Transport for NSW

4 July 2025

TfNSW reference: REN25/00086/002
Your reference: SSD-72430958

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

Attention: Samantha Wynn

SSD-72430958, Finley Battery Energy Storage System - Various Lots, Berrigan Shire Council; Response to Environmental Impact Statement

Dear Samantha,

Transport for NSW (TfNSW) is responding to the exhibition of the Finley Battery Energy Storage System (BESS), which was exhibited from 29 May 2025 to 27 June 2025 and was referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by Premise dated 7 May 2025 and the Traffic Impact Assessment (TIA) prepared by Premise dated 2 May 2025, as key documents for preparing this response.

The information provided in the EIS does not demonstrate that the Finley 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 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 and B**. If you have any questions, please contact Glen Hanchard, Development Services Case Officer, at 1300 019 680 or email development.renewables@transport.nsw.gov.au

Yours sincerely,

Nathan Boscaro
Manager Development Services - West
Transport Planning
Planning, Integration and Passenger

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This attachment relates to TfNSW's response dated 4 July 2025 reference REN25/00086/002.

TfNSW additional information requested | TfNSW comments

TfNSW requests the additional information on the key issues identified, as detailed below, to be included in a revised TIA and EIS (where applicable) and submitted with the Response to Submissions (RtS). It must be clear where changes have been made in the revised TIA, which can be in the form of a document with tracked changes or a table provided in the updated TIA detailing the changes made, including where and what they are.

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

Key Issue 1 - Traffic Impact Clarifications

The worst-case scenario of both the AM and PM peaks of the development has not been adequately addressed. The project's impact on the state road network due to increased traffic volumes must be adequately considered. The proponent is to ensure discrepancies are corrected and to consider the worst-case scenario for both AM and PM peaks, including background traffic and turning volumes. TfNSW requires the following matters to be addressed in the response to submissions

a) The following issues are required to be addressed relating to the traffic assessment and subsequent turn warrants provided:

   i. Section 4.3.1 of the TIA notes that the turn warrants assessment focuses on the AM peak. The reason given is that the AM peak is likely to generate the highest number of trips, which determines the intersection treatments. The turn warrant assessment is to be revised to include the PM peak hour traffic volumes for project traffic at peak of construction. The turn warrant assessments are to be prepared in accordance with section 3.25 of Part 6 of the *Austroads Guide to Traffic Management* (see advisory note 6).

   ii. The AM and PM peaks identified in the SIDRA analysis differ from those used in the turn warrant assessment. The SIDRA analysis on page 4.3.4.1 indicates that the worst-case scenario using the Wednesday background traffic data was used, whilst in Section 3.6.1.2, an average was used across all days. It is essential to understand the AM and PM peaks, as they inform the worst-case scenario applied to the turn warrants. The TIA is to be revised to ensure that the SIDRA analysis and turn warrants assessment represent the same worst-case scenario for the AM and PM peak hours at the peak of construction.

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Key issue 2: Issues with utilising existing turn treatments

The existing turn treatments are deficient. The proponent is to provide strategic concept designs demonstrating compliance with Austroads Guide to Road Design Part 4A. The project intersection strategic designs must be updated based on the outcome of the updated analysis and to ensure that the largest vehicles using the intersection can be accommodated within the pavement. TfNSW requires the following matters to be addressed in the response to submissions.

a) **Issue with using the existing Auxiliary Left Turn treatment (AUL)- Canalla Road/Riverina Highway**

The proposal intends to rely on the existing treatments at the intersection of Canalla Road/Riverina Highway. Review of the AUL(s) on Riverina Highway to facilitate a left turn does not comply with Austroads. It will not be able to cater for the increased traffic and design vehicles based on the existing deficiencies, as the AUL(s) does not comply with the length and width requirements for an AUL(s) and do not include sufficient arrow line markings. Strategic concept designs will be required for the upgrade of the deficient AUL(s) that demonstrate the scope of the upgrades needed for the AUL(s) to achieve compliance with Austroads. Refer to advisory notes for specific references to Austroads concerning this point.

b) **Issue with the existing Basic Right Turn treatment (BAR)- Canalla Road/Riverina Highway**

The Basic Right Turn treatment on Riverina Highway, which facilitates the right turn into Canalla Road, does not comply with Austroads. The increased traffic and proposed design vehicles will exacerbate the current safety issues with the non-compliant BAR. Strategic concept designs will be required to be submitted that demonstrate the scope of the upgrades necessary to the existing BAR to achieve compliance with Austroads and TfNSW requirements. The strategic concept designs will need to address the following specific non-compliances with the existing BAR:

i. BAR does not meet the minimum requirement for the situation whereby a road user is not allowed to enter a dedicated left turn lane to pass / navigate around a stored vehicle turning right into the side road.

The proponent must design a compliant BAR intersection treatment and line mark the edge line at a constant 3.5m from the centerline to provide a widened shoulder to satisfy the requirement of a BAR. (AGRD Part 4A – Section 7) The re-design will impact the existing treatments to Marantellis/Riverina Highway. The proponent in their re-design will therefore, need to consider what an appropriate BAR treatment is for both the Canalla and Marantellis Road intersections with the Riverina Highway and ensure both roads have compliant treatments. Consideration to upgrading the intersection with opposing CHRs should be given by the proponent due to the unconventional existing intersection design.

ii. A hold line is to be included set back from the through edge line to hold side road traffic free of the widened shoulder to ensure the BAR intersection treatment will operate as intended. Austroads Figure 7.1 demonstrates requirements for a compliant hold line setback. The setback should take into consideration the unconventional design of the road.

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c) **Road Train width requirement**

The Riverina Highway is a gazetted Road Train route (i.e B-triples) at this location.. The strategic concept designs are to demonstrate an increase of the width of the AUL(S) and BAR for the Canalla Road/Riverina Highway intersection to accommodate the road train heavy vehicles passing the turning project traffic. See advisory note for references to Austroads.

d) **Swept Paths**

Swept paths are required to be provided for the largest heavy vehicle and high-risk OSOM configuration (corresponding to the design and check vehicle) required to use each intersection, access point or navigate pinch points along the high-risk OSOM routes. This must be prepared following Austroads Design Vehicles and Turning Path Templates.

e) **Consideration of bus bays**

The proponent is to demonstrate a safe and conforming solution for the intersection upgrades that take into consideration the existing bus bays. The proponent is to be aware, that if modifications to the bus bays are required to achieve an optimal design, consultation will need to occur. Consideration of relocating the bus bays to allow for an improved, optimized design, should be given. There is potential for a rear end type crash when the bus bay is in use, as there appears to be insufficient offset between the intersection treatment and the bay. Line marking the edge line through at a constant offset should also be considered.

f) **Broockmanns Road consideration**

The proposal also intends to use Broockmanns Road for a proportion of vehicle traffic. The route vehicles will take to access Broockmanns Road is to be identified and further traffic assessments and turn warrants are required for the Will Hamilton St/Riverina Highway intersection, if these intersections are proposed to be used by project traffic.

Key Issue 3 - Staging and pre-construction minor works

Staging/timing of pre-construction minor works/enabling works requires clarification. The updated TIA needs to quantify the traffic volumes, timeframes, and routes (same or different from construction), as well as mitigation measures (e.g., TTM, current traffic conditions) and flow-on impacts for all stages. TfNSW requires the following matters to be addressed in the response to submissions

a) As required by the Secretary's Environmental Assessment Requirements (SEARs) response, the proponent is to provide a separate analysis of pre-construction minor works to the construction analysis. This should include the list of requirements provided by the SEARs, including:

   i. Identification of the traffic volumes and traffic types, inclusive of the largest design vehicle, including those specifically in the AM/PM peak hours. Swept path analysis is required for the existing intersection if concurrent turning movements for the design heavy vehicle are intended at this intersection during the pre-construction minor works phase.

   ii. Identification of any measures proposed to reduce the project traffic and impacts during this period, i.e carpooling, shuttle buses, staggering of traffic and inclusion of enforceable mitigation measures that can be monitored for compliance.

   iii. Provide a schedule of the proposed pre-construction minor works and program of works.

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Identifying the hours for pre-construction minor works.

iv. Assess any overlap of construction and pre-construction minor works periods must be included in the traffic assessment for this stage, before completion of the intersection upgrade.

Key Issue 4 – The high-risk OSOM route assessment scope and mitigation measures

The high-risk oversized overmass (OSOM) vehicle route assessment does not fully consider impacts to the state road network across all identified routes. Further detail regarding these impacts is requested to ensure the compliance of the road upgrades and mitigation measures in accordance with the Austroads Guide to Road Design, the Austroads Guide to Temporary Traffic Management, and TfNSW requirements. TfNSW requires the following matters to be addressed in the response to submissions

a) This section provides overall considerations for the route from the Port of Melbourne which will need to be resolved within the revised TIA.

i. NHVR Route ID has not been provided. This is required to ensure a complete assessment of route considerations has been provided. See advisory note 4.

ii. The route assessment identifies heavy-massed and large-axle group load vehicles. Bridge and culvert assessments are required for TfNSW assets to assess their suitability for use of these vehicle types. The proponent is to contact TfNSW Special Permits Unit (see advisory note 7). The route assessment is to be revised based on the outcomes of the TfNSW bridge and culvert assessments.

iii. The route study provided by ARES noted that the exact weights and dimensions of the Transformer are yet to be finalised, with guide dimensions offered. The maximum dimensions are to be provided in the updated route study.

iv. Pinch point 17 demonstrates that to make the turn into Canalla Road from the Riverina Highway, the high-risk OSOM will be entering into the opposing lanes. This will require traffic to be stopped; however, sufficient detail on how this will occur is not provided. The updated information will need to clarify how long traffic will be stopped (TfNSW notes traffic cannot be stopped for more than 10 minutes). Please include this detail in the updated TIA and ensure any other locations where traffic is required to be stopped are provided.

v. The route study demonstrates that medians will be tracked over, including at the intersection of the Newell Highway and Riverina Highway. See figure 1 within **Attachment B**. The proponent is to investigate whether the high-risk OSOM can avoid tracking over any medians or other infrastructure on the state road network.

vi. Strategic concept designs will be required for works required along the state road network (for example, the median identified in e) that identify the scope of the works that would be necessary to ensure the asset could be made suitable for traversing (i.e pavement strengthening) or temporary removal.

vii. 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.

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viii. Signs are proposed to be removed at the Riverina Highway / Newell Highway. Details on any temporary signage and the timeframe for replacing traffic signs are to be included.

ix. An extensive review of the high-risk OSOM routes regarding vertical and horizontal obstructions alignment, including existing formations, crossings, bridges, culverts, intersection roadside furniture, hazards, roundabouts, traffic signals, level crossings, existing developments, signage and powerlines.

x. The route assessment does not include relevant TfNSW projects or other third-party projects that are currently under construction, or will be completed, on the State road network for the route. The route assessment must be updated to include mitigation measures or modifications required to navigate any identified road or rail projects along the routes (ie, Council works for Finley Main St project expected to commence in the financial year 25/26, see figure in Attachment B for location of works).

xi. The pull-over bays and rest areas have been identified with swept paths; however, the diagrams provided aren't fully dimensioned as required. See advisory note 1 and 5.

xii. Rail requirements are to be considered. See advisory note 9 and 10.

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TfNSW Advisory Notes

1. Strategic concept designs are required for works along the state road network route. Strategic-Design-requirements-for-DA-Factsheet.pdf
2. Auxiliary Left Turn treatment must comply with Austroads Guide to Road Design Part 4A, Figure 8.3. See here: https://austroads.gov.au/publications/road-design/agrd04a
3. Basic Right Turn treatment must meet the requirements of Austroads Guide to Road Design Part 4A. Ensure the C value is compliant for road trains as part of figure 7.1.
4. The updated route study must include a reference to a Route ID utilising the NHVR portal website. Route Planner Tool.
5. The rest areas and pull over locations are required to be sufficient to comply with NHVR fatigue management requirements and any day or night time travel restrictions on the network.
6. Warrant assessments are to be in accordance with Section 3.25 of Part 6 of the Austroads Guide to Traffic Management.
7. Bridge assessments for TfNSW assets can be obtained by contacting spu@transport.nsw.gov.au.
8. 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.
9. It is noted that the Newell Highway section on the proposed OSOM Route crosses the non-operational CRN rail Corridor from Narrandera to Tocumwal at Tocumwal. if any adverse impacts to CRN corridors are identified, the applicant shall seek approvals from UGLRL and TfNSW. Please note that the applicant must adhere to the transport management and safety requirements of UGLRL and TfNSW for matters involving the CRN rail corridor.
10. 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.

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Attachment B

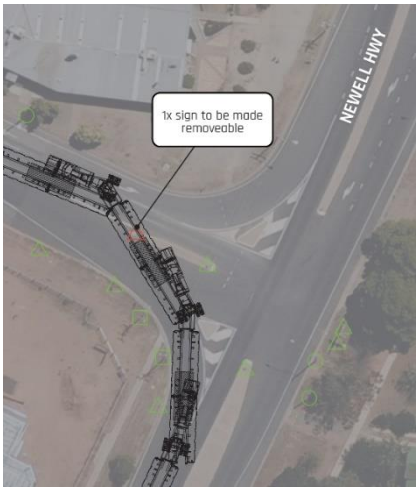
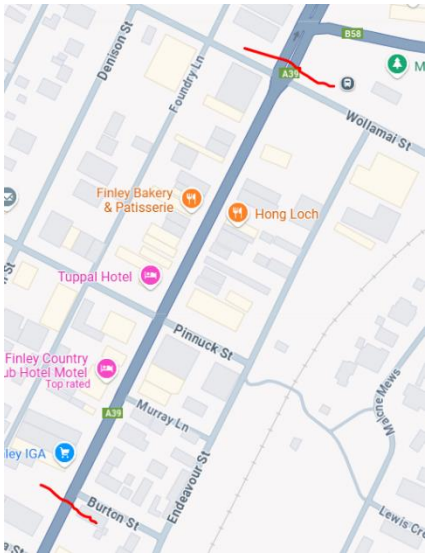


Figure 1 – Affected median, intersection of the Newell and Riverina Highways.



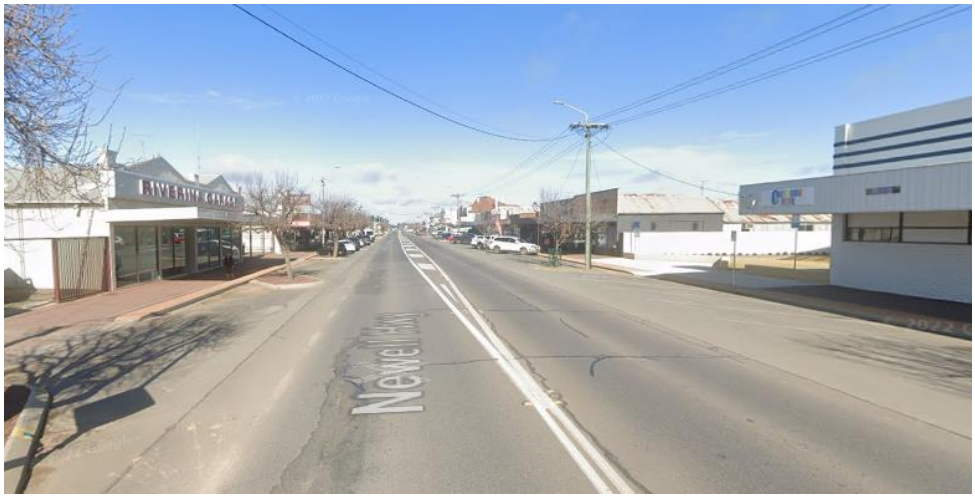


Figure 2 – Finley Main Street project works will be located on the Newell Highway between Wollamai St and Burton St. Works will include Pavement works around the parking areas, pedestrian crossing relocation and stormwater drainage works. An indication of the location is provided above, however consultation will need to occur with Council for the full extent of works.

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