

15 December 2025

TfNSW reference: REN25/00195/001

Your reference: SSD-75680468 (PAE-99771216)

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Attention: Rita Hatem

SSD-75680468, Stoney Creek Battery Energy Storage System, 41 Stoney Creek Road, Narrabri; Response to Environmental Impact Statement

Dear Rita,

Transport for NSW (TfNSW) is responding to Stoney Creek Battery Energy Storage System (BESS), exhibited from 20 November 2025 and referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by SLR Consulting, dated 30 October 2025, and the Traffic Impact Assessment (TIA) prepared by SLR Consulting, dated 21 October 2025, as key documents for preparing this response.

The information provided in the EIS does not demonstrate that Stoney Creek BESS has mitigated traffic safety, efficiency, or risks to TfNSW assets on the State road network. TfNSW requests additional information on the key issues identified below and as detailed in Attachments **A and B**, to form part of a revised TIA and EIS, to be submitted with the Response to Submissions (RtS).

Key issues:

1. The Oversize Overmass (OSOM) Route Assessment does not provide sufficient information.
2. Traffic assessments, such as turn treatment warrants, have not been conducted for State road intersections. Clarification on assumptions used is also required.
3. Rail crossings used for OSOM transport are to be assessed.
4. Construction timeframes are unclear, including pre-construction works.

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

A/ Manager Development Services – West

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Attachment A

SSD-75680468, Stoney Creek Battery Energy Storage System, 41 Stoney Creek Road, Narrabri; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 1515 December 2025 reference REN25/00195/001.

TfNSW additional information requested | TfNSW comments

TfNSW requests that the additional information on the key issues identified, as detailed below, 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, either as a document with tracked changes or as a table in the updated TIA detailing the changes.

1. Key issue 1: High risk Oversize Overmass (OSOM) Route Analysis

The OSOM Route Analysis provided does not provide sufficient information for TfNSW's review. Requirements for the OSOM Route Analysis, which mirror TfNSW's Response to SEARs, have been provided in Attachment B of this response.

- a) The revised TIA must include a comprehensive OSOM route analysis from origin to site, which addresses the requirements stated in Attachment B, including swept paths for all pinch points along the State road network.
- b) The number of high-risk OSOM trips and respective routes is to be clarified in the revised TIA.

2. Key issue 2: Traffic Assessment

a) Assumptions and traffic volumes used:

- i. Peak construction traffic times are to be clearly stated within the revised TIA.
- ii. The ratio of light and heavy vehicles is currently unclear due to the groupings of 'Construction Material Delivery Trips' and 'Workforce Trips', as provided in Table 16. Vehicle movements are to be clearly delineated as light vehicles or heavy vehicles within the revised TIA. Shuttle buses are also to be considered as heavy vehicles, given the dimensions provided within Section 3.3.6.2.
- iii. Shuttle bus occupancy numbers are to be clarified within the revised TIA. There is currently a discrepancy between the numbers provided within Tables 12 and 15 of the TIA.

b) Turn warrant assessment: Turn warrant assessments have not been prepared for State road intersections.

- i. A turn warrant assessment for different scenarios (i.e project peak hour is different to network peak hour, for worst case scenario (i.e overlap of stages of the construction such as pre-construction works, staging of occupation of workforce accommodation camp and other components of the construction process) is to be included within the revised TIA.
- ii. The turn warrant assessments are to be prepared in accordance with section 3.25 of Part 6 of the Austroads Guide to Traffic Management. A turn warrant assessment will be required for each scenario identified above and for each access, access track and any other access along the project's identified routes with an interface or connection to the state road network.

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- iii. The methodology to be used for the turn warrants assessment is:
 - AM/PM peak project traffic volumes (including turn direction and traffic type ratios),
 - Applied to existing AM/PM network peak background traffic,
 - Include linear growth to the year of peak construction.
 - Including the cumulative traffic volumes for projects at EIS and approved stages that will be present in the background and turning traffic volumes at the site access or intersection.

3. Key issue 3: Rail crossings

- a) The amended EIS documents should include detailed Heavy Vehicle and OSOM route information (for both construction and operation traffic) at the crossings listed below, as well as any other identified crossings on CRN corridors.

Proposed access route from the Port of Newcastle to the site

This route will cross the CRN rail corridor at one (1) location:

- i. Newell Highway route crossing public vehicle level crossing, and CRN operational rail corridor from Narrabri Jct to Burren at Narrabri NSW

Proposed access route from Glen Waverly to Site

The proposed access route from Glen Waverly will cross CRN rail corridor at six (6) locations:

- i. Newell Highway route crossing overbridge and CRN operational rail corridor from Junee to Narrandera, at Narrandera NSW
 - ii. Newell Highway route crossing public vehicle level crossing, and CRN operational rail corridor from Temora to Griffith at Mirrool NSW
 - iii. Showground Road route (Newell Highway) crossing public vehicle level crossing and CRN operational rail corridor from Barmedman to West Wyalong at West Wyalong NSW
 - iv. Newell Highway route crossing public vehicle level crossing and CRN operational rail corridor from Molong to Parkes at Parkes NSW
 - v. Newell Highway route crossing public vehicle level crossing and CRN operational rail corridor from Dubbo to Coonamble, at Gilgandra NSW
 - vi. Newell Highway route crossing public vehicle level crossing, and CRN operational rail corridor from Narrabri Jct to Burren at Narrabri NSW
- b) If the applicant intends to use UGLRL-managed assets or infrastructure for OSOM/heavy vehicles, including crossings, for OSOM or heavy vehicle movements, a permit request must be submitted via the **National Heavy Vehicle Regulator (NHVR)**. The request must include detailed specifications of the OSOM or heavy vehicles, including axle loadings, axle spacings, and overall vehicle dimensions.

4. Key issue 4: Construction timeframes, including pre-construction/establishment minor works

- a) Expected construction commencement is unclear within the current TIA. This is to be clarified within the revised TIA.
- b) The timeframe of pre-construction/establishment works is unclear within the current TIA. The updated TIA is 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.

The proponent is to provide a separate analysis of pre-construction minor works to the construction analysis. This should include the list of requirements as provided in TfNSW's Response to Secretary's Environmental Assessment Requirements (SEARs), including:

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- i. Identify the AM/PM peak hour and proposed traffic volumes during this period.
- ii. Identify measures to reduce the project traffic and impacts during this period i.e carpooling, shuttle buses, staggering of traffic.
- iii. Identify mitigation measures to monitor and enforce the traffic volumes during this period.
- iv. Provide a schedule of the proposed pre-construction minor works and program of works.
- 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 the hours for pre-construction minor works.
- viii. Identify the traffic volumes for any temporary workforce accommodation that will be occupied during this period.
- ix. Any overlap of construction and pre-construction minor works periods must be included in the traffic assessment for this stage, prior to completion of the intersection upgrade.
- x. Temporary traffic controls will not be permitted to be used at the intersection or access point for pre-construction minor works that is occurring before commencing the required road upgrades.

TfNSW Advisory notes

1. Strategic concept designs are required for works along the state road network route. [Strategic-Design-requirements-for-DA-Factsheet.pdf](#)

Attachment B

SSD-75680468, Stoney Creek Battery Energy Storage System, 41 Stoney Creek Road, Narrabri; Response to Environmental Impact Statement

Concept Level Route Analysis required for High Risk OSOM

1. The 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 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.

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- i. 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).
- j. Include any surveys or pavement investigations as part of the high-risk route analysis.
- k. Identify and assess implications of any road and rail projects under construction during the indicative schedule for project related OSOM movements.
- l. Identify any rail level crossing along the route.
- m. 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.

- n. Advise if pilot or police will be escorting the high-risk OSOM loads identified within the high-risk OSOM route analysis, noting travel into opposing lanes or contraflow cannot be managed by pilots.

Note: It is the responsibility of the project to include any further road upgrades if the high-risk OSOM cannot be delivered within the design envelope for the Port to REZ project.

Note: NHVR permits do not cover road works or upgrades and environmental approvals required
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