

5 December 2025

TfNSW reference: REN25/00088/002

Your reference: SSD-77238990 (PAE-98480983)

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

Attention: Nicholas Kumar

**SSD-77238990, South Coree Battery Energy Storage System, 384 Broockmanns Road, Finley 2713;
Response to Environmental Impact Statement**

Dear Nicholas,

Transport for NSW (TfNSW) is responding to South Coree Battery Energy Storage System (BESS), exhibited from 7 November 2025 and referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by NGH Pty Ltd, dated 22 October 2025, and Traffic Impact Assessment (TIA) prepared by Amber Organisation, dated 10 October 2025, as key documents for preparing this response.

The information provided in the EIS (the TIA) does not demonstrate that the South Coree BESS has adequately addressed the project's proportionate impacts on the State Road network. TfNSW requests additional information to address the key issues raised below and detailed in Attachment A. This information must be addressed within a revised TIA and EIS (where applicable), to be submitted with the Response to Submissions (RtS).

Key issues:

1. Swept path assessments: Missing for design heavy vehicle.
2. Turn treatments and required road upgrades at Riverina Highway / Canalla Road intersection.
3. High-risk OSOM route assessment: Components of OSOM route assessment required.
4. Nearby bus stops and routes: Further on mitigation measures.
5. Pre-construction minor works: Staging to be clarified and traffic assessment to be completed.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment A**. If you have any questions, please contact Emily Lu, Development Services Case Officer, at 1300 019 680 or email development.renewables@transport.nsw.gov.au

Yours sincerely,



Alexandra Power
Manager Development Services - West
Transport Planning
Planning, Integration and Passenger

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Attachment A

SSD-77238990, South Coree Battery Energy Storage System, 384 Broockmanns Road, Finley 2713; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 5 December 2025 reference REN25/00088/002.

TfNSW additional information requested | TfNSW comments

TfNSW requests the additional information on the key issues identified and 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.

1. Key issue 1: Traffic assessments

a) Swept path assessments

Swept path assessments have not been completed for the design heavy vehicle (i.e. 26 metre B-double, as indicated in Section 4.21 of the TIA) at impacted State Road intersections, particularly the Riverina Highway/Canalla Road intersection, as Canalla Road is not an approved B-double access road.

Swept paths for the design vehicle are shown to indicate that there is no conflict with concurrent left-in/ left-out and right-in/right-out movements. Swept paths are to be produced in accordance with *Austrroads Design Vehicles and Turning Path Templates*.

b) Use of network peak hour in assessment

The traffic assessments, including the turn warrant assessments, use the traffic volumes of background and construction vehicles during the peak construction timeframe, i.e. 6am – 7am. To adequately assess the 'worst case scenario', the traffic volumes used must be the peak construction traffic at peak construction time (plotted on the x axis) and the peak background traffic at peak network time, i.e. the 6am – 7am construction traffic volumes plus 8am – 9am background traffic volumes (plotted on the y axis). The background network peak-hour volumes must include the annual growth rate applied linearly to the peak of construction, and the cumulative traffic volumes of other projects at EIS or the approved stage that would have a coinciding construction schedule and construction traffic present in the background through or turning volumes.

The traffic assessment assumptions and turn warrants assessment must be updated within the revised TIA. The strategic concept designs for the intersection of Riverina Highway/Canalla Road will need to be revised if a higher-order intersection treatment, beyond what is currently proposed (BAR/BAL), is warranted based on the revised turn-warrant assessment or provide alternative mitigation measures (i.e shuttle bus etc) to ensure that the project construction traffic volumes for the peak of construction can comply with the BAR/BAL intersection treatment.

If the turn warrants assessment is not updated to account for the 'worst case scenario' then the construction traffic will be restricted to the project peak hour and construction traffic will not be permitted within the network peak hour.

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2. Key issue 2: Turn treatments and required road upgrades at Riverina Highway / Canalla Road

The existing turn treatments are deficient as they do not comply with Austroads. 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 revised TIA.

a) Issue with existing Basic Right Turn (BAR) treatment

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 centreline to provide a widened shoulder to satisfy the requirement of a BAR (refer to *Austroads Guide to Road Design 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.

b) Other considerations

- iii) **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.
- iv) **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.
- v) **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*.

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3. Key issue 3: High-risk OSOM route assessment

- a) An NHVR Route ID is to be provided for each proposed OSOM route.
- b) Laden dimensions and weight of the vehicle configuration and loads are to be provided within the revised TIA. TfNSW requires these dimensions in order to complete a full assessment.
- c) The route assessment identifies heavy-massed and large-axle group load vehicles. Bridge and culvert assessments are required for TfNSW assets and can be obtained by contacting TfNSW Special Permits Unit via spu@transport.nsw.gov.au. The result of bridge assessments may require a change to the route which must be accounted for in the updated route assessment.
- d) Consider the level of escort required for the high-risk OSOM. A police escort may be required for high-risk OSOM traversing multiple lanes, as shown in the provided swept paths.
- e) The route study demonstrates that medians will be tracked over, including at the intersection of the Newell Highway and Riverina Highway. The proponent is to investigate whether the high-risk OSOM can avoid tracking over any medians or other infrastructure on the state road network.
- f) A light / power pole has been indicated to fall within the 0.5m vehicle clearance zone at the Newell Highway / Riverina Highway intersection, see Figure 1.

4. Key issue 5: 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, as required by TfNSW's Response to Secretary's Environmental Assessment Requirements (SEARs).

- a) 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.
 - 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.
 - v) The AM/PM peak hour must be consistent with the traffic volumes that would be generated during this period by the existing land use. Avoid network peak hours where possible.
 - vi) Include measures to inform the community and key stakeholders of the increased traffic during this period.
 - vii) Identify any temporary widening or works that may be required to accommodate swept paths for the design vehicle during this period within a strategic concept design.
 - viii) No OSOM will be permitted during this period, unless swept paths are provided that demonstrate that the intersection or access will be able to accommodate the turn of the OSOM movement within the existing pavement.

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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. 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.
3. The updated route study must include a reference to a Route ID utilising the NHVR portal website. Route Planner Tool.
4. Bridge assessments for TfNSW assets can be obtained by contacting spu@transport.nsw.gov.au.
5. 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.
6. 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.
7. If the proponent requires the use of UGLRL assets, the applicant must consult with UGLRL. This can be done through lodgement 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 lodgement of the request.

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