

1818 December 2025

TfNSW reference: REN25/00089/002

Your reference: SSD-77527735 (PAE-99771471)

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

Attention: Pragma Mathema

**SSD-77527735, Mangoplah Battery Energy Storage System, 4178 Holbrook Road, Mangoplah NSW 2652;
Response to Environmental Impact Statement**

Dear Pragma,

Transport for NSW (TfNSW) is responding to Mangoplah 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 NGH Pty Ltd, dated 5 November 2025, and the Traffic Impact Assessment (TIA) prepared by Amber Organisation, dated 20 October 2025, as key documents for preparing this response.

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

Key issue:

1. The Oversize Overmass (OSOM) Route Assessment does not provide sufficient information.

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
Transport Planning
Planning, Integration and Passenger

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Attachment A

SSD-77527735, Mangoplah Battery Energy Storage System, 4178 Holbrook Road, Mangoplah NSW 2652; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 18 December 2025 reference REN25/00089/002.

TfNSW comments

TfNSW requests the additional information of the key issue identified and as detailed below to be included in a revised TIA 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 where and what changes have been made.

1. Key Issue 1: Oversize Overmass (OSOM) Vehicle Route Assessment

- a. Laden dimensions and axle masses of OSOM vehicles are to be provided within a revised TIA to enable TfNSW to conduct a detailed route assessment.
- b. Bridge and culvert assessments are required prior to development consent, as route changes may be required because of assessment findings. Contact spu@transport.nsw.gov.au to request a bridge assessment of TfNSW assets.
- c. The swept paths provided indicate that the OSOM traverses outside of the marked pavement at Rest Area 5 on the Hume Highway, see Figure 1. Swept paths are to be updated to demonstrate that OSOM movements can occur within the marked roadway, or strategic concept designs are to be provided with road and/or shoulder widening pavement designs. [Strategic-Design-requirements-for-DA-Factsheet.pdf](#)
- 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.

2. Advisory comment: Planned TfNSW rehabilitation works on Hume Highway

TfNSW advises that pavement rehabilitation works are planned on the Hume Highway north of Albury. The approximate delivery schedule is:

- April 2026 – June 2026
- September 2026 – December 2026
- September 2027 – March 2028.

The Applicant is to contact CNC.South@transport.nsw.gov.au prior to any OSOM vehicle movements through this location.

3. Advisory comment: Site Access Point on Holbrook Road (Regional Road)

TfNSW recommends the Applicant consider the following regarding Holbrook Road site access point in consultation with Council:

- a. Swept path analysis shows B-double vehicles tracking over the centreline, presenting a potential hazard to vehicles stored at the intersection. Consider revising the intersection geometry and widening.
- b. Consider the reinstatement of existing defined table drains throughout the existing formation.

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- c. The typical cross-section proposes a maximum of 4:1 batter slope. TfNSW recommends a 6:1 batter slope, as stated in *Austrroads Guide to Road Design Part 6*, noting that anything steeper than 4:1 is to be protected by a safety barrier.

Figures:

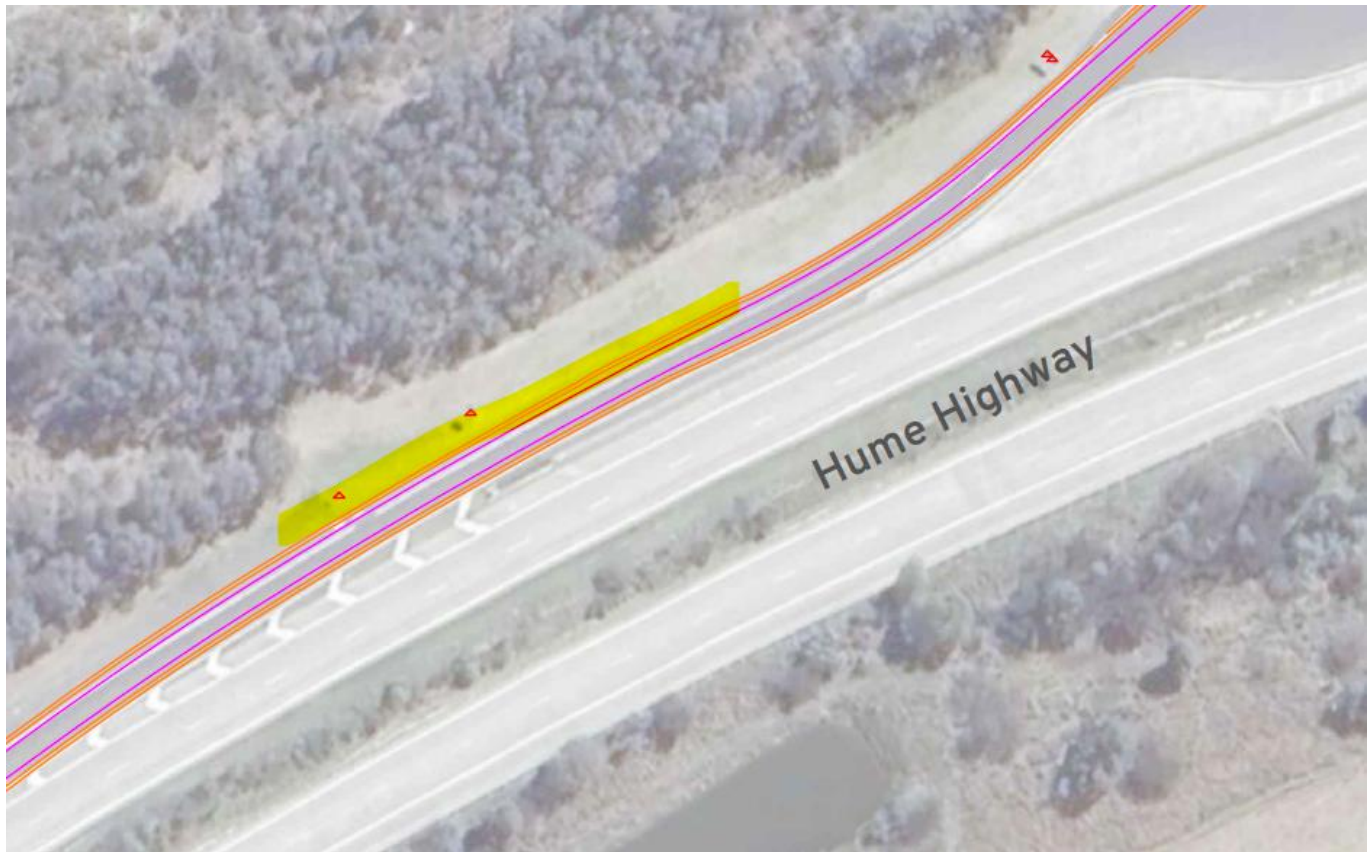


Figure 1: Vehicle outline beyond paved road area (indicated with yellow highlight) at Rest Area 5. Source: Figure RA5 of OSOM Vehicle Route Assessment.

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