OSOM Assessment a. TfNSW will not support high-risk OSOM traversing state road infrastructure (medians, roundabouts, traffic islands, footpaths, etc.) due to the risk of damage to this infrastructure. The revised TIA is to provide strategic concept designs that identify the scope of roadworks, pavement strengthening, temporary hardstands, or modifications to the state road infrastructure (e.g., roundabouts, medians, traffic islands, pedestrian refuges) for

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locations where high-risk OSOM swept paths indicate high-risk OSOM traversing the state road infrastructure.

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.

- b. Consider police escort for contraflow movements.
- c. Temporary traffic signal removal:
 - i. The traffic signal at Selwyn St/George St/Industrial Drive, Mayfield East has already been removed. Plans and swept paths are to be updated, and should note changes in the median.
 - ii. The Port to Central-West Orana REZ project includes removal of traffic signals at Industrial Drive /Pacific Highway, Mayfield West. The proponent is to confer with EnergyCo about the scope of the works.
 - iii. The revised TIA is to advise how long the traffic signals at Lou Swan Way/Alice Street/Gwydir Highway are to be removed for. TfNSW is to be engaged for onsite works. If removal is to exceed 24 hours, a staging design must be provided for approval by TfNSW.
- d. There are multiple instances of swept paths showing the wheel path traversing outside of the paved road area, including, but not limited to, Newell Highway/Boothenda Road/Troy Bridge Road at Dubbo (Figure 1), and Putty Road/Mount Thorley Road/Jerrys Plains Road at Mount Thorley (Figure 2).

 These examples are shown in Figures 1 and 2 of Attachment 2 of this response for ease of understanding. Note that these are some examples, and there may be more instances across the OSOM route. It is the proponent's responsibility to ensure that all vehicle movements are to be on sealed pavement.

 Strategic concept designs are to be updated/provided with road and/or shoulder widening pavement design. See advisory notes for more information.
- e. Bettington Street/Vennacher Street, Merriwa, NSW

 Strategic concept design is required for the removal of refuge islands. Consider the pedestrian safety impacts from removal of refuge medians around the pedestrian crossing.
- f. Evidence of consultation with Councils regarding removal of parking spaces, refuge islands, etc. "subject to consultation with Council" is to be provided within the revised TIA.

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2.	Appendix H: Intersection Design- Spring Mountain Road/Gwydir Highway- requested revisions The strategic concept designs for the Spring Mountain Road/Gwydir Highway are to be revised to address points a) to e). a. Ensure all notes are updated to reflect TfNSW guidelines, from the antiquated RMS guidelines. b. DWG EMM-C05: i. Line marking type shown (e.g. C1 Line) does not comply with the revised TfNSW technical directive TS 05462. Notation is to be updated to suit this standard. ii. A bus stopped in WB bus bay may encroach the intersection approach lane of Spring Mountain Road. Provide swept paths of buses to demonstrate appropriate space. iii. Interface string is missing which makes it difficult to determine the designs proposed footprint. Include in the revised TIA. c. DWG EMM-C06 i. Interface string is missing which makes it difficult to determine the designs proposed footprint. Include in the revised TIA. ii. Clarify the pavement treatment for the proposed widening of the Gwydir Highway. d. DWG EMM-C07 i. No vertical curves are designed on any of the profiles. Include in the revised TIA. ii. Vertical profile missing for the mainline of the Gwydir Highway. Include in the revised TIA. e. DWGs EMM-C08 to EMM-CO11 i. Crossfall data and design data are missing on several cross sections. Include in the revised TIA. ii. String naming conventions for the Gwydir Highway cross sections do not match TfNSW specifications. iii. Barrier is missing in cross sections. iv. It is recommended to assess the risk of the large trees at the eastern end of the works at the toe of the high embankment to confirm if a barrier is required.
3.	Project schedule Provide an updated estimate for the key project dates as stated in Section 2.7 of the Sundown Solar Farm TIA dated December 2022. A growth rate is to be applied to the background traffic data and turn warrant assessments.

Figures

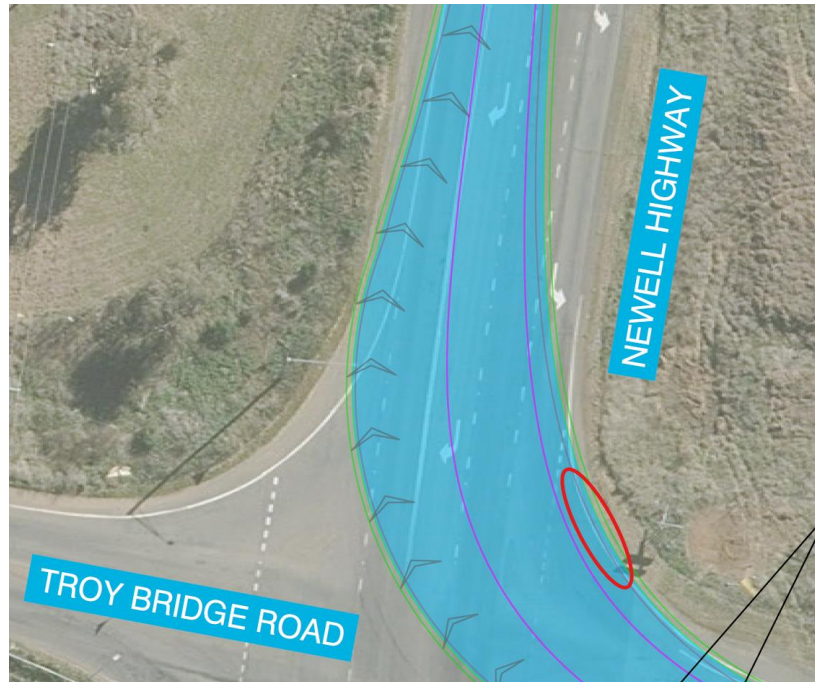


Figure 1: Vehicle chassis outline beyond paved road area (indicated with red oval) at Newell Highway/Boothenda Road/Troy Bridge Road, Dubbo. Source: OSOM Assessment DRG EMM-020.

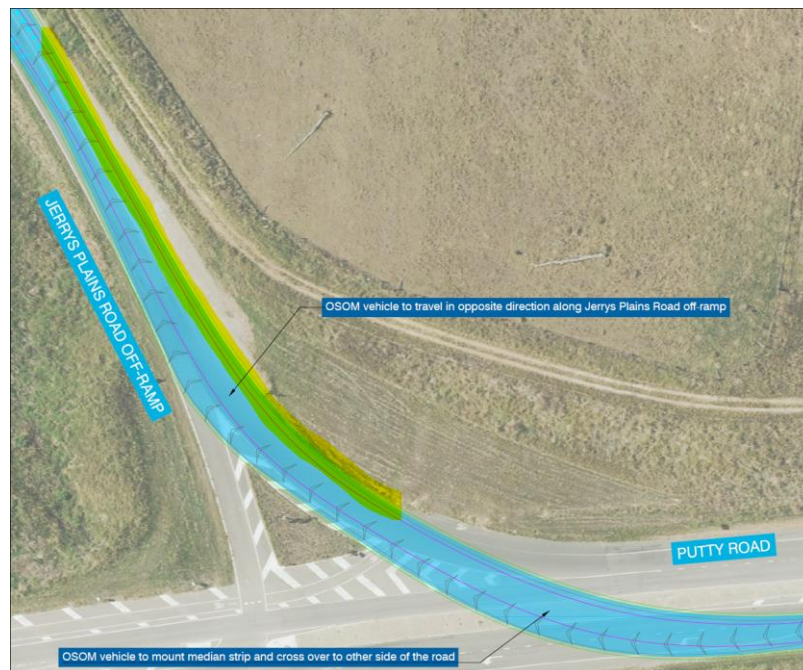


Figure 2: Vehicle chassis outline beyond paved road area (indicated with highlight) at Putty Road/Mount Thorley Road/Jerry's Plains Road, Mount Thorley. Source: OSOM Assessment DRG EMM-009.

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