Transport for NSW

13 March 2026

TfNSW reference: REN 26/00015/001 – Mod 01

Your reference: SSD-29704663

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Attention: Gracie Jackel

By Email: gracie.jackel@dpie.nsw.gov.au

SSD – 29704663, MUSWELLBROOK BESS PTY LTD Muswellbrook Battery Energy Storage System Modification 1 -

Reference is made to the Proposed Modification 01 prepared by Amber Organisation reference No. 373 dated 26 November 2025, submitted to Transport for NSW (TfNSW) for consideration as a component of Modification 01 application and as submitted via the Major Projects Portal on 12 February 2026.

TfNSW has reviewed the Modification 01 Application noting the following key reports for preparing this response:

- *Muswellbrook Battery Energy Storage System SSD-29704663 - Traffic Management Plan Revision B, prepared by Amber Traffic & Transportation Direction dated 26 November 2025*
- *Muswellbrook Battery SSD- 29704663 - Proposed Modification prepared by Amber Organisation reference No. 373 dated 26 November 2025.*
- *MUSWELLBROOK BESS PTY LTD Muswellbrook Battery MODIFICATION APPLICATION Project number: P003248 prepared by Premise, dated 27 November 2025*

The information provided in the Modification 01 Application shows the modification application to include:

1. Changes to the approved layout plan (refer Figure 7) to include minor upgrade and widening works to the access driveway located within the development footprint, together with a minor adjustment to the small area of road sealing at the property access within the Sandy Creek Road reserve that is shown in Appendix 3 of the consent (refer Figure 8);
2. Changes to Appendix 6 of the consent to reflect the current extent of Aboriginal heritage site 37-2-5953(refer Figure 9);
3. Changes to condition B26 with respect to the timing of the required fire safety study and the installation of the batteries.

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4. Changes to the height of the approved noise barriers from 3 to approximately 4 metres to ensure compliance with condition B14 of the consent at all non-associated residences with the adoption of the selected battery technology; and
5. Changes to vehicle delivery sizes (but not numbers) required due to the adopted battery technology, which has evolved since the application was lodged.
6. Changes to the oversize overmass route assessment to address changes to the transformer size, and to include both a port of import option and an option to procure the transformer from a Melbourne based supplier sizes (but not numbers) required due to the expected battery technology, which has evolved since the application was lodged.

TfNSW requests further information as outlined in **Appendix A**. Please note that the primary purpose of this request for additional information is to confirm that the proposal is consistent with Austroads requirements 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 a revised TMP and OSOM haulage route study be provided and include track changes and a reconciliation table to identify where the changes to the TIA have been made.

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

Yours sincerely,

Alexandra Power

Manager of Development Services – West

Transport Planning

Planning, Integration and Passenger

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Attachment A

SSD - 29704663, MUSWELLBROOK BESS PTY LTD Muswellbrook Battery Energy Storage System Modification 1

This attachment relates to TfNSWs response dated 13 March 2026 reference REN26/00015/001

TfNSW additional information requested | TfNSW comments	
OSOM route assessment scope and mitigation measures to include proposed new route from Melbourne	
1.	A 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: a. Port or point of origin for the entire route to the site access and intersections required to facilitate high risk OSOM movements required for the project. b. The high-risk OSOM laden loads, class and vehicle configuration must include the following information regarding the dimensions, weight and length: • NHVR route ID, • 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 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). c. The TIA is required to include details of all high risk OSOM loads and vehicle configurations for the project. d. The location of pull-over bays / rest areas along high risk OSOM routes (including GPS coordinates) and demonstrate through swept paths that high risk OSOMs can be physically accommodated for the project (in terms of size, width and accessibility). e. Bridge Assessments for any at risk bridges on classified roads due to dimensions and weight of OSOM vehicles, contact spu@transport.nsw.gov.au to request a bridge assessment of TfNSW assets. f. The design vehicle templates used in the swept path analysis software are also requested in order for TfNSW to review the performance within the software (e.g. Autodesk Vehicle Tracking or Transoft AutoTURN) or alternatively include within the swept paths the wheel track, body of the OSOM component, offset, the start and completion of the movement around to manoeuvre a pinch point, the speed, steering arrangement and

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	demonstrate compliance with with Austroads Design Vehicles and Turning Path Templates. g. Highlighting each at-risk road structures that the haulage route crosses including bridges, traffic signals, medians, pedestrian refugees, signage, major culverts, and minor culverts that may not meet the desirable cover to cater for proposed axle loads or could be impacted by the high-risk OSOM movements. h. Traffic mitigation measures or road works, modifications, or road upgrades to facilitate the movement of the high risk OSOM(s) associated with the project. i. Traffic mitigation measures or road works, modifications, or road upgrades to facilitate the movement of the high risk OSOM(s) associated with the project. 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). k. Include any surveys or pavement investigations as part of the high-risk route analysis. l. Identify and assess implications of any road and rail projects under construction during the indicative schedule for project related OSOM movements. m. Identify any rail level crossing along the route. n. Consider the time frames to complete manoeuvres of pinch points or to travel through rural areas with narrow travel lanes and minimal overtaking opportunities. Traffic modelling may be required to understand the optimal timing for high-risk OSOM movements to occur. *Note: Narrow travel lanes, minimal existing overtaking lanes or pull over bays, high proportion of background traffic or heavy vehicles and constrained road geometry may warrant the requirement for additional pull over or rest area locations to manage the impacts to through traffic.*
2.	TMP is to be updated to include all amendments/updates.
3.	Concern is raised as to how queuing of vehicles is to be managed, with consideration given to longer vehicle combinations. It is recommended that a practical mitigation strategy be prepared and implemented, incorporating measures such as staged traffic management, avoiding peak travel periods, enforcing reduced speed limits, and addressing potential vehicle queuing at the intersection of New England Highway/Sandy Creek Road/ and having regard to the proximity of the rail crossing.
4.	Applicable conditions to be amended and updated accordingly, including: • B1(b) • B8 Traffic Management Plan to be updated. Appendix 4 should include additional haulage routes.

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5.	It is recommended that the proposed intersection upgrade works (New England Highway/Sandy Creek Road) are to be completed prior to the commencement of any works associated with the development.

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.

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