

Ref: DOC25/723305

29 August 2025

Jess Fountain
Project Officer
Department of Planning, Housing and Infrastructure

Re: Birriwa Solar Farm Modification (SSD-29508870-Mod-1)

Dear Jess,

Thank you for consulting with EnergyCo regarding the proposed modification to the Birriwa Solar Farm (SSD-29508870-Mod-1) located in the Central-West Orana (CWO) Renewable Energy Zone (REZ).

EnergyCo provides the following comments:

Cumulative Traffic Impacts

The Response to Submissions (RtS) and supporting Traffic Impact Assessment (TIA) identify upgrades to Birriwa Bus Route South and intersection works at Barneys Reef Road with the Golden and Castlereagh Highways. These are the same haulage routes and intersections that will be relied upon by the CWO Transmission Line Project.

- The TIA models Birriwa traffic only, without incorporating concurrent construction traffic from the CWO transmission line and other REZ projects.
- Peak construction workforce and vehicle movements are assessed in isolation, creating a risk that congestion, safety issues, and community amenity impacts are understated.
- It is unclear if traffic associated with the Birriwa Solar Farm project will utilise the proposed alternative access before the intersection of Merotherie Road and the Golden Highway, and the section of Merotherie Road between the Golden Highway and Birriwa Bus Route South is fully upgraded by the Network Operator.

We recommend an updated cumulative TIA that includes projected traffic volumes from the CWO transmission line and other major REZ developments, and considers traffic generated by the establishment of ancillary infrastructure, to effectively demonstrate the overall cumulative impacts.

Road Upgrade Responsibilities

The RtS indicates sealing and widening of BBRS and intersection upgrades as mitigation. However, we would like to request clarification on whether these are to be delivered solely by the Birriwa Solar Farm or whether reliance is assumed on works by EnergyCo or others.

Social Impacts and Workforce Accommodation

The Social Impact Assessment (SIA) highlights the benefits of the expanded workforce accommodation facility (up to 1,000 workers), reducing housing pressure and commuting trips. While this is positive, the SIA does not consider cumulative workforce numbers across concurrent REZ projects. Without a coordinated approach, there remains potential strain on local services (health, policing, emergency response) and reputational risks if communities perceive a single wave of disruption from multiple projects.

We recommend the inclusion of cumulative social impacts in the SIA, particularly workforce accommodation, local services, and amenities along shared haulage routes.

Coordination and Governance

The RtS demonstrates that multiple REZ projects will use overlapping infrastructure, workforce accommodation, and local services. Without coordinated planning, there is a risk of duplicated works, community distrust, and gaps in emergency response.

Recommendation: Consider the establishment of a joint working group between ACEN, EnergyCo, and other REZ proponents, focused on:

- traffic and haulage scheduling;
- workforce accommodation and service demand management; and
- cumulative emergency evacuation planning.

Please contact David Koppers, Manager Planning at David.Koppers@energyco.nsw.gov.au should you wish to discuss.

Sincerely,

SSchofield

Shannon Schofield
A/ Director Planning & Policy