

14 August 2025

TfNSW reference: REN25/00075/002

Your reference: SSD-48225958

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

**Attention: Cameron Ashe**

**SSD-48225958 – Gundry Solar Farm – Response to Submissions - Goulburn Council**

Dear Cameron,

Transport for NSW (TfNSW) is responding to the Gundry 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 The Transport Planning Partnership dated 17 June 2025, as key documents for preparing this response.

Key issues raised in TfNSW's response (dated 11 December 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** and **Attachment 2**.

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 project complies with Austroads and mitigates 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** and **Attachment 2**. 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,



**Nathan Boscaro**  
Manager Development Services - West  
Transport Planning  
Planning, Integration and Passenger

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**SSD-48225958 – Gundry Solar Farm – Response to Submissions - Goulburn Council**

This attachment relates to TfNSW’s response dated 8 August 2025 reference REN25/00075/002

**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.

No.	TfNSW comments from EIS requiring RFI	TfNSW response in relation to RTS and request for further information for revised TIA
	<p><b>Key Issue 1: Concept Level Route Analysis required for High Risk OSOM</b></p> <p>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:</p> <p>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.</p> <p>b) Overall combination type, configuration, load and vehicle configuration.</p> <p>c) The laden dimensions and weight of the vehicle configuration and loads.</p> <p>d) The TIA is required to include details of all high-risk OSOM loads</p>	<p>OPEN - Route Analysis provided optioning Port Kembla and Port Botany. Refer to comments below within 1 f, h, and i for specific actions that are required to be addressed for the Port Kembla and Port Botany routes</p> <p>a - CLOSED</p> <p>b - CLOSED</p> <p>c - CLOSED</p> <p>d - CLOSED – Transformer laden configuration has been provided within the revised TIA.</p>

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<p>and vehicle configurations for the project.</p> <p>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.</p> <p>f) Bridge Assessments for any at risk bridges on classified roads due to dimensions and weight of OSOM vehicles. Contact <a href="mailto:spu@transport.nsw.gov.au">spu@transport.nsw.gov.au</a> to apply for a bridge and culvert assessment review of TfNSW assets.</p> <p>g) Swept path analysis for the largest and longest high-risk OSOM navigating each pinch point or intersection along the state road network.</p> <p>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.</p>	<p>e – CLOSED – Post consent requirement to identify pullover bay locations with suitable swept paths to ensure suitable locations for fatigue management.</p> <p>f – OPEN – Bridge assessments still have not been provided. For TfNSW assets these can be provided by SPU. See advisory note.</p> <p>g - CLOSED – Swept paths provided</p> <p>h – OPEN – The Port Kembla Route incorrectly identifies the height restriction at the University Bridge. This is posted as 4.9metres on the bridge however the route study notes this as a 5.2m clearance, see Attachment 2. The proponent is to ensure that the vehicle will pass safely. If required investigation of lowering for the movement is to undertaken. The proponent will also need to ensure bridge assessments are completed for the route.</p> <p>The Port Botany route includes a number of bridges that assessments have not been provided. The proponent is also to provide a full assessment of clearance issues along the route to ensure there are no discrepancies as identified above.</p>
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<p>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).</p>	<p>Once complete, the proponent is to revise their routes to ensure they have accounted for updated assessment and completed bridge assessments.</p> <p>i – OPEN – The provided swept paths demonstrate the following road structures will be impacted:</p> <p><u>Botany Route</u></p> <p>Median on Botany road being crossed to make turn into Bumborah Point Rd</p> <p>Median at the corner of Bunnerong Rd and Botany Rd/ on Bunnerong Road</p> <p>Median on Kent Road being crossed to make turn.</p> <p>Median at Corner of Braidwood and Bungonia</p> <p><u>Kembla Route</u></p> <p>Median and Corner of M1 and Picton Road</p> <p>Median at Corner of Braidwood and Sloane</p> <p>Median at Corner of Braidwood and Bungonia</p> <p>TfNSW will not support high-risk OSOM traversing state road infrastructure (medians, roundabouts, traffic islands etc) due to the risk of damage to this infrastructure.</p> <p>The revised TIA is to provide alternative swept paths with differing vehicle configuration or 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.</p> <p>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.</p>
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<p>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).</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>(See Attachment 2)</p> <p>j - CLOSED - TMP is detail this information.</p> <p>k - CLOSED - The following rail comments are provided for consideration:                  If the applicant intends to use UGLRL-managed assets or infrastructure, including crossings, for OSOM or heavy vehicle movements, a permit request must be submitted either via the <b>National Heavy Vehicle Regulator (NHVR)</b> portal or directly to UGLRL at <a href="mailto:heavyvehicle@uglregionallinx.com.au">heavyvehicle@uglregionallinx.com.au</a>. 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.                  It is advised that the proposed transport routes would cross the rail corridors managed by Agencies other than TfNSW. It is recommended that the DPHE refer this application to other relevant agencies (e.g., ARTC &amp; Sydney Trains).</p> <p>l - CLOSED - Contact with current road projects along the route and analysis of their impact, for example the Mt Ousley bypass work at Wollongong will need to occur prior to movements within the TMP.</p> <p>m - CLOSED</p>
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	<p>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.</p> <p>Notes:</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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 imposed. In this regard, it is recommended you engage earlier with TfNSW's Development Services Renewables team to discuss requirements of the route assessment.</i></p>	
2	<p><b>Key Issue 2: Traffic Generation and distribution</b></p> <p>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.</p> <p>b) Table 5.2 of the TIA show hourly construction traffic, which includes</p>	<p>a – PARTIALLY ADDRESSED - Proponent is to clearly label raw data for the intersection of Braidwood / Bungonia and Braidwood / Sloane in the appendix.</p> <p>b – OPEN – Table 5.2 has not been updated to demonstrate the hourly traffic.</p>

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<p>63 light vehicles outbound at midday (12-1pm) and only 32 light outbound in PM peak hour (3-4pm).</p> <p>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 from to the site, and if it is all accessing from Goulburn.</p> <p>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.</p> <p>e) Background traffic growth is to be applied to the existing traffic count to the year of peak construction.</p>	<p>c – OPEN – Turning volumes provided in the appendix however the volumes of the growth rate applied background traffic and the Gundry Solar Farm traffic have not been plotted.</p> <p>Further to this point, two routes are currently identified within Goulburn to accommodate the project construction traffic, within s3.1-Road network within the TIA prepared by TTPP (dated 17 June 2025), both routes will use Sloane Street, Braidwood Road, Bungoria Road, however, it isn't clear how the traffic will be distributed at each of these intersections based on the chosen route (i.e. will all traffic turn left or right at these intersections or be evenly distributed) if both routes are used for project traffic. TfNSW requests that the revised TIA include the direction and distribution of project traffic that will use each route in the AM/PM peak hours at the intersections with the state road network. The traffic and SIDRA analysis is to be revised based on the confirmed traffic distribution for each route in the AM/PM peak hour.</p> <p>d - OPEN – SIDRA outputs have been provided however there appears to be discrepancies in the output provided. The 2027 Base SIDRA analysis for Braidwood Road South East indicates a Level of Service of Service of F, however the 2027 Base plus Gundry Solar Farm South East Braidwood Rd indicates a Level of Service of B.</p> <p>The proponent is to clarify this discrepancy and ensure that the data for all intersections is correct and mitigation measures reflect the outcomes of the analysis. <b><u>Please provide the electronic SIDRA files in the response to TfNSW.</u></b></p> <p>e – CLOSED - A growth rate of 2% per annum has been applied to the surveyed 2023 data. The proponent is to ensure the analysis provided considers a worse case scenario of the network background AM and PM peaks occurring at the</p>
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	f) Show the project traffic added to each intersection that has been analysed in the TIA.	<p>same time as the Gundry construction project data. Proponent is to consider offsetting start times as a mitigation measure to reducing impacts to the urban roads around Goulburn</p> <p>f- OPEN – Proponent is to confirm and clearly label the raw traffic data for the intersection of Bungonia / Braidwood and Braidwood / Sloane Street that has been used in the intersection analysis.</p>
3.	<p>The origin, destination and routes are to be shown for:</p> <p>a) Employee and contractor light traffic.                  b) Shuttle buses.                  c) Heavy vehicle traffic.                  d) OSOM vehicle traffic.                  e) OSOM high risk loads.</p>	<p>PARTIALLY ADDRESSED – <b><u>Pending electronic SIDRA files being provided:</u></b> TfNSW notes that turning volumes and routes for light vehicles/heavy vehicles/shuttle buses should be focused to reduce the impact on the state road network, particularly on the intersections of Braidwood / Sloane Street and along Braidwood Road.</p>
3.	<p>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.</p>	<p>CLOSED</p>
4.	<p>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.</p>	<p>CLOSED -</p>
5.	<p>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.</p>	<p>CLOSED– The updated TIA will need to specify the routes for shuttle buses to the development considering the impacts on turning movements raised in the points above on the level of service of Sloane / Braidwood and Braidwood Road.</p> <p>The updated TIA is to include mitigation measures to reduce the impacts on Braidwood Road and the intersection of Sloane Street/Braidwood Road. Examples of mitigation measures could be avoiding the network peak hour for project traffic movements, increasing carpooling and shuttle bus</p>

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		participation or staggering project traffic movements.
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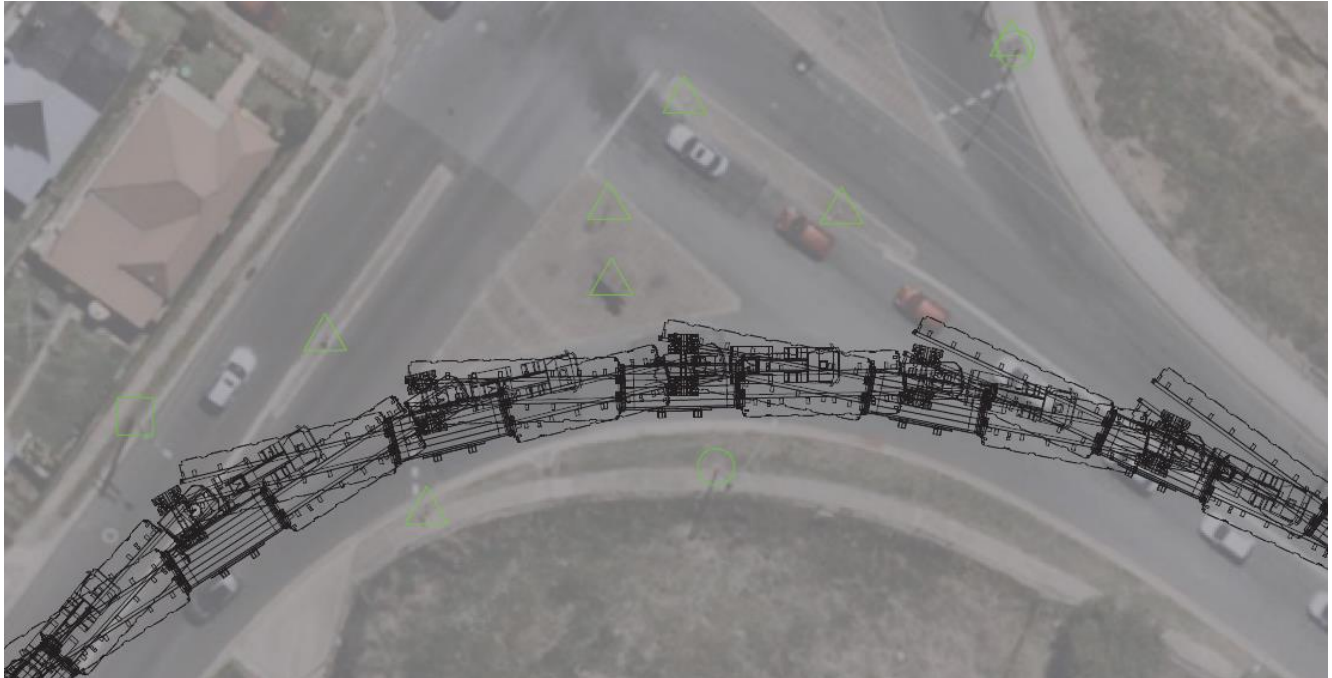
**TfNSW Advisory Notes**

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. 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](#)

Attachment 2

This attachment relates to TfNSW's response dated 8 August 2025 reference REN25/00075/002



Corner of Braidwood and Sloane



Corner of M1 and Picton Road

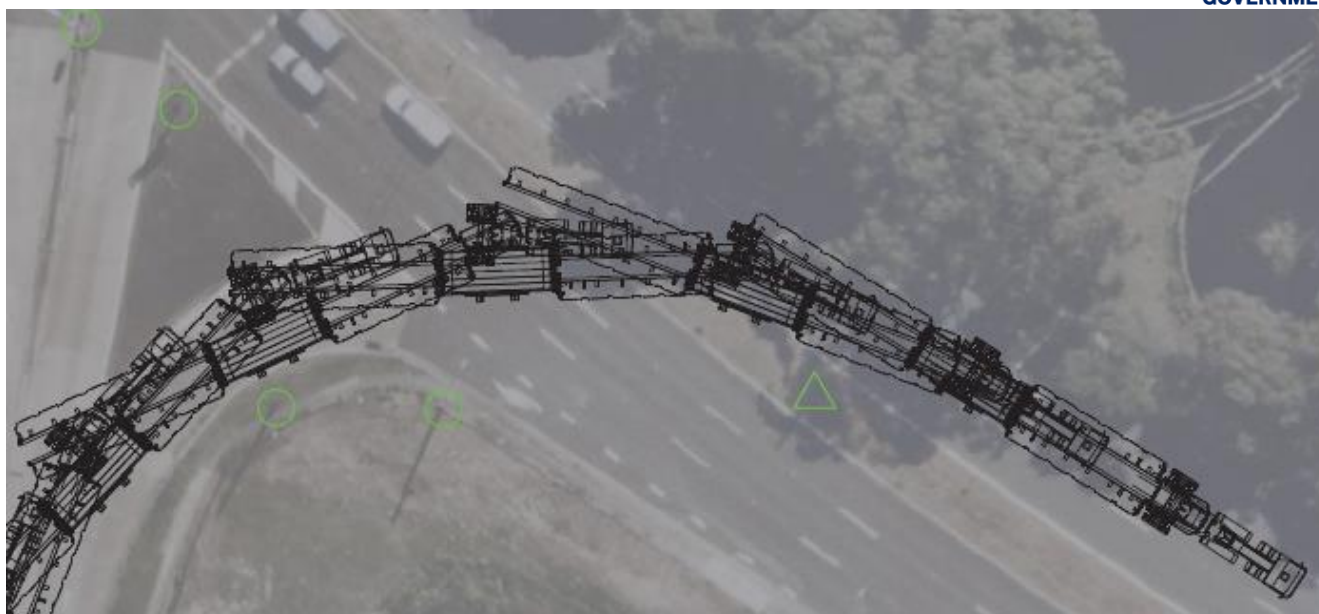


Corner of Bungonia and Braidwood

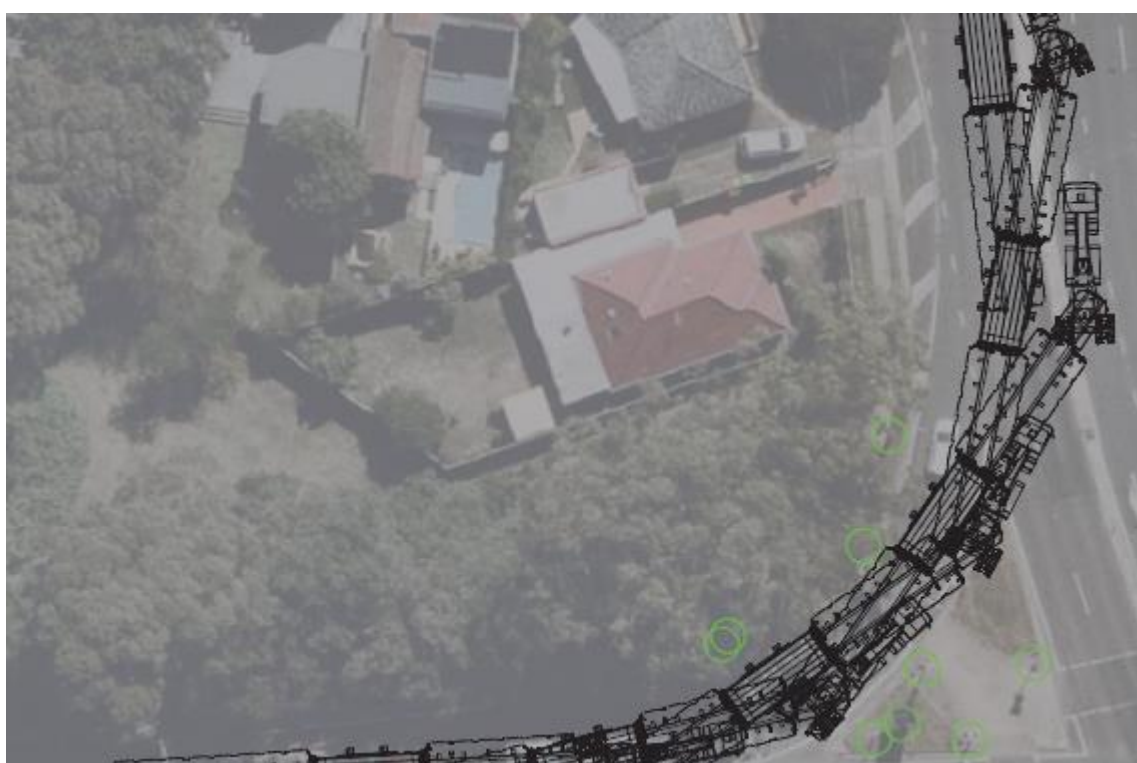


University Avenue Bridge, Wollongong

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Median at Botany Road / Bumborah Point Road



Median on Bunnerong Road

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Median on Kent Road

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