

8 October 2025

TfNSW reference: REN25/00151/002

Your reference: SSD-29508870-Mod-1 (PAE-90815223)

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Attention: Cameron Ashe

**SSD-29508870-Mod-1, Birriwa Solar Farm, Barneys Reef Rd, Birriwa; Response to Modification 1**

Dear Cameron,

Transport for NSW (TfNSW) is responding to the Birriwa Solar Farm - Modification 1, referred via the Major Projects Portal on 14 August 2025.

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

- Modification Report prepared by EMM Consulting Pty Ltd, dated 11 July 2025; and
- Traffic Impact Assessment (TIA) prepared by EMM Consulting Pty Ltd, dated 5 June 2025.

TfNSW request further information to confirm that the traffic mitigation measures presented within the Birriwa Solar Farm Mod 1 will adequately address the Birriwa Solar Farm Mod 1's proportionate impacts. TfNSW requests that further information be addressed within a revision to the TIA prepared by EMM Consulting for the Birriwa Solar Farm Mod 1, to address the points raised within the table in **Attachment 1**.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment 1**. 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](mailto:development.renewables@transport.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to be "Nathan Boscaro".

**Nathan Boscaro**

Manager Development Services - West

Transport Planning

Planning, Integration and Passenger

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Attachment 1

**SSD-29508870-Mod-1, Birriwa Solar Farm, Barneys Reef Rd, Birriwa; Response to Modification 1**

This attachment relates to TfNSW's response dated 8 October 2025 reference REN25/00151/002.

**Context**

- The Applicant is proposing to increase heavy vehicles from 120 to 156 daily movements.
- The increased heavy vehicle volumes are proposed to travel via an alternative access route along Birriwa Bus Route South via Merotherie Road, which utilises the Golden Highway/Merotherie Road intersection.
- The Applicant is proposing to increase the peak workforce from 500 to 650.
- No changes are proposed for the existing use of the Castlereagh Highway/Barneys Reef Road route, and for high-risk oversize overmass (OSOM) vehicle movements.

**TfNSW comments**

No.	TfNSW comments on Modification 1
1.	<p><b>Birriwa workforce accommodation camp, optional use for other projects</b></p> <p>Section 3.5 of the Modification Report prepared by EMM Consulting (July 2025) acknowledges that <i>“the expansion of the accommodation facility capacity would be potentially provide opportunities for sharing of accommodation with other ACEN projects i.e Valley of the Winds”</i>.</p> <p>TfNSW request clarification from the applicant on how the increased vehicle volumes will be considered and assessed and additionally how the use of the camp by other projects will be assessed.</p> <p>A revised TIA and RTS response should be provided to understand the traffic increases associated with the proposed camp increase and detail how, when and in which approval or modification the impacts will be assessed. The TIA should consider, assumptions, traffic volumes, distributions for the proposed and consider the Birriwa workforce and other major project workforce.</p> <p>If the intent is to capture the revisions to other projects' traffic assumptions as part of the Birriwa Solar Farm modification, then further traffic assessment is required to address the following:</p> <ol style="list-style-type: none"> <li>Any overlapping project traffic volumes and timelines associated with the sharing of accommodation facilities with other projects as part of a revised turn warrant assessments for the intersections with the state road network for the relevant intersections for Birriwa and other projects that will share the accommodation facilities.</li> <li>Point 1, reassessment of the traffic assumptions, routes and conservative turn warrants scenarios must occur for each separate project that chooses to use the</li> </ol>

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	Birriwa Solar Farm workforce accommodation facility and identify how any changes to the mitigation measures will be captured either as part of the Birriwa Solar Farm modification 1 or other approval pathways.
2.	<p><b>Traffic reassessment and clarification requirements</b></p> <p>The traffic assessment provided as part of the EMM Consulting TIA for Birriwa Solar Farm Mod 1 requires the following clarifications and revisions as part of a revised TIA:</p> <ul style="list-style-type: none"> <li>a. The vehicle movements identified in Table 4.1 of the TIA are not considered the worst-case scenario, as the project peak hour vehicle movement numbers have not been applied to the background network peak hour.</li> </ul> <p>Note – This is not applicable If the vehicle movements for the construction of the Birriwa Solar Farm and BESS are restricted to only occur during the project's peak hour (6-7 am and 5-6 pm), with no vehicle movements occurring during the network peak hour for the Golden Highway or Castlereagh Highway. This also needs to be accompanied by systems to monitor and enforce all site users only utilising the network during the construction peak.</p> <ul style="list-style-type: none"> <li>b. The traffic assessment has not captured the cumulative traffic volumes associated with the construction of the CWO REZ Transmission Line at the Merotherie Road and Golden Highway intersection. To understand the traffic implications with both projects the traffic assessment must be revised to include the background and turning traffic volumes associated with the Merotherie Road/Golden Highway intersection that are attributed to the CWO REZ Transmission Line.</li> <li>c. Confirm the timeframes for the pre-construction minor works and if there will be an overlap of the pre-construction minor works period with the construction period. If the overlap of the pre-construction and construction works period is representative of the worst-case scenario then the turn warrants assessment must be revised to assess the cumulative traffic volumes associated with the overlap of these periods.</li> </ul>

#### Advisory notes

1. The Instrument of Consent for Birriwa Solar Farm SSD-29508870 states the definition of a vehicle movement to be 'One vehicle entering and leaving the site'. This aligns with the definition typically used by DPHI. Thus, changing the meaning from 'movements' to 'trips' would be incorrect.
2. Communication and mitigation measures between the Applicant and bus operators impacted by the use of the proposed additional route is to be included within the post-consent Traffic Management Plan.

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