

Energy Assessments  
Department of Planning & Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

**Attention: Kurtis Wathen**

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**SSD-35160796 for Apsley Battery Energy Storage System ('BESS') at 9010 Mitchell Highway, Apsley (Lot 3 of DP1012686)**

20 October 2022

Dear Kurtis,

Thank you for referring the abovementioned application via the NSW Major Projects Planning Portal dated 15 September 2022 inviting comment from Transport for NSW (TfNSW). Apologies for the delayed response.

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Mitchell Highway (HW7) is a classified (State) road and an approved B-Double route with a sign-posted speed of 100km/h. Council is the roads authority for this road and other public roads in the area, in accordance with Section 7 of the *Roads Act 1993* (Roads Act).

TfNSW understands that the proposal seeks approval for the construction, operation and decommissioning 240MWh BESS comprising 40ft battery containers and 40ft inverter and MPVS containers with supporting ancillary infrastructure. A new access from the Mitchell Highway to the site is proposed to be constructed towards the northwest corner of property to accommodate a 19m articulated vehicle. In addition, the proposal seeks to implement a TMP to limit movements to left in / left out only and traffic control to reduce the speed limit to 80km/h during the "peak construction phase" (an unidentified point within the predicted 5 months construction period).

TfNSW has reviewed the information provided, including a Traffic Impact Assessment, prepared by *Traffic Works*, dated 30 May 2022 and the Environmental Impact Assessment, prepared by *Premise*, dated 23 August 2022, and is not satisfied that the proposed development has adequately addressed the anticipated construction traffic impact to ensure that the new access can provide safe and practical access. Accordingly, TfNSW does not support the application as proposed.

TfNSW recommends that DPE ensure that the following matters are addressed should any further submissions be made for comment:

- The proposed left-in/left-out arrangement for light vehicles, as managed by a future Traffic Management Plan, is not supported. The nominated detoured route via Dripstone Road is not considered reasonable (as it more than doubles the length of time than the most direct route using a right-turn) and therefore is not a practical solution. Furthermore, Dripstone Road is a highspeed local road without line-marking or shoulders and is

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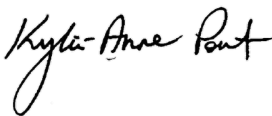
## Transport for NSW

traversed by a level crossing. The road is more suitable to localised traffic conditions unburdened by the additional traffic proposed by the development.

- A temporary speed reduction of 80km/h on Mitchell Highway to address design and safety deficiencies associated with the proposed access will not be supported by TfNSW. Instead, the proposal should consider an appropriate intersection treatment consistent with *Austrroads Guide to Road Design* beyond plotting basic traffic volumes on the warrant graphs to identify minimum treatments. Instead, the intersection treatment should consider the overall safety and operational performance including sight distance, road user type (e.g. proportion of heavy vehicles) and the 85<sup>th</sup> percentile speed which is often higher than the signposted speed on rural roads.
- A scaled strategic design of the proposed access addressing the above points should be provided for consideration.
- Longitudinal drawings submitted as an appendix to the Traffic are insufficient to illustrate the SISD for the proposed access location. The application should be supplemented with scaled drawings illustrating the SISD in a plan format for the design speed (being 110km/h for all vehicles) as well as a 2.5sec R<sup>t</sup> to account for traffic activity outside daylight hours or in adverse weather conditions.
- Confirmation of the total mass for the 40ft containers (battery and inverter) and proposed design vehicle dimensions including swept paths (for all directions) at the access to the site.
- The proposed subdivision plan should be updated to illustrate legal and physical access to a public road to ensure that the development does not create a land-locked allotment.
- Confirmation of the anticipated construction period (e.g. Q2-Q3 2023) and peak construction phase.

If you wish to discuss this matter further, please contact the undersigned on ph. 0481-068-175.

Yours faithfully,



**Kylie-Anne Pont**  
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West Region | Community and Place  
Regional and Outer Metropolitan