

Subject: **Objection against the Mangoplah Battery Energy Storage System – SSD-77527735.**

Because the **Over Sized Over Mass (OSOM) heavy trucks should not be allowed to travel on the Holbrook Road, to the proposed Mangoplah BESS project site.**

I am writing to formally express my objection against the Mangoplah Battery Energy Storage System (BESS) project proposed by Samsung C & T Renewable Energy Australia (SREA) Pty. Ltd., to be located within the property on 4178 Holbrook Road, Mangoplah. Because the **Over Sized Over Mass (OSOM) heavy trucks should not be allowed to travel on the Holbrook Road, to the proposed Mangoplah BESS project site.**

The site is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land – to me it is not a place to build such a project.

The Holbrook Road is classified as a Regional Road, with a narrow bridge on the northern side of the village and two other narrow bridges close to Holbrook. Over Sized Over Mass (OSOM) vehicles are classified in NSW as Class 1 Load Carrying Vehicles and are eligible to operate up to 3.5m wide, 4.6m high, 25.0m long, 5.5m rear overhang and total mass of 49.5 tonnes on approved State and council routes in New South Wales.

As stated in the Traffic Impact Assessment by Amber “OSOM vehicles will be required to deliver larger plant to the site such as the sub-station transformer and earthmoving equipment. These vehicles are expected to exceed the Class 1 mass and/or dimension requirements and would be classified as high risk OSOM vehicles. These vehicles are subject to Transport Management Plans (TMPs) which provide a comprehensive planning and execution focus to ensure that vehicle movements are carried out in a safe and responsible manner with reduced impact on other road users and road infrastructure. High Risk OSOM vehicles also typically require pilot vehicle escort” (p.35, 2025). Amber, go on to further state that “These OSOM vehicles will travel outside of the peak periods and would be subject to the road upgrades and mitigation measures discussed throughout this section which would be confirmed as part of specific permits that would be applied for prior to construction” (p.35, Traffic Impact Assessment, 2025).

Amber, states that “A desktop assessment of bridge and rail infrastructure has been undertaken to determine interfacing locations with the proposed OSOM route” (p.39, Traffic Impact Assessment, 2025). A desktop analysis of the proposed bridges that need to be crosses with this very large and very heavy transformer, let alone the truck on which this transformer will be carried is somewhat different to a physical site inspection. They go onto state that “A detailed review of the load limits on all bridges and structures along the route will be undertaken as part of the permit process for the OSOM vehicles...” (p.39, Traffic Impact Statement). Further stating that “The State Roads along the route have been utilised for other renewable energy projects in the area and no restricted structures have been identified based on the NHVR Oversize Overmass Load Carrying Vehicles Network maps. Accordingly, it is expected that the vehicle loading will be within the allowable limit for all bridges, culverts and other structures on the State Road network” (p.39, Traffic Impact Assessment, 2025). There has been no mention in detail of travelling along the Holbrook Road to the proposed Mangoplah BESS site, which is a narrow regional road, with very narrow bridges, and no areas for two-way traffic to pull off and allow such an extremely long and wide High Risk OSOM vehicle to pass safely. Moreover, the two bridges located along the Holbrook Road, namely the Billabong Creek Bridge, was constructed in 1937, and only has a width of 6 metres, the other bridge, namely the

Black Creek Bridge, was constructed in 1935, and has a width of 7.2 metres, both obviously not built to carry the combined weight of the truck, trailer and transformer for the proposed Mangoplah BESS project.

The largest component to be delivered to the site is expected to be the 120MVA transformer, with estimated specifications, length 7.5m, width 2.75m, height 4.0m, weight 136 tonnes, to be carried on a 12x8 platform trailer, which will be approximately 33 metres long, and a width of 4.2 metres and the overall height from road to top of transformer over 5 metres (p.36, Amber, Traffic Impact Assessment, 2025). These measurement will only leave oncoming traffic a width of approximately 1.8 metres of roadway, as most of the Holbrook Road is only 6 metres wide, this can be very dangerous for the oncoming traffic, as there is very little safe areas for vehicles to go off the road to allow these OSOM vehicles to pass, this situation becomes even worse to ascertain, with farm machinery often needing to use the Holbrook Road, to carry out daily farm work, but more alarming would be the fact that in the event of an emergency such as fire and the Rural Fire Service vehicles rushing to a fire or accident along or near the Holbrook Road, these OSOM vehicles virtually blocking the road would cause no end of problems.

These OSOM vehicles will be required to transport massive transformers with a combined weight of more than 150 tonnes from Melbourne via the Hume Highway to Holbrook and then travel along the Reginal Road, the Holbrook Road. From the Hume Highway turnoff onto Holbrook Road travelling north to the proposed BESS site there are no rest areas, no overtaking lanes for normal traffic flow, or areas where normal traffic are able to pass, there are also hazardous corners, a lot of overhanging tree branches and a narrow bridge, it would be questionable if these OSOM vehicles would be allowed to travel along the Holbrook Road to the proposed Mangoplah BESS site. As a truck driver myself, I constantly use this section of roadway to take stock from the Mangoplah area to cattle sales in Victoria, so I am very familiar with the Holbrook Road, especially the two narrow bridges, the Billabong Creek Bridge and Black Creek Bridge, which are difficult enough to drive over safely in a cattle truck at maximum weight allowance, let alone allowing such a wide and extremely heavy load of the OSOM vehicle carrying the transformer for the Mangoplah BESS project. These two bridges are seen in the photos at the end of this letter, which clearly shows how narrow and how old these bridges are.

Furthermore, according to the National Heavy Vehicle Regulator (NHVR) National Network Map, located on Transport for NSW website, these OSOM vehicles are not permitted to travel on the Holbrook Road.

The NSW Government in their Guide to Transport Impact Assessment, 2024, they state that “Local councils and Transport for NSW (TfNSW) are responsible for the safe and efficient management of transport networks” (p. 1-2). They go onto say that “Land use developments generate trips that may impact the surrounding transport network, its users, and the surrounding community” (p. 1-2). With the additional heavy volume of traffic from workers required during construction of the new access roadway to the proposed Mangoplah BESS project, I fell will add to the increased risks and safety concerns for not only the residents within Mangoplah but also for the normal traffic that travels along Holbrook Road and through Mangoplah on a daily basis, there have been numerous traffic incidents along the Holbrook Road over the years from minor to serious, resulting in deaths.

Furthermore, there has been no consideration for “A thorough understanding of the existing...condition allows for the robust transport impact assessment of a proposed development” (p. 3-8), NSW Government, Guide to Transport Impact Assessment, 2024).

Moreover, there is currently no turning treatments at the proposed Mangoplah BESS project site access for these heavy vehicles and a speed limit of 100km/hr applies along the Holbrook Road, the NSW Government state that “Early consideration of site access facilities and layout design is critical to driving positive outcomes for a development’s occupants and affected road users” (p. 7-2, Guide to Transport Impact Assessment, 2024), further stating that “the proposed measures should focus on maximising sustainable and safe accessibility to the development” (p.3-12).

There has been a distinct lack of consultation with the Mangoplah community regarding the OSOM vehicle movements that will be required to navigate along the Holbrook Road, to the proposed Mangoplah BESS project site. Not to mention the Holbrook Road is already in poor condition requiring constant repair, it is mind boggling how much damage these OSOM vehicles will do to the Holbrook Road. I feel these OSOM vehicles travelling on such a road would only add to the increase risks and safety concerns of those travelling along the Holbrook Road on a daily basis, as according to Google maps the best way to travel from Wagga Wagga to Albury is along the Holbrook Road, stating it is approximately 129km and will take 1hour 32minutes. Moreover, according to a Trans Traffic Survey of the Holbrook Road, reported that over 1,000 vehicles travelled along the road, on a daily basis, with these vehicles notoriously travelling with speeds between 100 km and 109 km per hour along the section of road in the vicinity of the proposed Mangoplah BESS project site (cited in Traffic Impact Assessment, Amber, Traffic & Transportation Direction, 2025). Moreover, there have been numerous traffic incidents along the Holbrook Road over the years from minor to serious, resulting in deaths.

As I have had a long association with the Mangoplah area, with my in-laws, living and farming in the vicinity of the proposed Mangoplah BESS project, it deeply concerns and affects me that a rural community like Mangoplah is being put at risk of such a dangerous project being proposed on RU1 agricultural land. This change in the land use from farming to industrial I feel will negatively impact Mangoplah’s rural setting and lifestyle. I take it upon you to consider the cost to the Mangoplah community and how this project will affect them in the future, as many of the local community members have been in the district for generations and do not want the proposed Mangoplah BESS project to go ahead.



Billabong Creek Bridge – built in 1937



Back Creek Bridge – built in 1935