Transport for NSW

21 February 2026

TfNSW reference: REN25/00118/004
Your reference: SSD- 78100252

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

Attention: Nicholas Kumar

SSD - 78100252, Willavale Battery Energy Storage System - Various Lots, Goulburn Mulwaree Council; Response to Environmental Impact Statement

Dear Nicholas,

Transport for NSW (TfNSW) is responding to the exhibition of the Willavale Battery Energy Storage System that was referred via the Major Projects Portal.

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

The information provided in the EIS does not demonstrate that the project 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 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 the state road intersections,
2. Detail regarding the high-risk Oversize Overmass vehicle routes,

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.

Yours sincerely,

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

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Attachment A

SSD - 78100252, Willavale Battery Energy Storage System - Various Lots, Goulburn Mulwaree Council; Response to Environmental Impact Statement

This attachment relates to TfNSW's response dated 21 February 2026 reference REN25/00118/004

Additional information requested | TfNSW comments

TfNSW requests that the additional information on the key issues identified 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 via a tracked-changes document or a table in the updated TIA detailing the changes, including where and what they are.

No.	TfNSW comments from EIS requiring RFI
	Key Issue 1 – State Highway Intersections
1.	The application is proposing to access the project via the intersection of Hume Highway / Wollogorang Road. The high background traffic volumes along the Hume Highway in this location and the identification of this stretch of Highway as a 'Black Spot' warrant further detailed analysis from a safe systems perspective within a further revision to the TIA in relation to the Hume Highway/Wollogorang Road for TfNSW to understand the projects proportionate safety risks to the state road network, before TfNSW can provide further direction on advising on what further scope of road upgrades or mitigation measures will need to be employed to manage the projects safety risks at this intersection and to background traffic travelling within the Hume Highway through lanes. • The swept path diagrams do not show that the cross-over location between the southbound and eastbound lanes can safely store the project vehicle without it overhanging into the through lanes. • Figure 2.2 states that there is adequate storage for a 19m semi however TfNSW has calculated approx. 16 metres from the hold line to the hold line and around 19 metres from the edge line to edge line. This presents a significant safety risk and leaves little margin for error. • The project vehicle swept path does not demonstrate that the middle crossover can fit vehicles simultaneously turning right into the crossover from eastbound and right out of the crossover, to head eastbound. Similarly, because there is no eastbound acceleration lane, the swept path shows the vehicle crossing into both eastbound lanes during the merge. This poses a safety risk due to the speed differential between a turning vehicle and oncoming traffic. The proponent will therefore need to reconsider this arrangement.

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- Table 7 Sheet 31 appears to also demonstrate 26m B Doubles will be used during the construction period; however, no swept paths have been provided for this vehicle. TfNSW notes that this vehicle would not be able to shelter safely within the crossover on the Hume Highway when making a right turn out from Wollogorang Road.
- The storing bay for the right out at the crossover is deficient and would likely need an acceleration bay on the right out.
- Measurements provided on plan 06-SD for the intersection of Hume Highway and Wollogorang Road are incorrect. TfNSW has conducted a site inspection and measured the shoulder to be 2m wide from the edge of the lane to the face of the guardrail, and the through lanes to be only 3.4m wide. Therefore, there is only 5.4m available for the "BAL", not 6m as shown in Figure 20, page 48, which doesn't comply with Austroads requirements. The proponent is to reconduct measurements at the site and propose adjustments to ensure compliance with Austroads for any proposed treatments, this could include adjustments to the guardrail and widening of the shoulder.

Considering the issues raised above the proponent is to investigate utilising another connection to the state road or a left in/left out turning restriction and the identification of a suitable turnaround location for vehicles travelling east (for example, at Gunning the Remembrance Drive interchange) along with appropriate upgrades to the intersection, particularly for merging vehicles (for example, an acceleration lane for the left turn out of Wollogorang Road onto the Hume Highway

The following further information is to be addressed to assist TfNSWs understanding of the risk of the merging heavy vehicle traffic merging comfortably into the through lanes of the Hume Highway for the left out from Wollogorang Road onto the Hume Highway, to address whether an acceleration would be required:

- Updated SIDRA with a clear diagram demonstrating which turns have been modelled. This should include all background traffic included, not just construction traffic.
- Clear modelling of the gap acceptance for both light and heavy vehicles in regards to the left turn out to avoid use of the deficient Hume Crossover.
- Complete a safety assessment of what is needed at the intersection from a Safe Systems approach and Investigation if an acceleration lane is required for the left out.
- Clarification on how soft mitigations are intended to work. If the proponent is proposing to reduce construction peak hour volumes, full compliance will be required and detailed commitments on how this will be met. Clarification if any other hours are to be used in excess of what as provided in the TIA.
- A typical cross section diagram will need to be provided for the Hume Highway / Wollogorang Road intersection demonstrating the full extent of drainage

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	requirements. TfNSW notes that behind the guardrail mentioned in the past point (roughly 1.3m behind) there is a concrete V drain and 3x750mm pipes under the highway, with a headway 3 metres behind the guardrail. The proponent is ensure the design considers these and advise if the footprint of the proposed scope of the design will require augmentation of the drainage infrastructure to achieve compliance with Austroads. t. • The photographs of the Safe Intersection Sight Distance (SISD) provided in Figure 22 do not demonstrate unobstructed views. The proponent is to confirm if tree trimming is required to achieve the appropriate SISD.
3.	**Mitigation Measures** Further details on all soft mitigation measures proposed to reduce traffic volumes must be clearly stated and quantified in the TIA. Detail and commitments on how these will be enforced must be included in the TIA. For example, section 9.4 discusses shuttle buses; however, it doesn't quantify the number of buses, when these would operate, or how many light vehicles this would reduce traffic volumes by.
	Key Issue 2 – The high-risk OSOM route assessment
4.	The proponent has confirmed that high-risk oversized overmass (OSOM) vehicles will be required for transport of the transformer. The following updates to the high-risk oversize overmass route study are required: a) The following locations are identified as traversing state road infrastructure however strategic concept designs have not been provided. Figures of location provided in Appendix B. • Corner of Botany Road / Bumborah Point Road • Median on Bunnerong Road • Hume Highway / Wollogorang Road crossover - The project vehicle appears to be tracking off the road surface at the middle crossover between directions at Hume Highway / Wollogorang Road. No hardstand has been proposed for this location b) Regarding the following proposed upgrades on the state road network: • Hume Highway crossover at Parkesbourne - The proponent is to confirm if this is to be removed post completion of the project to reinstate the existing arrangement of the highway crossover. The proponent has identified hardstand to be confirmed for detailed design to the standard of the Hume Highway. • Hardstand at Botany Road / Bunnerong Road – proponent notes this will remain in place for the life of the project however this hardstand is located at a highly trafficked intersection on the road network. The proponent is to be clear whether the modifications will be put back to their original condition after the movement has occurred. c) Swept paths for pull-over bays/rest areas along high risk OSOM routes (including GPS coordinates) to demonstrate that high risk OSOMs can be physically accommodated for the project (in terms of size, width and accessibility) need to be provided.

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	Note - The proponent has proposed contraflow on the Hume Highway. Detail regarding this will need be included in the TMP and TGS will be required. The proponent is to reach out to road.manager@transport.nsw.gov.au to discuss the potential contraflow and impacts on the Hume Highway.

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Attachment B

SSD - 78100252, Willavale Battery Energy Storage System - Various Lots, Goulburn Mulwaree Council; Response to Environmental Impact Statement

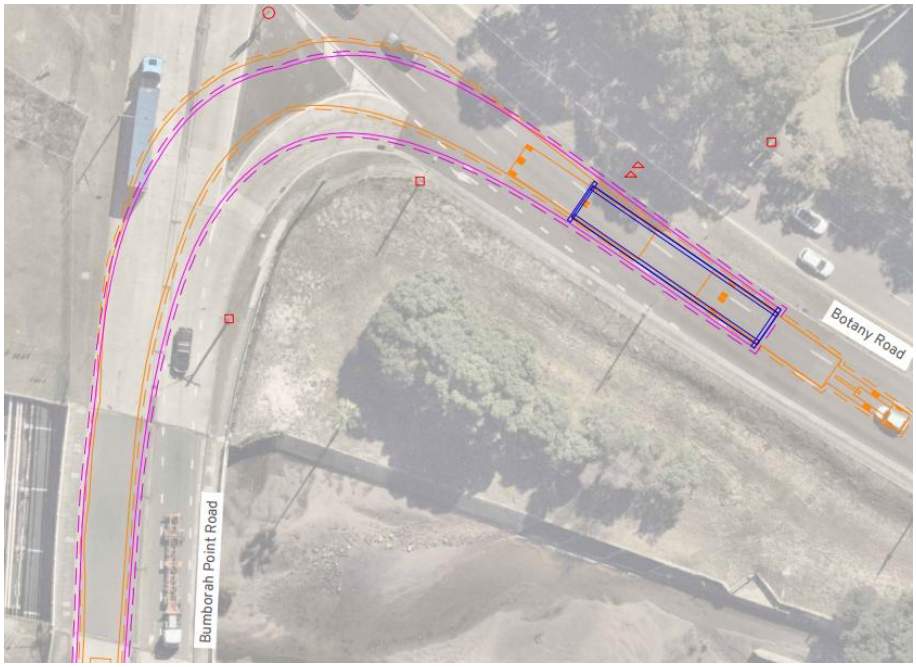

Figure - Corner of Botany Road / Bumborah Point Road

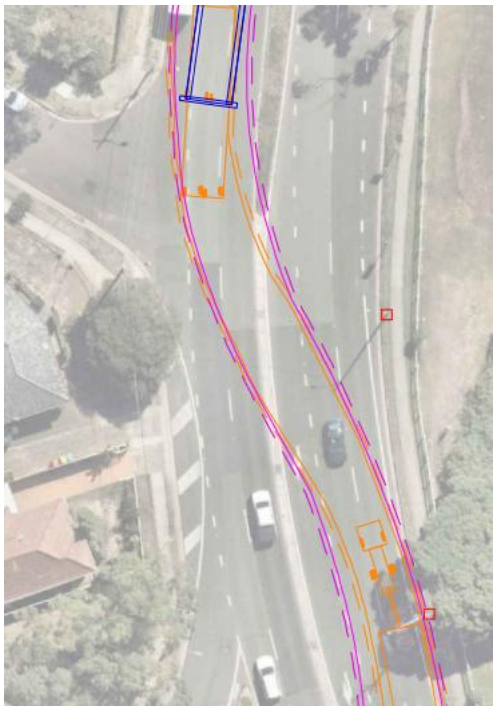

Figure – Median on Bunnerong Road

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Figure - Proposed Contraflow and Crossover widening – Hume Highway

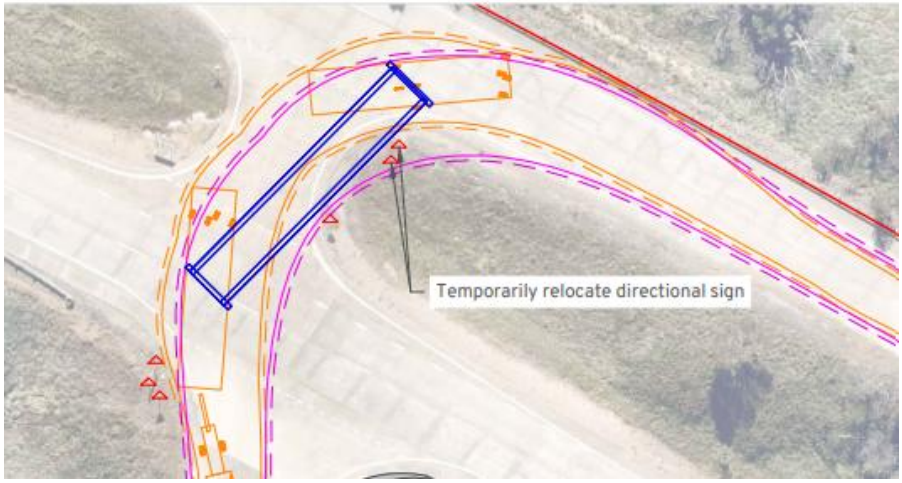

Figure – Hume Highway / Wollogorang Road crossover

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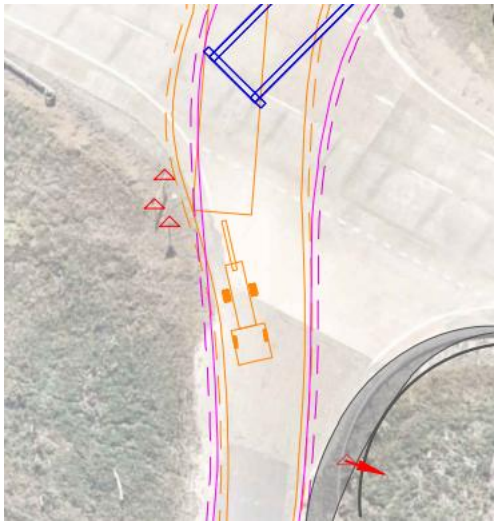

Figure – Intersection Hume / Wollorgorang Rd

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