

20 October 2025

TfNSW reference: REN 25/00054/003

Your reference: SSD 29491142

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

Attention: Cameron Ashe

By Email: cameron.ashe@dpie.nsw.gov.au

SSD-29491142, Coborra Solar Farm and BESS, located approx. 20km south west of Dunedoo and 55km east of Dubbo in the Central West Orana (CWO) Renewable Energy Zone (REZ). Response to Environmental Impact Statement

Transport for NSW (TfNSW) is responding to the Coborra Solar Farm and BESS, exhibited from 29 August 2025 to 01 October 2025 and referred via the Major Projects Portal.

TfNSW has reviewed the *Environmental Impact Statement (EIS) SSD-29491142, Coborra Solar Farm* prepared by Aecom dated 31-Jul-2025 and *Traffic and Transport Impact Assessment, Coborra Solar Farm* prepared by Aecom and dated 28-May-2025 as key documents for preparing this response.

The information provided in the EIS does not demonstrate that the Coborra Solar Farm and BESS 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 (where applicable), to be submitted with the Response to Submissions (RtS).

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment A**. Please note **Attachment B** comprises Advisory Notes for your attention.

If you have any questions, please contact Alexandra Long, Development Services Case Officer, at 1300 019 680 or email development.renewables@transport.nsw.gov.au

Yours sincerely,



Nathan Boscaro

Acting Manager Development Services - West

Transport Planning

Planning, Integration and Passenger

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Attachment A

SSD-29491142, Coborra Solar Farm and BESS, located approx. 20km south west of Dunedoo and 55km east of Dubbo in the Central West Orana (CWO) Renewable Energy Zone (REZ). Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 20 October 2025 reference REN 25/00054/003.

Key issues:

- Traffic and asset impact assessment for the pre-construction minor works required.
- Modifications to the supplied strategic concept design for Access Point 5 required.
- Further details required for the High-risk OSOM route analysis. Scope of intersections and/or scope of ancillary works. Drainage/underboring – requesting concepts. – to avoid modification. Typical cross sections required to demonstrate compliance with Austroads/Tech guidelines/supplements etc.
- Cumulative impacts – affects turn warrant assessment, needs to be included in worst-case scenario, source of truth.
- Staging/timing – pre-construction minor works/enabling works. Understanding the volumes, quantify the traffic volumes, timeframes and the routes (same/different?), mitigation measures (e.g TTM, current traffic conditions), flow on impacts.
- Parallel activities (e.g accommodation)

TfNSW Additional information Request

1. Pre-Construction minor works

A targeted assessment of pre-construction minor works is requested, explicitly addressing the following:

- a) Provide anticipated AM and PM peak hour traffic volumes during the pre-construction minor works period, ensuring they are comparable to existing land use conditions.
- b) Confirm a commitment to consult and coordinate traffic management measures with other concurrent renewable projects utilising the same intersection, to minimise cumulative impacts and ensure safe and efficient network operation.
- c) Confirm whether the intersection of Laheys Creek Road and the Castlereagh Highway is proposed to be utilised during the pre-construction minor works phase. If so, detailed information should be provided, including anticipated traffic volumes, vehicle types, and any proposed mitigation or management measures.

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2. Traffic Impact Assessment (Turn Warrant and safe intersection sight distance assessments)

- a) The traffic assessment must be updated to include SIDRA modeling and revised turn warrant assessments that consider the worst-case scenario, accommodation camps, peak cumulative project traffic occurring at the same time as the cumulative road network peak for both the AM and PM peak hours. This should be completed for all intersections and access points, noting that TfNSW primarily have concerns with the assessment of following impacted state road intersection.
 - i. Golden Highway & Spring Ridge Road
 - ii. Lahey's Creek Road & Castlereagh Highway
 - iii. Golden Highway & Access 5
- b) If applicable, mitigation measures should be identified and proposed to address road safety and traffic management risks associated with the project. The proponent is responsible for clearly demonstrating how the existing turn treatments would accommodate the turning volumes without queuing on the state road network and increasing the risk of accidents. Mitigation measures may include items such as, intersection upgrades, offsetting the start and end times from other project-related traffic and route restrictions. The proposed measures must be stated and committed to within the revised.
- c) A Safe Intersection Sight Distance (SISD) assessment must be prepared for the following
 - i. Laheys Creek Road/Castlereagh Highway intersection
 - ii. Golden Highway and Access Point 5

The plans must be prepared in accordance with Austroads Guide to Road Design Part 4A and TfNSW supplements and be provided with the revised TIA. The plan must demonstrate that compliant SISD is achieved and identify any mitigation measures or scope of works required to achieve compliant SISD.

- d) If the outcome of the assessment of point 2 (a) to (c) determines an intersection or road works are required to improve SISD for the Laheys Creek Road/Castlereagh Highway intersection, then a strategic concept design (refer to advisory note 1) will be required to be prepared and will need to be included within the project scope and submission of the revised TIA.

3. Road Widening requirements at Golden Highway and Spring Ridge Road

TfNSW has reviewed the 26m B double swept path analysis which highlights widening required on both the side of Spring Ridge Road and requires the following matters to be addressed.

- a) Clearly identify any road upgrade works proposed (considering Point 2a) at the intersection of the Golden Highway and Spring Ridge Road, including location, extent, and timing and reliance on Port to REZ, for the required widening to accommodate the B-double heavy vehicle swept paths.
- b) The proposed works should then be compared with the works for Port to REZ Spring Ridge Road design to determine if proposed widening as part of this project will provide sufficient pavement width to accommodate the turning path of the B-double heavy vehicle (in particular, the left out turn path from Spring Ridge Road onto the Golden Highway).

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- c) If further pavement width is required to accommodate the B-double heavy vehicle swept path, then a strategic concept design will be needed, and the additional pavement width at the Spring Ridge Road/Golden Highway intersection will need to be included within the project scope which includes the following
- i. Plan package is to be dimensioned.
 - ii. Minimal line-marking and delineation has been shown. Insufficient information has been provided to assess proposed widening works, crossfall etc. Documentation is to be revised with the required delineation details as per TfNSW technical standards.
 - iii. Standard road drainage details covering surface runoff management, subsoil drainage, and culvert configurations
 - iv. Typical cross section detail:
 - v. Drainage detail.
 - vi. Batter slopes need to be Austroads compliant.
 - vii. All drainage structure information is to be provided including drainage lines.
 - viii. Insufficient information provided to assess vertical alignment and drainage grade lines.
 - ix. Concurrent turn movements not shown for design vehicles. Swept path analysis for the concurrent turn movements to be provided for the design heavy vehicle.
 - x. All required signage, including stop signage is to be demonstrated on the plans.

4. Golden Highway and Access Point 5 – Strategic Design

TfNSW has reviewed strategic design and requires the following matters to be addressed to ensure full compliance with applicable drainage and safety design standards.

- a) Plan package is to be dimensioned.
- b) Minimal line-marking and delineation has been shown. Insufficient information has been provided to assess proposed widening works, crossfall etc. Documentation is to be revised with the required delineation details as per TfNSW technical standards.
- c) Include details of the guard rails.
- d) All required signage, including stop signage, is to be demonstrated on the plans.
- e) Standard road drainage details covering surface runoff management, subsoil drainage, and culvert configurations.
- f) Concurrent turn movements not shown for design vehicles. Swept path analysis for the concurrent turn movements is to be provided for the design of heavy vehicles.
- g) The proposed culvert is to be widened, and the drawing package must be updated to accurately reflect relevant design details. This should include:
 - i. An invert level profile
 - ii. A detailed culvert analysis, incorporating blockage factor assessment for pipes exceeding 600 mm in diameter
 - iii. Riprap design at both the upstream and downstream ends.

Note - These elements are to be developed in accordance with the Austroads Guide to Road Design, specifically: Part 5A, Section 3.5 – Hydraulic Design and Invert Levels; Part 5B, Sections 4.4 and 6.3 – Culvert Design and Energy Dissipation; Part 6, Section 5.3 – Roadside Safety and Clear Zones.

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5. High Risk OSOM Concept Route Analysis – Scope and Mitigation Measures

A High Risk OSOM route analysis must be completed for review by TfNSW before the project's determination to ensure all required transport upgrades are considered .

- a) The revised TIA to provide strategic concept designs that identify the scope of roadworks, pavement strengthening, or modifications to the state road infrastructure (at the locations mentioned along the network) for locations where high-risk OSOM swept paths indicate high-risk OSOM traversing the state road infrastructure.
- b) Provide the dimensions and weights of the laden high risk OSOM movement for the project.
- c) Temporary changes to state road assets will need to include the length of time they will be affected, any interim treatments (e.g., line marking), and when and what will replace the asset post-completion of high-risk OSOM movement.
- d) Signs/light poles maybe required to be removed. Details on any temporary signage and the timeframe for replacing traffic signs are to be included.
- e) The pull-over bays and rest areas as identified, are required to be provided with full dimensions demonstrated on the plan package.
- f) A consistency check is to be submitted for the section of the route along EnergyCo's Port to Central West Orana REZ works.
- g) NHVR Route ID has not been provided. This is required to ensure a complete assessment of route considerations has been provided. See advisory note.
- h) Bridge and culvert assessments are required for the route. See advisory note.
- i) Any other TfNSW projects along the route should be noted and identified in the route study.
- j) Rail requirements and crossing are to be considered. See advisory notes

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TfNSW Advisory Notes

1. Strategic concept designs are required for works along the state road network route. <https://www.transport.nsw.gov.au/system/files/media/documents/2024/Strategic-Design-requirements-for-DA-Factsheet.pdf>
2. Turn treatments must comply with Austroads Guide to Road Design Part 4A, here: <https://austroads.gov.au/publications/road-design/agrd04a>
3. Safe Intersection Sight Distance (SISD) must comply with Austroads Guide to Road Design Part 4A and TfNSW supplements to Austroads, noting that TfNSW adopts different reaction times for SISD. AGRD04A | Austroads
<https://austroads.gov.au/publications/road-design/agrd04a>
4. Austroads Design Vehicles and Turning Path Templates (AP-G34-23) must be reviewed for swept path analysis requirements.
5. The updated route study must include a reference to a Route ID utilising the NHVR portal website. <https://www.service.nhvr.gov.au/#page=informationHub/routePlannerTool>
6. The rest areas and pull-over locations are required to be sufficient to comply with NHVR fatigue management requirements and any day or nighttime travel restrictions on the network.
7. Turn warrant assessments are to be in accordance with Section 3.25 of Part 6 of the Austroads Guide to Traffic Management.
8. Bridge assessments for TfNSW assets can be obtained by contacting spu@transport.nsw.gov.au.
9. All pavement that is to accommodate the project traffic, heavy vehicles, light vehicles, and high risk OSOM, is to consist of permanent pavement treatments that are consistent with the existing state road pavement.
10. As the overall combination height exceeds 5m, the operator will require third-party electrical approval.
11. If the proponent requires the use of UGLRL assets, the applicant must consult with UGLRL.

This can be done through lodgment of a request for a permit via the National Heavy Vehicle portal, or directly to UGLRL via “heavyvehicle@uglregionallinx.com.au”. The applicant must submit the request at least two (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.
12. It is advised that the proposed haulage routes would also be crossing the rail corridors managed by Agencies other than TfNSW. It is recommended that the DPHE should refer this application to other relevant agencies (e.g. ARTC and Sydney Trains).

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