

11 March 2026

TfNSW reference: REN 26/00008/001, SF 2026/008717

Your reference: SSD-38358962

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

By Email: jess.watson@dpie.nsw.gov.au

Attention: Jess Watson

SSD-38358962, Keri Keri Wind Farm, Sturt Highway, Keri Keri; Response to Submissions

Transport for NSW (TfNSW) is responding to the Keri Keri Wind Farm, Response to Submissions and referred via the Major Projects Portal.

TfNSW has reviewed:

- Keri Keri Wind Farm Amendment Report Reference No. 0617753, dated 16 January 2026;
- Keri Keri Wind Farm Amended Traffic & Transport Impact Assessment prepared by The Transport Planning Partnership dated 13 January 2026;
- Keri Keri Wind Farm 91.5m blade Route Study Start location: NSW/Vic Border – Euston, End location: Keri Keri Revision: REV 03 dated December 10, 2025 prepared by REX J Andrews.,

as key documents for preparing this response.

TfNSW acknowledges that the majority of the previously identified matters have been satisfactorily addressed. However, several design items, as outlined in Attachment A, remain outstanding and require further resolution. TfNSW advises that a new request for information has been raised within point 5; however, TfNSW acknowledges the late nature of the request and notes that it may not be addressed prior to the determination of the project.

Please note that the primary purpose of this request for additional information is to confirm that the proposed designs are consistent with Austroads requirements, clearly define the scope of works, and demonstrate that potential impacts to the State road network are appropriately mitigated from a safety, operational efficiency, and asset management perspective.

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

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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,

A handwritten signature in black ink, appearing to read "Alexandra Power".

Alexandra Power
A/Manager Development Services - West
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This attachment relates to TfNSW's response dated 11 March 2026 reference REN 26/00008/001.

TfNSW additional information requested | TfNSW comments

Refer to the advisory notes below for information to assist with revising the TIA.

1. Preconstruction Minor Works for workers accommodation camp traffic assessment requirements

A complete assessment of the wind farms and workers' accommodation camp construction pre-construction minor works is required and is to include:

- a. Assessment of traffic volumes and identification of the types of vehicles that will be used during this period, including the largest design vehicle.
- b. Perform a swept path analysis for the largest heavy vehicle at the existing intersection, ensuring it can navigate within the current pavement. If the design vehicle cannot turn easily, implement necessary mitigation or temporary works.
- c. Assess existing Safe Intersection Sight Distance (SISD) and propose measures to achieve compliance,
- d. Identify AM/PM peak hour traffic volumes and proposed volumes during this time. Traffic volumes during the AM/PM peak hours are to be comparable to those of the existing land use.
- e. Identify measures to minimise project-related traffic during peak periods, like carpooling or shuttle buses.
- f. Outline methods to monitor and enforce traffic volumes during peak hours and other proposed mitigation measures.
- g. Provide a timeline and schedule for pre-construction minor works.
- h. Describe how to inform the community and stakeholders about increased traffic.
- i. Specify the hours for pre-construction minor works.
- j. Assess traffic associated with any temporary workforce accommodations during the pre-construction minor works period.
- k. Identify any necessary temporary widening or works for the design vehicle.

Note: No oversized overmass (OSOM) vehicles are permitted unless a swept-path analysis demonstrates compliance.

Note: Temporary traffic controls are not allowed at intersections undergoing pre-construction minor works unless otherwise agreed with TfNSW.

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2. Workforce Accommodation Camp (previously requested 20 June 2024)

- a. Identify timing and sequencing of workforce accommodation camp construction.
- b. Provide a turn warrant assessment for the worst-case scenario of workforce accommodation camp construction and post-completion (entire operation).
- c. Identify traffic volumes required for pre-construction work that will occur in parallel.
- d. Assess operational traffic volumes for servicing accommodation camps, vehicle types, and AM/PM peak hour changes for traffic generation at each intersection with the state road network along construction transport routes.

3. Strategic Concept Design Amendment

- a. Revision D civil Design, RJ Andrews SPA - Murray Valley Hwy onto Sturt Highway - The existing fill embankment is high, with swept paths showing to track close to cadastre boundaries. Hardstand areas will need to be quantified to determine the scope and footprint of the fill required for the embankment and to confirm whether land acquisition is required.
- b. Revision D Civil Design, RJ Andrews SPA - Murray Valley Hwy onto Sturt Highway - There appear to be numerous underground utilities located on the south-east corner of the intersection. Further investigation required to determine the level of impact.
- c. Revision D, Civil Design, RJ Andrews SPA - Sturt Highway at Balranald - TfNSW preference is to maintain the current intersection configuration with medians and kerb and channel. Revised strategic concept designs required that references to the barrier kerb be removed and replaced with a roll-over kerb to facilitate movements onto the hardstand.
- d. Drainage pits will need to be assessed and made trafficable as required. To be annotated on the strategic concept designs.
- e. Revision D, Civil Design RJ Andrews SPA - Keri Keri Northern Site Entrance - A swept path analysis has been provided. A strategic concept design of this intersection will be required prior to determination to confirm the impacts on the Sturt Highway.
- f. Revision D, Civil Design RJ Andrews SPA - Keri Keri Road intersection - A hardstand strategic concept design will be required prior to determination to confirm the impacts on the Sturt Highway and how it will interact with Keri Keri Road. How will the hardstand be managed to reduce the likelihood that light vehicles will use the hardstand daily?
- g. Revision D Civil Design RJ Andrews SPA - Sturt Highway at Euston - TfNSW requires a strategic concept hardstand design prior to determination, that includes the kerb replacement, existing drainage and other infrastructure checks that will impact on the scope of the road upgrades/modifications.
- h. Revision D Civil Design RJ Andrews SPA - Parking Bay @86m near Balranald (Left turn into Duryea Street - The proposed parking bay is adjacent to the left turn lane into Duryea Street and private service centre. It is unsealed and poses safety concerns given the number of conflict points at this location. Is there another viable location with reduced conflict points that can be utilised/constructed?

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- i. Revision D Civil Design - 21012CAD003 Figure 2
 - The existing fill embankment is high, with swept paths showing to track close to the cadastre boundaries. Hardstand areas will need to be modelled as part of the strategic concept designs to be revised prior to determination, to quantify the fill embankment and confirm the exact scope of the road works, and to determine whether acquisitions are required.
 - There appear to be numerous underground utilities located on the southeast corner of the intersection. Further investigation required to determine the level of impact.
- j. Revision D, Civil Design, 21012CAD003 Figure 5 –
 - TfNSW preference is to maintain the current intersection configuration with medians and kerb and channel. Please replace the barrier kerb with a roll-over kerb to facilitate movements onto the hardstand. Drainage pits will need to be assessed and made trafficable as required.
 - Where the raised island is proposed to be removed, TfNSW's preference is to retain this island and make parts of or the whole length trafficable.
- k. Revision D, Civil Design, 21012CAD003 Figure 9 - Keri Keri Road - The intersection of Sturt Highway, Keri Keri Road and Loorica Road is a four-way intersection. This arrangement is undesirable, as road users may not perceive that they are approaching an intersection and may continue through, increasing the likelihood of a side-impact crash. Austroads Guide to Road Design provides guidance on modifying four-way intersections to a staggered T intersection to mitigate this risk. Due to this development, traffic on Keri Keri Road will increase significantly, increasing the likelihood of this crash type.
- l. Revision D, Civil Design 21012CAD003 Figure 9 - Keri Keri Road -The intersection angle is 70 degrees, which is allowable by the standards; however, it is the absolute minimum. Is there an opportunity to better align Keri Keri Road with the Sturt Highway?
- m. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access – revise strategic concept designs to identify that the shoulder will be sealed along the length of the Sturt Highway to prevent edge breaking
- n. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access - All shoulders adjacent to the intersection are to be sealed.
- o. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access - Pavement joint appears to be located under wheel path. Please revise the box-out location.
- p. Revision D, Civil Design 21012CAD003 Figure 17 - Typical Cross Section - Au

4. Confirmation of completion of bridge assessments

The revised Keri Keri Wind Farm Amended Traffic and Transport Impact Assessment, inclusive of the revised RJA Route Study (in appendix B), does not provide evidence or confirm that a bridge assessment of the TfNSW assets has been completed. The TIA is to be revised to include evidence of the bridge assessment being completed and to provide the report as an appendix to the TIA. If a bridge assessment has not commenced, then it is advised that the proponent

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complete the bridge assessments by contacting spu@transport.nsw.gov.au and providing the NHVR Route ID and the following information:

- Overall dimensions (width, height and length) of the laden load (laden load is the vehicle combination and the load to be transported),
- Total weight of the laden load,
- GSM,
- Payload,
- deck height,
- axle configuration,
- axle spacing, including from the prime mover, and
- axle masses (including split axle and group axle masses).

5. Additional assessment requirement not previously raised- travel time delay for narrow segments of the state road network and suitability of existing pull-over locations

TfNSW advises that there are narrow paved segments of the state road network below 9.6m that will be traversed by the wider loads, which will impact the ability of oncoming and following vehicles (in particular, heavy vehicles) to safely pass the proposed widest loads for the project. TfNSW recommends, prior to determination, assessing the maximum travel time delay to oncoming and following vehicles based on the average speed of following and oncoming vehicles and the average travel speed of the widest loads proposed to travel along the narrow segments of the network below a paved surface width of 9.6m.

TfNSW advises that the maximum delay that would be considered acceptable would be 10-15minutes and that suitable existing pull-over bays and rest areas will need to be identified along the state road network to achieve the maximum travel delay. As part of this assessment, swept-path analysis and diagrams showing that the widest loads can access and park wholly within the pull-over lane, clear of the through lanes, will be required.

TfNSW notes that known narrow segments include segments from Buronga to the Keri Keri project site on the Sturt Highway.

TfNSW notes that this advice has not been provided at EIS and therefore acknowledges that this may not be addressed prior to determination. However, it is strongly advised that travel time delays are considered, given the high proportion of heavy vehicles using this route and known crash occurrences on this network associated with overtaking.

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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 by lodging a request for a permit via the National Heavy Vehicle portal, or directly to UGLRL at “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 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 and Sydney Trains).

Comments on designs that must be addressed post-consent as part of concept and detailed design Process

13. An AS1158 lighting design will need to be provided in the detailed design stage (not required prior to determination).
14. The extent of land acquisition needs to be confirmed, and the process of acquiring the land will need to commence during the WAD process.
15. Utility designs will be required to be completed in detail during the concept and detailed design phase to understand the impact on utilities and required adjustments.

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