

24 December 2025

TfNSW reference: REN25/00067/009

Your reference: SSD-85372970

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

**Attention: Pragma Mathema**

**SSD-85372970 - Griffith Battery Energy Storage System; 15 Bob Irvin Road, Yoogali; Griffith City Council; Response to Environmental Impact Statement**

Dear Pragma,

Transport for NSW (TfNSW) is responding to the exhibition of the Griffith BESS, which was exhibited on 20 November 2025 and was referred via the Major Projects Portal.

TfNSW has reviewed the Environmental Impact Statement (EIS) prepared by cogency dated 12 November 2025 and the Traffic Impact Assessment (TIA) prepared by Onemilegrid dated 12 November 2025, as key documents for preparing this response.

The information provided in the EIS does not demonstrate that the project 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 (where applicable), to be submitted with the Response to Submissions (RtS).

**Key Issues:**

1. Further assessment is required for proposed access intersections;
2. Further information regarding the transmission line traversing the highway;
3. Further detail regarding the high-risk Oversize Overmass vehicle routes required.

On request, TfNSW can meet with DPHI and the Applicant to discuss the information in **Attachment A**. 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](mailto: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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**SSD-85372970 - Griffith Battery Energy Storage System; 15 Bob Irvin Road, Yoogali; Griffith City Council; Response to Environmental Impact Statement**

This attachment relates to TfNSW’s response dated 24 December 2025 reference REN25/00067/009

**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.

No.	TfNSW comments from EIS requiring RFI
<b>Key Issue 1 – Access Intersection Assessments</b>	
	<p>Figure 17 of the TIA proposes utilising a four-state road intersection as part of the project's construction traffic routes; each intersection must assess the traffic requirements stated in TfNSW's SEAR response to the proposed project. Currently, the TIA only addresses the four-way intersection of <u>Irrigation Way / Bob Irvin Way</u>; however, an assessment of <u>Kidman Way/Hanwood Avenue</u>, <u>Murray Road / Irrigation Way</u> will also need to be provided.</p> <p>The following further assessment is required for <u>Kidman Way/Hanwood Avenue</u> and <u>Murray Road / Irrigation Way</u>:</p> <ol style="list-style-type: none"> <li>a) Swept paths are required, demonstrating the largest vehicle to use the intersection. Must be prepared in accordance with <i>Austroads Design Vehicles and Turning Path</i></li> <li>b) A turn warrant assessment for different scenarios (i.e project peak hour is different to network peak hour, for the worst case scenario (i.e overlap of construction, pre-construction works and occupation of stages of workforce accommodation camp).</li> </ol> <p>The turn warrant assessments are to be prepared in accordance with section 3.25 of Part 6 of the <i>Austroads Guide to Traffic Management</i>. 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.</p> <p>The methodology to be used for the turn warrants assessment is:</p> <ul style="list-style-type: none"> <li>• Applied to existing AM/PM network peak background traffic,</li> </ul>

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	<ul style="list-style-type: none"> <li>• Include linear growth to the year of peak construction.</li> <li>• 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.</li> </ul> <p><i>Note: In rural agricultural areas, harvest periods must be factored into traffic analyses and turn-warrant assessments.</i></p> <p><i>Note: SIDRA Analysis may be required in locations with higher populations, accesses, or intersections used by other existing high traffic-generating land uses or accesses that are located close to railway lines or traffic signals.</i></p> <p>c) TIA is to detail the required intersection treatments and scope of upgrades at each intersection and proposed access point and must be designed to facilitate the traffic volumes and safe turning of project traffic for each identified access or intersection with the State Road network. All <u>strategic concept designs</u> must be developed to demonstrate compliance with Austroads, TfNSW supplements, and TfNSW technical directions.</p> <p>The list below (but not limited to) is provided to assist with common questions and issues that may arise with the preparation and review of strategic concept design for renewable projects, and is provided as helpful tips to assist in the preparation of the strategic concept design.</p> <ul style="list-style-type: none"> <li>• The <u>2D section of the TfNSW strategic concept design fact sheet</u> will inform the level of detail required to be captured within the strategic concept designs for each access or intersection that is required to be upgraded.</li> <li>• The posted speed zone +10km/hr is the design speed that is to be used to inform the strategic concept designs.</li> <li>• Typical sections are to include drainage detail.</li> <li>• Sealed shoulder width requirements are informed by the Average Annual Daily Traffic volumes (AADTs), which will be obtained from the traffic count data collected within the traffic count survey.</li> <li>• Road train gazetted routes will need to incorporate additional widening within the design of the intersection treatments refer to the relevant intersection treatment type within <i>Austroads Guide to Road Design Part 4A</i>.</li> <li>• Consideration of radii and adjustment for crests and curved road geometry.</li> <li>• Pavement widening for high-risk OSOM is to be consistent with the existing pavement of the state road network.</li> </ul> <p><i>Note: It is the proponent’s responsibility to acquire and dedicate land required to accommodate road infrastructure including, but not limited to, footways, structures, stormwater drainage, batters, maintenance access and utilities.</i></p> <p><i>Note: <u>Works Authorisation Deeds</u> are required for intersection upgrades on the state road network.</i></p> <p><i>Note: TfNSW is not the landowner of the state road network. The relevant council is the landowner of the state road network (with the exclusion of freeways).</i></p>
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	<p>Note: There are several other road connections to the state road network that have the potential to be used for traffic to the site. The TIA must declare if others will be used, for example, as emergency access and assess them for impacts if required. If not, the TIA must declare that no others will be used.</p> <p>d) For the intersection of Bob Irvin Road / Irrigation Way and Murray Road / Irrigation Way, the culvert over the irrigation channel needs to be understood for its capacity to withstand the load of the trucks travelling over the top. The culvert is within the state road reserve; however, consultation with Council and Murrumbidgee Irrigation Ltd is to occur for the intersection of <u>Irrigation Way / Bob Irvin Road</u>:</p> <p>e) Swept path diagram indicates that simultaneous forward entry and exit is not possible. Mitigation measures to prevent ingress of vehicles from Irrigation Way is to be detailed and included within the TMP.</p> <p>f) The 19 metre semi-trailer swept path analysis shows the left turn movement crossing the centreline of Irrigation Way. The swept path also demonstrates tracking off the pavement near the unprotected MI channel. Left-turning movements onto the state road network must be contained within the lane and must not cross the state road centreline.</p> <p>For <u>all</u> intersections:</p> <p>g) Raw traffic data for all intersections is to be provided as an appendix.</p> <p>h)</p>
<p>3.</p>	<p><b>Pre-Construction Minor Works</b></p> <p>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. The paragraph analysis in Section 4.2 is not sufficient. This should include the list of requirements provided by the SEARs, including:</p> <p>a) 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.</p> <p>b) 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.</p> <p>c) Provide a schedule of the proposed pre-construction minor works and program of works. Identifying the hours for pre-construction minor works.</p> <p>d) 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.</p>
<p><b>Key Issue 2 – Transmission Line crossing Irrigation Way (state road)</b></p>	

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4.	<p>The project identifies Electricity Transmission Lines will cross state road Irrigation Way however, Table 7, notes that the decision for above or below ground cabling is yet to be determined. The proponent should clarify which option is being chosen and provide sufficient detail to support the proposal. With respect to this matter, the following information is required:</p> <ul style="list-style-type: none"> <li>a) The heights or depths (under boring) and the vertical and horizontal clearances (overhead) in accordance with Austroads.</li> <li>b) The method for the construction of the transmission lines across the state road network, inclusive of any proposed hurdles or other temporary infrastructure.</li> <li>c) location of infrastructure and impacts (excavation or fill) relative to the road reserve, including demarcation of local and state-classified road reserves.</li> <li>d) Distance from road reserve if the transmission line is to be constructed in parallel to the state road network.</li> <li>e) Access required to construct and maintain the infrastructure. Access points or access tracks required for ETLs or other infrastructure will require the same level of assessment as detailed above.</li> <li>f) Any trenchless excavation of the pipeline or any transmission lines near or crossing the State road network must comply with TfNSW Technical Direction-Geotechnical (GTD208-002) for Trenchless Excavation within the Road and Maritime Infrastructure.</li> <li>g) Strategic concept designs must be provided for each transmission line crossing the state-road network.</li> </ul>
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**Key Issue 3 – The high-risk OSOM route assessment scope and mitigation measures**

5.	<p>The proponent has confirmed in Table 9 that high-risk oversized overmass (OSOM) vehicles are required. Detail regarding these movements 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. This should include:</p> <ul style="list-style-type: none"> <li>a) The high-risk OSOM laden loads, class and vehicle configuration must include the following information regarding the dimensions, weight and length: <ul style="list-style-type: none"> <li>• Overall dimensions (width, height and length) of the <b>laden</b> load (laden load is the vehicle combination and the load to be transported),</li> <li>• Total weight of laden load,</li> </ul> </li> <li>b) Swept paths for pull-over bays / rest areas along high risk OSOM routes (including GPS coordinates) that demonstrate that high risk OSOMs can be physically accommodated for the project (in terms of size, width and accessibility).</li> <li>c) Bridge Assessments for any at risk bridges on classified roads due to dimensions and weight of OSOM vehicles, contact <a href="mailto:spu@transport.nsw.gov.au">spu@transport.nsw.gov.au</a> to request a bridge assessment of TfNSW assets.</li> </ul>
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	<p>d) Highlighting each at-risk road structures that the haulage route crosses. There are locations on the provided route study that require further information:</p> <ul style="list-style-type: none"> <li>- corner of Sturt Highway and Newell that appear to demonstrate the wheels tracking over the concrete median. It must be clarified if these wheels are tracking on the median. If so, strategic concept designs for works will be required. See Appendix 2.</li> <li>- Formation widening will be required at the intersection of Hanwood Avenue and Bob Orvin Road. It is noted that the swept path analysis shows the OSOM vehicle tracking within 0.5m of the existing power pole and within 0.5m of drainage infrastructure. Strategic plan required for this location.</li> </ul> <p>Height Restrictions:</p> <ul style="list-style-type: none"> <li>- University Avenue Bridge over F6 – Min Clearance 4.6m</li> <li>- Bridge on Gipps Rd over F6 West Wollongong – Min Clearance 5m</li> <li>- Bridge over F6 Reserve Street – Min Clearance 5.3m</li> <li>- Pedestrian Bridge over F6, Near Byarong Ave – Min Clearance 5.3m</li> <li>- Bridge on Sierra St over Hume Hwy, Yerrinbool – Min Clearance 6.2m</li> <li>- Bridge on Church Ave – Min Clearance 5.3m</li> <li>- Bridge over F6 – Mt Keira Rd – Min Clearance 5.4</li> <li>- Bridge on MR 602 Over F6 at Figtree, Min Clearance 5m.</li> <li>- Bridge on MR 602 over F6 at St Thomas – The Avenue Bridge – Min Clearance 5.3m</li> <li>- N/b Load Ramp over SH2 – Min Clearance 5.2m</li> <li>- Railway Bridge over HW14, Wagga Wagga – Min Clearance 5.23m</li> <li>- Bridge over SHE2, Avon Dam Road at Bargo – Min Clearance 5.6m</li> <li>- MWS &amp; DB Pipeline, Bridge over SH2 at Avon Dam Rd – Min Clearance 5.7m</li> <li>- Bridge on Drapers Rd over SH2 at Willow Vale – Min Clearance 5.6m</li> <li>- W/B Roundabout, Bridge over SH2, West of Goulburn, Bridge B – Min Clearance 5.4m</li> <li>- Bridge on MR52, South of Goulburn at Gunning – Sutton Road Overbridge – Min Clearance – 5.8m</li> <li>- Bridge over HW2 Hume, South of Goulburn at Coolalie Road – Min Clearance 5.34m</li> <li>- Bridge over HW2 Hume, 84km South of Goulburn – Min Clearance 5.33m</li> <li>- Pedestrian Bridge at University over F6 at Gwynneville – Min Clearance 5.10m</li> <li>- Bridge on SH14 W/8 over HW2 Hume, Interchange – Min Clearance 5.7m</li> <li>- Interchange Bridge over HW2 Hume, Interchange – Min Clearance 5.73m</li> <li>- Nan – Min Clearance 5.2m</li> <li>- Bridge over HW2, Hume West St Gundagai – West St Interchange – 5.27m</li> </ul> <p>e) 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).</p> <p>f) Identify and assess implications of any road and rail projects under construction during the indicative schedule for project related OSOM movements. For example, the Mt Ousley Interchange is a notable project along the route.</p> <p>g) Identify any rail level crossing along the route.</p>
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	<p>h) 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.</p> <p><i>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.</i></p>
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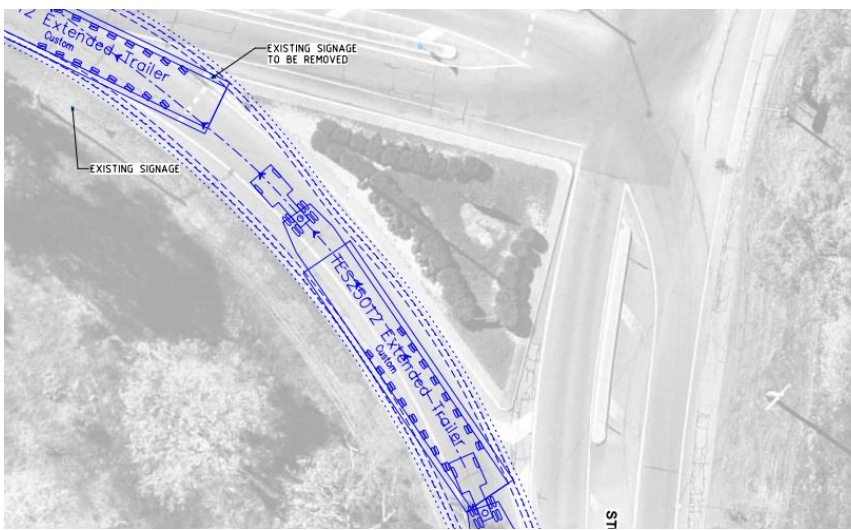
**TfNSW Advisory Notes**

1. The route study must include a reference to a Route ID utilising the NHVR portal website. [Route Planner Tool](#).
2. Strategic concept designs are required for works along the state road network route. [Strategic-Design-requirements-for-DA-Factsheet.pdf](#)
3. Turn treatment upgrades must meet the requirements of Austroads Guide to Road Design Part 4A. See here: <https://austroads.gov.au/publications/road-design/agrd04a>
4. Turn warrant assessments are to be in accordance with Section 3.25 of Part 6 of the Austroads Guide to Traffic Management.
5. Bridge assessments for TfNSW assets can be obtained by contacting [spu@transport.nsw.gov.au](mailto:spu@transport.nsw.gov.au).
6. 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.
7. If the proponent requires the use of UGLRL assets, the applicant must consult with UGLRL. This can be done by lodging a request for a permit via the National Heavy Vehicle portal, or directly to UGLRL at “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.

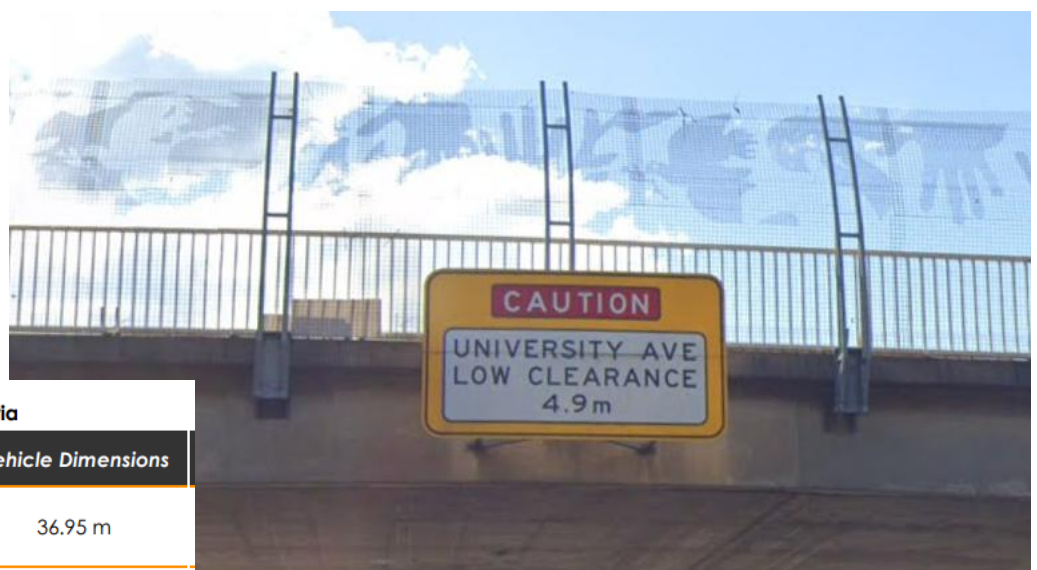
Attachment B

**SSD-85372970 - Griffith Battery Energy Storage System; 15 Bob Irvin Road, Yoogali; Griffith City Council; Response to Environmental Impact Statement**

**Figure** – Wheels tracking over the concrete median – corner of Sturt / Newell



**Figure** – University Avenue Bridge Wollongong – Project vehicle exceeding height restriction



**Table 9 OSOM High Risk Criteria**

Criteria	Vehicle Dimensions
Length	36.95 m
Height	6.4 m

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Figure - Other Height Clearance Issues along route -

Vertical Clearance Alert			ridge lumber	Bridge Description	Minimum Vertical Bridge Clearance	Bridge Number	Bridge Description	Minimum Vertical Bridge Clearance
624	BRIDGE OVER F6, AT UNIVERSITY AVE, AT GWYNNEVILLE - UNIVERSITY AVENUE	4.60	29	PEDESTRIAN BRIDGE, OVER F6, NEAR BYARONG AVENUE	5.30	8019	BRIDGE ON DRAPERS ROAD, OVER SH2 AT WILLOW VALE, 118.2KM SOUTH OF SYDNEY	5.60
625	BRIDGE ON GIPPS RD, OVER F.6, AT WEST WOLLONGONG - GIPPS ROAD BRIDGE	5.00	70	BRIDGE ON SIERRA ST, OVER HUME HIGHWAY, AT YERRINBOOL	6.20	8114	W/B ROUND-ABOUT, BRIDGE OVER SH2, WEST OF GOULBURN - BRIDGE B	5.40
626	BRIDGE OVER F6, RESERVE STREET, AT WEST	5.30	71	BRIDGE ON CHURCH, AVENUE OVER SH2, AT ALPINE	5.30	8160	BRIDGE ON MR52, OVER SH2 46.3K STH OF, GOULBURN AT GUNNING - SUTTON ROAD OVERBRIDGE	5.80
10825	BRIDGE OVER THE, HUME HIGHWAY, AT MARULAN	5.30	59	BRIDGE OVER, F6 - MT KEIRA RD, AT WEST WOLLONGONG - MT KEIRA RD BRIDGE	5.30	8203	BRIDGE, OVER HW2 HUME, 78.44KM S GOULBURN - COOLALIE RD	5.34
<a href="#">Download UGL and Sydney Trains result files (ZIP)</a>			52	BRIDGE ON MR 602, OVER F.6, AT FIGTREE - MASTERS ROAD BRIDGE	5.00	8208	BRIDGE, OVER HW2 HUME, 84.95 KM S GOULBURN	5.33
			53	BRIDGE ON MR 602, OVER F.6, AT MT.ST.THOMAS - THE AVENUE BRIDGE	5.30	8334	PEDESTRIAN BRIDGE, AT UNIVERSITY OVER F6, AT GWYNNEVILLE	5.10
			311	N/B LOAD RAMP, OVER SH2 - S/B, AT SH3 INTERCHANGE	5.20	8431	BRIDGE ON SH14 W/B, OVER HW2 HUME, INTERCHANGE	5.70
			6714	RAILWAY BRIDGE, OVER HW 14, WAGGA WAGGA - EDWARD STREET	5.23	8941	INTERCHANGE BRIDGE, OVER HW2 HUME, STH GUNDAGAI - CROSS STREET	5.73
			7271	BRIDGE OVER SH2, AVON DAM ROAD, AT BARGO	5.60	9197	NaN	5.20
			7275	MWS & DB PIPELINE, BRIDGE OVER SH2, AT AVON DAM RD	5.70	10031	BRIDGE, OVER HW2 HUME, WEST ST GUNDAGAI - WEST ST INTERCHANGE	5.27

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