



Traffic & Transportation Direction



## **Bellambi Heights Battery Energy Storage System**

696 Castlereagh Highway, Beryl

Stage 2 Traffic Management Plan

January 2026

Reference: 1019 tmp s2 reve 260106

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696 Castlereagh Highway, Beryl

## Stage 2 Traffic Management Plan

Prepared for: Vena Energy Services Australia Pty Ltd

Status: Final report

Date: 6 January 2026

Reference: 1019 tmp S2 RevE 260106

Revision	Date	Description	Author	Reviewed	Approved
A	18/09/25	Draft for external stakeholders	T. Dwyer	T. Dwyer	-
B	30/10/25	Updated draft following authority feedback	T. Dwyer	T. Dwyer	O. Mihaila
C	12/11/25	Update following TfNSW feedback	T. Dwyer	T. Dwyer	O. Mihaila
D	12/12/25	Minor updates to incorporate interim restricted construction activities	T. Dwyer	T. Dwyer	O. Mihaila
E	06/01/26	Minor updates	T. Dwyer	T. Dwyer	O. Mihaila

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# ADDENDUM

## TRAFFIC GENERATION

### Section 3.4 is amended as follows:

Traffic volumes are to be managed so that the development does not generate more than:

- 60 heavy vehicle movements a day, and
- 36 light vehicle movements and 4 heavy vehicle movement between the hours of:
  - o 6 am to 7 am
  - o 7 am to 8 am
  - o 8 am to 9 am, and
  - o 5 pm to 6 pm.

## COMPLIANCE REPORTING

### Section 9.5 is added as follows:

Monthly compliance reporting will be provided to TfNSW, MWRC and DPHL

## Table of Contents

1.	Introduction .....	1
1.1	Project Background .....	1
1.2	Objectives.....	3
1.3	TMP Staging .....	3
1.4	Statutory Requirements.....	4
1.5	Road Authority Consultation .....	12
2.	Existing Conditions.....	20
2.1	Site Location.....	20
2.2	Road Network .....	22
2.3	Traffic Volumes .....	22
2.4	Restricted Vehicle Access.....	22
2.5	Public Transport Services .....	24
3.	Construction Overview .....	26
3.1	Project Description.....	26
3.2	Stage 2 Works .....	26
3.3	Construction Schedule.....	26
3.4	Traffic Generation.....	27
3.5	Vehicle Access Routes .....	28
4.	Traffic Management Responsibilities .....	30
5.	Traffic Management Strategy .....	33
5.1	Driver Protocols .....	33
5.2	Delivery Logistics.....	33
5.3	Information and Communications .....	34
5.4	School Buses and Public Transport .....	34
5.5	On-Site Mitigation Measures.....	35
5.6	Car-Pooling & Shuttle Buses.....	35
5.7	Environment Management .....	40
5.8	Emergency Repair or Maintenance Requirements .....	40
5.9	Adverse Weather Conditions.....	41
5.10	Emergency Access and Management .....	41
6.	Temporary Traffic Management.....	42
6.1	Hazard Identification, Risk Assessment and Control .....	42
6.2	Traffic Guidance Schemes .....	42
6.3	Traffic Control Devices .....	43
7.	Communicating TMP Requirements .....	44
7.1	Induction.....	44
7.2	Pre-Start and Toolbox Meetings.....	44

8.	Monitoring and Measurement .....	45
8.1	Site Inspections and Record Keeping .....	45
8.2	Obligation to Minimise Harm.....	45
8.3	Incidents and Non-Compliances .....	45
8.4	Complaints Management.....	47
8.5	Management and Monitoring Summary .....	47
9.	Management and Reporting .....	49
9.1	TMP Review and Improvement.....	49
9.2	Update of Strategies, Plans or Programs.....	49
9.3	Notification of Department.....	49
9.4	Independent Environmental Audits .....	49

## Appendices

### Appendix A

Driver Code of Conduct .....	1
Safe Driving Principles .....	1
Primary Driver Code.....	1
Chain of Responsibility .....	4
Emergency Procedures .....	4
Driver Fatigue.....	4
Maintenance Requirements.....	5
Complaint Resolution.....	5
Disciplinary Procedure .....	6

### Appendix B

*NHVR Heavy Vehicle Driver Fatigue Requirements*

### Appendix C

*Road Authority Consultation*

### Appendix D

*Extract of Approved Road Upgrade*

### Appendix E

*Approved Project Layout (Mod-1)*

### Appendix F

*Vena Letter Restricted Construction Activities*

### Appendix G

*Road Authority Consultation – Restricted Stage 2 Construction Activities*

# 1. Introduction

## 1.1 Project Background

The Bellambi Heights Battery Energy Storage System (BESS) (the Project) is a 408MW BESS located at 696 Castlereagh Highway, Beryl.

The Development Consent (DC) – Application Number: SSD-33344237- requires the preparation of a Traffic Management Plan (TMP).

Amber Organisation Pty Ltd has been engaged by Vena Energy to prepare a TMP to detail the proposed traffic management measures to be implemented during the construction works and respond to this requirement.

Figure 1 shows the proposed layout of the site in relation to the road network. The new site access is currently under construction (TfNSW WAD WST24/0004 ROL 2537526) and scheduled for completion 20 November 2025. An extract of the approved construction drawings is included in Appendix D. Construction of the development is scheduled to commence 1 December 2025.

This Stage 2 TMP applies to construction and commissioning of the development, excludes movements of heavy vehicles requiring escort/pilot.

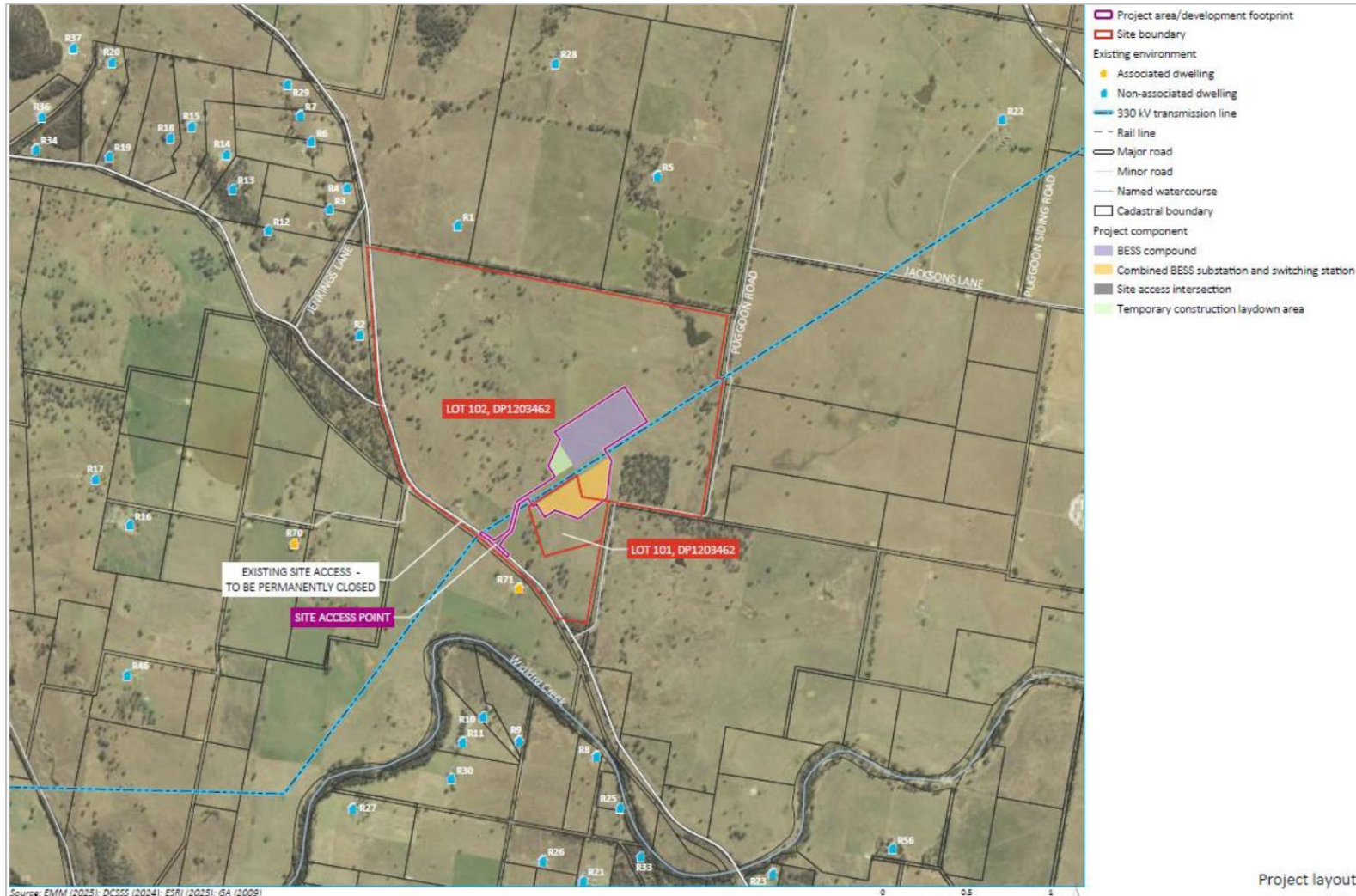
The approved Stage 1 TMP applied to the road upgrade currently under construction. Future staging of TMPs is outlined in Section 1.3.

The project was subject to a modification that involved minor changes to the development footprint (SSD-33344237-Mod-1). The modification was formally approved by DPHI on 20 October 2025. This modification does not have any impact on the traffic and transport aspects of the project and this TMP, and the revised footprint is included for reference in Appendix E.

The primary traffic impacts relate to the traffic generation associated with the transport of materials and the workforce to and from the site, with these effects able to be managed with minimal impact to the road network.

This TMP has been prepared with input from Vena and both Principal Contractors and based on the available construction information at the time of writing.

Figure 1: Project Layout (inclusive of Mod-1)



Source: Consolidated Consent



## 1.2 Objectives

The key objective of this TMP is to ensure safe and efficient movement of vehicles to/from the site, whilst minimising disruptions and impacts, and maintaining a safe environment for vehicular traffic external to the site. More specifically, the objectives of the TMP are to:

- Provide a safe environment for the travelling public and construction personnel
- Cater for the needs of all traffic
- Communicate the purpose of the proposed traffic management measures, and
- Communicate the arrangements for and impacts of any management measures affecting traffic

To assist in meeting these objectives the TMP provides information on:

- The Scope of Works
- Site conditions
- Permissible working times. and
- Procedures and responsibilities

Vena Energy, as the Applicant, shall ensure that the requirements of the document and other relevant information will be monitored and the TMP adjusted to meet changing requirements where necessary.

## 1.3 TMP Staging

The TMP is to be staged as follows:

- Stage 1: Road upgrade - approved 29 April 2025.
- Stage 2: Construction of the development to commence 12 January 2026.
- Stage 3: Delivery of project components by heavy vehicles requiring escort/pilot, to occur August to October 2026.
- Stage 4: Operation of the BESS from June 2027.
- Stage 5: Decommissioning the BESS at end of life.

This TMP applies to Stage 2, with separate TMPs to be prepared for Stage 3 onwards.

### 1.3.1 Interim Restricted Construction Activities

Management of poor subgrade conditions from November 2025 has delayed the completion of the road upgrade works at the site access. Completion is now scheduled 12 January 2026.

To mitigate schedule impacts and maintain the project's planned completion, restricted construction activities are to commence on-site from 12 January 2026. These activities will be restricted to:

- site mobilisation,
- fencing,

- temporary laydown establishment,
- sediment and erosion controls,
- site sheds and amenities, and
- commencement of bulk earthworks.

The limitations on the restricted construction activities are specified in Vena’s letter to DPHI and TfNSW included for reference in Appendix F.

Access for construction vehicles is via the main site access under traffic control undertaken in coordination with the road contractor on-site and under applicable and approved Traffic Guidance Scheme (TGS) and Road Occupancy Licence (ROL) requirements.

Vehicles used during the restricted construction phase will be the same as the heavy vehicles that have been used during the road construction (i.e. standard semi-trailers, truck and dogs and smaller non-articulated trucks). The site access will provide sufficient space to safely accommodate these vehicles being designed for 26m B-Doubles.

Vehicle movements will remain under consented vehicle movement limits (as outlined in this TMP), with no heavy vehicles requiring escort to be used during restricted construction activities.

Feedback on the proposed arrangements was sought from the TfNSW Development Renewables team and Council as summarised in Section 1.5.2 and Appendix G.

## 1.4 Statutory Requirements

This document fulfills the requirements of Environmental Condition B9 of the Development Consent (Application Number: SSD-33344237) which requires the provision of a Traffic Management Plan and has been prepared with consideration to the other transport conditions outlined within the Development Consent. The matters relevant to transport outlined within Part A, Part B and Part C of the Development Consent have been summarised within Table 1, Table 2 and Table 3 respectively.

**Table 1: Development Consent Requirements – Part A**

CONDITION		REFERENCE LOCATION
<b>Obligation To Minimise Harm To The Environment</b>		
A1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction, commissioning, operation, upgrading, rehabilitation or decommissioning of the development.	<b>Complies:</b> Refer Section 8.2
<b>Evidence of Consultation</b>		
A13	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> <li>(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and</li> <li>(b) provide details of the consultation undertaken including:                             <ul style="list-style-type: none"> <li>(i) the outcome of that consultation, matters resolved and unresolved; and</li> <li>(ii) details of any disagreement remaining between the party</li> </ul> </li> </ul>	<b>Complies:</b> A draft Stage 2 TMP (Rev A) was provided to relevant road authorities in September 2025. Records of the feedback are included in Section 1.5 and Appendix C. This revision (Rev. C) of the



	consulted and the Applicant and how the Applicant has addressed the matters not resolved.	TMP has been updated in view of the feedback received.
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**Table 2: Development Consent Requirements – Part B**

	CONDITION	REFERENCE LOCATION
<b>Heavy Vehicles Requiring Escort and Heavy Vehicle Restrictions</b>		
B1	The Applicant must ensure that the: <ul style="list-style-type: none"> <li>a) development does not generate more than:                             <ul style="list-style-type: none"> <li>i) 40 heavy vehicle movements a day during construction, upgrading and decommissioning;</li> <li>ii) 20 light vehicle movements and 4 heavy vehicle movements during the AM (6-7 am) or PM (5-6 pm) project peak hours during construction, upgrading or decommissioning; and</li> <li>iii) 4 movements of heavy vehicles requiring escort during construction, upgrading or decommissioning; and</li> </ul> </li> <li>b) length of any vehicles (excluding heavy vehicle requiring escort) used for the development does not exceed 26 metres, unless the Planning Secretary agrees otherwise.</li> </ul>	<p><b>Complies:</b></p> <p>Refer Section 3.4</p> <p>As this TMP only applies to the Stage 2 of the project (refer Section 1.3); further detail of the traffic movements for upgrading or decommissioning will be managed by way of future TMPs if and when required.</p> <p><i>Note: No heavy vehicles requiring escort/pilot will be required for Stage 2.</i></p>
B2	The Applicant must keep accurate records of the number of heavy vehicles requiring escort and heavy vehicles entering or leaving the site each day for the duration of the project.	<p><b>Complies:</b></p> <p>Section 5.2</p>
<b>Access Route</b>		
B3	All heavy vehicles associated with the development must travel to and from the site via: <ul style="list-style-type: none"> <li>a) Golden Highway and Castlereagh Highway north of the development; or</li> <li>b) Castlereagh Highway south of the development,</li> </ul> as described in the EIS.	<p><b>Complies:</b></p> <p>Section 3.5.</p>
B4	All heavy vehicles requiring escort associated with the development must travel to and from the site via the Golden Highway and Castlereagh Highway north of the development as identified in Figure 2 of Appendix 3.	<p><i>Note: No heavy vehicles requiring escort/pilot will be required for Stage 2.</i></p>
<b>Site Access</b>		
B5	All vehicles associated with the development must enter and exit the site via the site access point off Castlereagh Highway as identified in Appendix 1.	<p><b>Complies:</b></p> <p>The road upgrades are to be completed as part of the approved Stage 1 TMP which are due for completion in January 2026.</p> <p>All vehicles will access the site for Stage 2 works via the main access, refer Section 3.5.</p> <p>The existing site access is to be removed as part of the Stage 1 works.</p> <p>A photo of the closed</p>
B6	Unless the Planning Secretary agrees otherwise, the existing site access off the Castlereagh Highway must be closed before any development related vehicles enter the site.	



	CONDITION	REFERENCE LOCATION
		access will be provided to TfNSW once the Notice of Practical Completion is issued by TfNSW.
<b>Road Upgrades</b>		
B7	<p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must complete the road upgrades detailed in Appendix 3.</p> <p>Unless the relevant road authority agrees otherwise, these upgrades must comply with the current <i>Austroads Guidelines, Australian Standards</i> (as amended by <i>TfNSW supplements</i>), and be carried out to the satisfaction of the relevant roads authority.</p>	<p><b>Complies:</b></p> <p>The road upgrades are to be completed as part of the approved Stage 1 TMP which are due for completion January 2026.</p> <p>An extract of the approved road upgrade construction plans are shown Appendix D.</p> <p>To manage project schedule impacts, restricted construction activities are proposed to start prior to completion of the BAL/BAR. Construction vehicles would access the site at the main access under suitable traffic control until final completion, refer Section 1.5.1.</p>
<b>Operating Conditions</b>		
B8	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> <li>a) any new internal roads are constructed and maintained as all-weather roads;</li> <li>b) any existing internal roads are maintained as all-weather roads;</li> <li>c) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;</li> <li>d) the capacity of the existing roadside drainage network is not reduced;</li> <li>e) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and</li> <li>f) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the public road network.</li> </ul>	<p><b>Complies:</b></p> <ul style="list-style-type: none"> <li>a) Section 5.5</li> <li>b) Section 5.5</li> <li>c) Section 5.5</li> <li>d) Section 5.7</li> <li>e) Section 5.5</li> <li>f) Section 5.7</li> </ul>
<b>Traffic Management Plan</b>		
B9	<p>Prior to commencing road upgrades identified in condition B7, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include:</p> <ul style="list-style-type: none"> <li>a) details of the transport route to be used for all development-related traffic;</li> </ul>	<p><b>Complies where applicable:</b></p> <p>Section 3.5.</p>

	CONDITION	REFERENCE LOCATION
	b) details of the road upgrade works required by condition B7;	<p>The road upgrades are to be completed as part of the approved Stage 1 TMP which are due for completion 12 January 2026.</p> <p>An extract of the approved road upgrade construction plans is shown Appendix D.</p>
	c) details of the closure of the existing site access as required by condition B6;	<p>The existing site access is to be removed as part of the Stage 1 works, refer Appendix D.</p>
	d) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:	-
	i) temporary traffic controls, including detours and signage;	<p>Traffic control measures to safely manage access for restricted construction activities are outlined in Section 3.5.1, 6.2.1 and Appendix F.</p> <p>Temporary Traffic Controls are otherwise not expected to be required during main Stage 2 works once the road upgrade are fully complete.</p> <p>Should they be required, they are to be implemented in accordance with the framework outlined in Section 6.</p>
	ii) notifying the local community about development-related traffic impacts;	Section 5.3
	iii) procedures for receiving and addressing complaints from the community about development related traffic;	Section 8.4
	iv) minimising potential cumulative traffic impacts with other State significant development projects in the area (including consultation with the Applicant of Tallawang Solar Farm regarding scheduling of peak construction movements and further traffic management measures (if required) to ensure the road upgrades identified in condition B7 are compliant with Austroads Guidelines);	<p>Section 5.2. Monthly updates are to be sought from the Tallawang Solar Farm (and other state significant development projects) and haulage movements scheduled accordingly. It is noted that the most recent advice from Tallawang Solar Farm is that the construction is scheduled late Q4 2026,</p>

	CONDITION	REFERENCE LOCATION
		Vena Energy will notify TfNSW and Council on any advice received from Tallawang Solar Farm during the process of construction.
	v) minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network;	Section 5.2
	vi) minimising dirt tracked onto the public road network from development-related traffic;	Section 5.7
	vii) details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service as described in the EIS;	Section 5.6
	viii) encouraging car-pooling or ride sharing by employees;	Section 5.6
	ix) scheduling of heavy vehicle movements to minimise convoy length or platoons, and to minimise conflict with light vehicles;	Section 5.2
	x) responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;	Section 5.9
	xi) responding to any emergency repair or maintenance requirements; and	Section 5.8
	xii) a traffic management system for managing heavy vehicles requiring escort;	<b>Not Applicable:</b> No heavy vehicles requiring escort/pilot will be required for Stage 2.
	e) a driver's code of conduct that addresses:	
	i. driver fatigue;	Appendix A Appendix B
	ii. procedures to ensure that drivers adhere to the designated transport routes and speed limits; and	Appendix A
	iii. procedures to ensure that drivers implement safe driving practices; and	Appendix A
	f) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan.	Section 5.1, Appendix A

Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.

**Table 3: Development Consent Requirements – Part C**

	CONDITION	REFERENCE LOCATION
<b>Revision of Strategies, Plans and Programs</b>		
C2	The Applicant must: a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to	<b>Complies:</b> Refer Section 9.2



CONDITION		REFERENCE LOCATION
	carrying out any upgrading or decommissioning activities on site; and	
	b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: <ul style="list-style-type: none"> <li>▪ submission of an incident report under condition C10 of Schedule 2;</li> <li>▪ submission of an audit report under condition C14 of Schedule 2; or</li> <li>▪ any modification to the conditions of this consent.</li> </ul>	<b>Complies:</b> Refer Section 9.2
Updating and Staging of Strategies, Plans or Programs		
C3	With the approval of the Planning Secretary, the Applicant may stage the development and may: <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p>	<b>Complies:</b> Refer Section 9.2
C4	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	<b>Complies:</b> Refer Section 9.2
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	<b>Complies:</b> Refer Section 9.2
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	<b>Complies:</b> Refer Section 9.2
Notification of Department		
C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<b>Complies:</b> Refer Section 9.3
Incident Notification		
C10	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident.	<b>Complies:</b>



CONDITION		REFERENCE LOCATION
	The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.	Refer Section 8.3
<b>Non-Compliance Notification</b>		
C11	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	<b>Complies:</b> Refer Section 8.3
C12	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	<b>Complies:</b> Refer Section 8.3
C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	<b>Complies:</b> Refer Section 8.3
<b>Independent Environmental Audit</b>		
C14	Independent Audits of the development must be conducted and carried out at the frequency and in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	<b>Complies:</b> Refer Section 9.4
C15	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<b>Complies:</b> Refer Section 9.4
C16	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition C14 of Schedule 2 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	<b>Complies:</b> Refer Section 9.4
C17	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition 6 of Schedule 4 of this consent, or condition 6B of Schedule 4 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	<b>Complies:</b> Refer Section 9.4
C18.	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	<b>Complies:</b> Refer Section 9.4

CONDITION		REFERENCE LOCATION
C19	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	<b>Complies:</b> Refer Section 9.4
<b>Access to information</b>		
C20	The Applicant must: <ul style="list-style-type: none"> <li>a) make the following information publicly available on its website as relevant to the stage of the development:                             <ul style="list-style-type: none"> <li>▪ the EIS;</li> <li>▪ the final layout plans for the development;</li> <li>▪ current statutory approvals for the development;</li> <li>▪ approved strategies, plans or programs required under the conditions of this consent;</li> <li>▪ the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</li> <li>▪ how complaints about the development can be made;</li> <li>▪ any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</li> <li>▪ any other matter required by the Planning Secretary; and</li> </ul> </li> <li>b) keep this information up to date.</li> </ul>	<b>Complies:</b> Refer Section 5.3
		<b>Complies:</b> Refer Section 5.3

### 1.4.1 Relevant Definitions

Key traffic and transportation terms used in this document are provided below, consistent with the Development Consent (where appropriate):

**Heavy vehicle:** As defined by the *Heavy Vehicle National Regulator* under the *Heavy Vehicle National Law (NSW)*

**Heavy vehicle requiring escort:** Any vehicle that requires a pilot vehicle and/or escort vehicle, as defined by the National Heavy Vehicle Regulator's NSW Class 1 Load Carrying Vehicle Operator's Guide

**Light vehicle:** As defined by the Transport for NSW Vehicle standards information sheet VSI 05 Light vehicle dimension limits Rev 6 (TfNSW, 11 March 2015)

**Vehicle movement:** One vehicle entering and leaving the site.

**Vehicle trip:** A one-way vehicular trip from one point to another excluding the return journey. Therefore, a return trip to and from the site is counted as two trips.

When used in this TMP, the words are consistent with the definition outlined.

## 1.4.2 Related Documents

A Traffic Impact Assessment<sup>1</sup> (TIA) was previously prepared by EMM Consulting Pty Ltd as part of the EIS submission, along with three further elements that relate to traffic and transport matters comprising:

- *Response to TfNSW – RTS* (EMM Consulting Pty Ltd)
- *Response to Submissions* (EMM Consulting Pty Ltd)
- *Additional Information 23 February 2023* (EMM Consulting Pty Ltd)

The TIA and supplementary information are available in the public domain from the NSW Major Projects website<sup>2</sup>.

Where relevant, reference is made to these reports in this TMP.

## 1.5 Road Authority Consultation

The Stage 2 TMP Rev. A was shared with representatives from TfNSW and Mid-Western Regional Council for comment and review in September 2025.

Mid-Western Regional Council provided comments to the draft TMP 3 October 2025. Matters relevant to be addressed in a revised TMP are summarised in Table 4, along with a response and reference location. The response to Council’s comments was discussed at a meeting with Council on 29 October 2025. No outstanding issues were raised.

**Table 4: Council Comments and Response**

Matter	Council Comment	Response	Reference Location
Shuttle Bus Arrangements	<p><i>Shuttle bus details are to be finalised prior to commencement of Stage 2 works, including:</i></p> <ul style="list-style-type: none"> <li>• <i>confirmed routes,</i></li> <li>• <i>designated pick-up/drop-off locations,</i></li> <li>• <i>parking facilities for workers’ vehicles, and</i></li> <li>• <i>timetables coordinated with construction shifts.</i></li> </ul> <p><i>This information is to be provided to Council and TfNSW before construction begins.</i></p>	The TMP has been amended with details on the shuttle bus arrangements including routes, pick-up/drop-off locations, parking arrangements and timetables.	<b>Section 5.6.2</b>
Signage and Traffic Guidance Schemes	<p><i>Where temporary external traffic control is required, site-specific Traffic Guidance Schemes (TGS) will be prepared by a TfNSW-accredited designer.</i></p> <ul style="list-style-type: none"> <li>• <i>Diagrams showing sign placement, spacing, and sequencing will be appended to the TMP.</i></li> <li>• <i>All devices will comply with AS 1742.3:2019 and TfNSW Traffic Control at Work Sites guidelines.</i></li> </ul>	The TMP has been updated in-line with this feedback.	<b>Section 6.2</b>

<sup>1</sup> Addendum Traffic Impact Assessment, EMM Consulting Pty Ltd, dated 30 November 2023.  
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-33344237%2120230807T121633.166%20GMT>

<sup>2</sup> <https://www.planningportal.nsw.gov.au/major-projects/projects/bellambi-heights-battery-energy-storage-system>



Matter	Council Comment	Response	Reference Location
School Bus Coordination	<p><i>Formal protocols with Ogden Coaches will be documented prior to works, including:</i></p> <ul style="list-style-type: none"> <li>• <i>confirmation of bus routes and times,</i></li> <li>• <i>provision of 48-hour advance notice for major deliveries, and</i></li> <li>• <i>traffic control at the site access during school bus operating windows if heavy vehicles are scheduled.</i></li> </ul>	Further consultation with Ogden Coaches along with additional safety measures related to school buses is included in this revision of the TMP.	<b>Section 5.4</b>
Emergency Access and Council Notification	<ul style="list-style-type: none"> <li>• <i>The TMP will include an Emergency Access Strategy covering detour arrangements in the event of Castlereagh Highway closure.</i></li> <li>• <i>Council will be notified of any road-related incidents or emergency traffic management measures</i></li> </ul>	Further detail on emergency access arrangements and Council notification has been included in this revision of the TMP.	<b>Section 5.10</b>
Cumulative Impacts	<p><i>Liaison with nearby State significant projects (including Tallawang Solar Farm and ACERZ) should be undertaken on a monthly basis during construction.</i></p> <ul style="list-style-type: none"> <li>• <i>Records of consultation will be kept and shared with Council and TfNSW upon request.</i></li> <li>• <i>Construction traffic scheduling will avoid coinciding peak periods where feasible.</i></li> </ul>	This revision of the TMP has been updated in-line with this feedback	<b>Section 5.2.1</b>
Council Assessment Matrix	<p><i>B1 – Heavy Vehicle Caps</i></p> <p><i>TMP sets limits and requires daily logs. Needs clear evidence of auditable system. Require confirmation of data recording system (e.g., GPS logs, weighbridge, gate log).</i></p>	A Gate Log will be used to document arrivals and departures to site, managed by the Traffic Access Controller	<b>Table 4, Section 5.2</b>
Council Assessment Matrix	<p><i>B3 – Heavy Vehicle Routes</i></p> <p><i>Routes clearly defined. No allowance for local roads. Acceptable – but Council to request commitment that no local roads will be used.</i></p>	The revision of the TMP includes a commitment that Council would be consulted on the use of any local roads by heavy vehicles	<b>Section 3.5.3</b>
Council Assessment Matrix	<p><i>B8 – Site Operations</i></p> <p><i>On-site parking and mud control addressed. No wheel wash detail. Require specification of vehicle wheel wash or equivalent before public road access.</i></p>	A rumble/shaker grid is to be positioned in the site access road near the main access	<b>Section 5.7</b>
Council Assessment Matrix	<p><i>Signage &amp; Wayfinding</i></p> <p><i>Only framework provided, no diagrams of signage/TGS. Require detailed Traffic Guidance Schemes prior to works.</i></p>	Temporary traffic management on the external road network is not expected for Stage 2. Relevant sections of this TMP have been updated based on Council's feedback on TGS plans.	<b>Section 6.2</b>

Matter	Council Comment	Response	Reference Location
Council Assessment Matrix	<i>School Bus Coordination</i> <i>Mentions Ogden Coaches, but no written protocols. Require confirmation of consultation records &amp; bus conflict management (traffic controller protocol).</i>	Further measures for consultation with Ogden Coaches and safety measures for school buses are included in this revision	<b>Section 5.4</b>
Council Assessment Matrix	<i>Cumulative Impacts (Tallawang Solar, ACEREZ).</i> <i>Acknowledged but relies on future liaison. Require monthly records of consultation and scheduling coordination.</i>	Monthly records of consultation will be kept and shared with Council and TfNSW upon request.	<b>Section 5.2.1</b>
Council Assessment Matrix	<i>Emergency Access / Detour</i> <i>Covers incident reporting to DPIE, but no detour plan or Council notification. Require TMP addendum to include emergency detour strategy and Council notification pathway.</i>	Further detail on emergency access arrangements and Council notification has been included in this revision of the TMP.	<b>Section 5.10</b>
Council Assessment Matrix	<i>Monitoring &amp; Auditing</i> <i>Monthly audits by Vena/PCs, but unclear how results are shared.</i> <i>Require audits to be provided to Council/TfNSW</i>	Audits of the TMP to be provided to Council or TfNSW upon request.	<b>Section 8.1 and 9.4</b>
Council Assessment Matrix	<i>Community Events</i> <i>Notes Gulgong Show, Folk Festival, etc.</i> <i>Acceptable, but Council requires event calendar check-ins as part of delivery scheduling.</i>	Monthly check-ins of the Mid-Western Regional Council Events Directory webpage are included in this revision of the TMP.	<b>Section 5.2</b>

TfNSW representatives provided comments to the draft TMP in a letter dated 11 November 2025 (TfNSW reference: REN25/00177/001). Matters relevant to be addressed in a revised TMP are summarised in Table 4, along with a response and reference location.

**Table 5: TfNSW Comments and Response**

No.	TfNSW Comment	Response	Reference Location
1.	<i>The TMP should include details of the enforcement and monitoring measures that will be implemented to record and track the 40 daily heavy vehicle volumes</i>	A Gate Log will be used to document and monitor arrivals and departures to site, managed by the Traffic Access Controller. Any non-compliance with the TMP and Driver Code of Conduct will be investigated and disciplinary action taken.	<b>Table 4, Section 5.2, Appendix A – Disciplinary Procedure</b>
2.	<i>The TMP should include details of the enforcement and monitoring measures that will be implemented to record and track the 20 light vehicle volumes and 4 heavy vehicle movements during the AM (6-7 am) or PM (5-6 pm) project peak hours during construction, upgrading, or decommissioning</i>	Per response to comment No. 1.	-
3.	<i>The TMP should include commitments made within EIS and RTS stages of the assessment which include the following</i> <i>a. Detail the impacts with the proposed increase from 100 to 134 workforce personal</i> <i>b. Original commitment was for 20 Light vehicles and up to 80 workers at peak construction were to be transported to the site in a typical 12.5m bus which carries approximately 50 seated passengers.</i> <i>c. Detail enforcement and monitoring measures as mentioned in points 1 and 2</i>	a), b) Subsequent to the EIS process, further design development and engagement with construction contractors has resulted in the staffing requirements being refined. Whilst there has been an increase in workforce, the overall construction program has been reduced by 4 months. The impact of this has been to increase reliance and use of shuttle bus services to comply with consent conditions. c) Per response to comment No. 1.	<b>Section 3.4.1, Section 5.6.2.</b>
4.	<i>The TMP should include a reference “heavy vehicle lengths are not to exceed 26m” to support conditions of consent B1 (b).</i>	A statement consistent with this comment has been added to the TMP.	<b>Section 3.4</b>
5.	<i>The TMP should include a map reference that identifies the heavy vehicle routes to support condition B3.</i>	This figure forms part of the consolidated consent – Appendix 3, Figure 2 and has been added to show the principal haulage route for heavy vehicles.	<b>Section 3.5 Figure 8, Figure 9</b>
6.	<i>The TMP should include reference that states no onsite construction works are to commence prior to the completion of the intersection upgrade unless supported by a Planning Secretary request and subsequent updated TMP.</i>	A statement consistent with this comment has been added to the TMP.	<b>Section 3.2</b>



No.	TfNSW Comment	Response	Reference Location
7.	<p><i>The TMP should include reference that TGS/ROL Approval is required prior to works commencing and Traffic Guidance Schemes (TGS) to be prepared by a TfNSW-accredited designer and to comprise:</i></p> <p><i>a. A plan package showing sign placement, spacing, and sequencing will be appended to the TMP.</i></p> <p><i>b. All devices to comply with AS 1742.3:2019 and TfNSW Traffic Control at Work Sites guidelines.</i></p>	<p>TGS and ROL approval was obtained for the Stage 1 works which involve the construction of the site access.</p> <p>TGS/s and ROL/s are required for the Stage 2 TMP as all works will be on-site.</p> <p>Nonetheless, a procedure is outlined in the Stage 2 TMP in the event a TGS or ROL is required during Stage 2.</p>	<p><b>Section 6.2</b></p>
8.	<p><i>The TMP should TfNSW in reference that requires photo evidence for the completed works to close the existing access</i></p>	<p>A photo of the closed access will be provided to TfNSW once the Notice of Practical Completion is issued by TfNSW.</p>	<p><b>Table 2</b></p>
9.	<p><i>The Department of Planning, Housing and Infrastructure would be satisfied with the following:</i></p> <p><i>a. sufficient information has been provided within section 5.3-Information and Communications to address B9 d(ii)</i></p> <p><i>b. sufficient information has been provided to address condition B9 d(iii)</i></p>	<p>Noted</p>	<p>-</p>
10.	<p><i>The TMP should include supporting consultation with Tallawang Solar Farm in relation to condition B9 d(iii).</i></p>	<p>Monthly records of consultation will be kept and shared with Council and TfNSW upon request.</p>	<p><b>Section 5.2.1</b></p>
11.	<p><i>Insufficient information has been provided to adequately address condition B9 d(v) which is to minimise potential for conflict with school buses and other road users. A list of applicable logistics and traffic management protocols to avoid and minimise impacts to bus routes should be provided with a commitment to avoid those times. Supported by Councils comments on TMP.</i></p>	<p>Further measures for consultation with Ogden Coaches and safety measures for school buses are included in this revision of the TMP.</p> <p>Consultation continues to be ongoing with this stakeholder and no issues have been raised.</p>	<p><b>Section 5.4</b></p>
12.	<p><i>The TMP should include an additional reference in the first paragraph of section 5.7 to clearly state it's the construction contractor or another parties responsibility for this task.</i></p>	<p>The ultimate responsibility to meet the requirements outlined in Section 5.7 sits with the Applicant.</p> <p>Table 6 of the TMP outlines the relevant responsibilities of the Applicant and construction contractor, including those outlined in Section 5.7.</p>	<p><b>Table 7</b></p>



No.	TfNSW Comment	Response	Reference Location
13.	<p><i>Further detail is required to address the employee shuttle bus service adequately. Specifically, the following elements must be finalised prior to the commencement of Stage 2 works:</i></p> <ul style="list-style-type: none"> <li><i>a. Confirmed shuttle bus routes.</i></li> <li><i>b. Designated pick-up and drop-off locations.</i></li> <li><i>c. Parking facilities for construction workers private vehicles.</i></li> <li><i>d. Timetables aligned with construction shift schedules.</i></li> </ul> <p><i>It is also noted that Council has also requested further detail regarding Section 5.6 Car-Pooling &amp; Shuttle Buses.</i></p>	<p>The TMP has been amended with details on the shuttle bus arrangements including routes, pick-up/drop-off locations, parking arrangements and timetables.</p>	<p><b>Section 5.6.2</b></p>
14.	<p><i>Further detail is required to adequately address the proposed measures for encouraging car-pooling or ride sharing among employees. The current documentation lacks sufficient information regarding:</i></p> <ul style="list-style-type: none"> <li><i>How the initiative is intended to be implemented.</i></li> <li><i>Specific measures and incentives to promote participation.</i></li> <li><i>Operational protocols and logistical arrangements.</i></li> </ul>	<p>Additional measures to encourage car-pooling have been added to this revision of the TMP.</p>	<p><b>Section 5.6.1</b></p>
15.	<p><i>The TMP does not provide formal protocols provided outlining how emergency repairs or maintenance requirements will be identified, assessed, and actioned. This should be expanded and include</i></p> <ul style="list-style-type: none"> <li><i>a. reporting, escalation, or coordination with road authorities.</i></li> <li><i>b. Monitoring mechanisms to ensure consistent observation and timely response</i></li> </ul>	<p>Additional detail has been added to this revision of the TMP in relation to emergency repairs and maintenance.</p>	<p><b>Section 5.8</b></p>
16.	<p><i>Section 5.2 Delivery Logistics, lacks sufficient detail to address the requirement for scheduling heavy vehicle movements in a manner that minimises convoy length, avoids platooning, and reduces conflict with light vehicles. Further information is required, including:</i></p> <ul style="list-style-type: none"> <li><i>a. Defined protocols for managing and staggering heavy vehicle movements.</i></li> <li><i>b. Measures to prevent convoy formation and ensure safe integration with light vehicle traffic.</i></li> <li><i>c. Monitoring mechanisms to verify compliance with daily movement limits and scheduling requirements.</i></li> </ul>	<ul style="list-style-type: none"> <li>a) There will be on-going weekly management with the Principal Contractors and their respective logistics contractors to share anticipated delivery schedules, refer Section 5.2.</li> <li>b) The sharing of information between the Principal Contractors, along with the measures outlined in the TMP will minimise convoy lengths, platooning and interaction with light vehicles.</li> <li>c) Daily vehicle logs are to be recorded (refer response to comment No. 1)</li> </ul>	<p><b>Table 7, Section 5.2</b></p>



No.	TfNSW Comment	Response	Reference Location
	<p><i>d. Identification of the responsible party or authority overseeing implementation and enforcement.</i></p> <p><i>e. Evidence or documentation supporting the proposed approach, including traffic management plans, scheduling tools, and coordination procedures.</i></p>	<p>d) The ultimate responsibility for the implementation and enforcement of measures is the Applicant.</p> <p>e) Actions from coordinated measures between the Principal Contractors will be recorded as weekly meeting minutes and provided on request.</p>	
17.	<p><i>Provide evidence that the procedures for managing adverse weather conditions have been formally incorporated into the Driver's Code of Conduct</i></p>	<p>The Primary Driver Code section of the Driver's Code of Conduct has been updated to reflect measures outlined in Section 5.7</p>	<p><b>Appendix A – Primary Driver Code</b></p>
18.	<p><i>To ensure that drivers adhere to the designated transport routes and speed limits; TfNSW recommend strengthen compliance measures to be consideration for example:</i></p> <p><i>a. GPS tracking or route verification tools.</i></p> <p><i>b. Speed monitoring systems or spot checks.</i></p> <p><i>c. Clear escalation procedures for non-compliance.</i></p> <p><i>d. Evidence of audit schedules and enforcement logs.</i></p>	<p>The recommendations are acknowledged however the mitigation and monitoring measures outlined in this TMP are suitable and are consistent with similar projects in NSW.</p> <p>Any non-compliance with the TMP and Driver Code of Conduct will be investigated and disciplinary action taken.</p> <p>Audits of the TMP to be provided to Council or TfNSW upon request.</p>	<p><b>Appendix A – Disciplinary Procedure Section 8.1 and 9.4</b></p>
19.	<p><i>The Department of Planning, Housing and Infrastructure would be satisfied with the following matters within the drivers code of conduct.</i></p> <p><i>a. Adequate information has been provided to address Driver Fatigue</i></p> <p><i>b. Adequate work has been completed to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. In particular</i></p> <p><i>i. Structured Training Program:</i></p> <p><i>ii. Assessment and Certification:</i></p> <p><i>iii. Refresher Training:</i></p> <p><i>iv. Record-Keeping:</i></p>	<p>Noted</p>	<p>-</p>



Records of the feedback received from the authorities are provided for reference in Appendix C.

## 1.5.1 Restricted Construction Activities

Feedback was sought via phone and email from the TfNSW Development Renewables on the restricted construction activities prior to the final completion of the site access. Copies of the email correspondence are included for reference in Appendix G. The Development Renewables team requested further information for inclusion in an updated TMP which is summarised along with a response in Table 6.

**Table 6: TfNSW Comments on Restricted Construction Activities and Response**

TfNSW Comment	Response
<i>In order to progress this matter, TfNSW requests the submission of an updated Traffic Management Plan (TMP) that addresses the following:</i>	This Document
<i>Design vehicle details and swept-path assessments for all intended movements.</i>	Standard semi-trailers, truck and dogs and smaller non-articulated trucks, consistent with road upgrade works, will be used for restricted construction activities prior to the final completion of the main site access.  The BAL/BAR is being completed to safely accommodate 26m B-Doubles (being the relevant design vehicle) on TfNSW approved IFC drawings.
<i>The specific TGS plans proposed for use during the restricted works period, prepared in accordance with the Austroads Guide and the NSW Traffic Control at Work Sites Manual.</i>	The approved TGS involves qualified traffic controllers that safely manage traffic entering and departing the works zone.  The level of traffic generated by the restricted construction traffic can be safely accommodated under the existing traffic control arrangements of the approved TGS.
<i>Construction staging and access management details, including coordination arrangements with the Principal Contractor delivering the BAL/BAR upgrade</i>	Measures will be implemented to safely manage access through daily coordination between the three principal contractors, refer Section 3.5.1.
<i>ROL amendments, if required, reflecting the actual conditions that will apply during the restricted works period.</i>	Noted.

Feedback was also sought from Council representatives as shown in Appendix G. Council advised that they are open to the interim measures strictly in accordance with the details nominated in the restricted construction schedule and activities shown in Appendix F.

## 1.5.2 Previous TMP Stages

The Stage 1 TMP was formally approved on 29 April 2025.

## 2. Existing Conditions

### 2.1 Site Location

The Project Area is located at 696 Castlereagh Highway (the site), approximately 6.5 kilometres northwest of the township of Gulgong. Situated on Lots 101 and 102 on the northeast side of Castlereagh Highway, it lies within the Central-West Orana (CWO) Renewable Energy Zone (REZ) of New South Wales. Figure 2 shows the location of the site in relation to the surrounding transport network.

Figure 2: Site Location



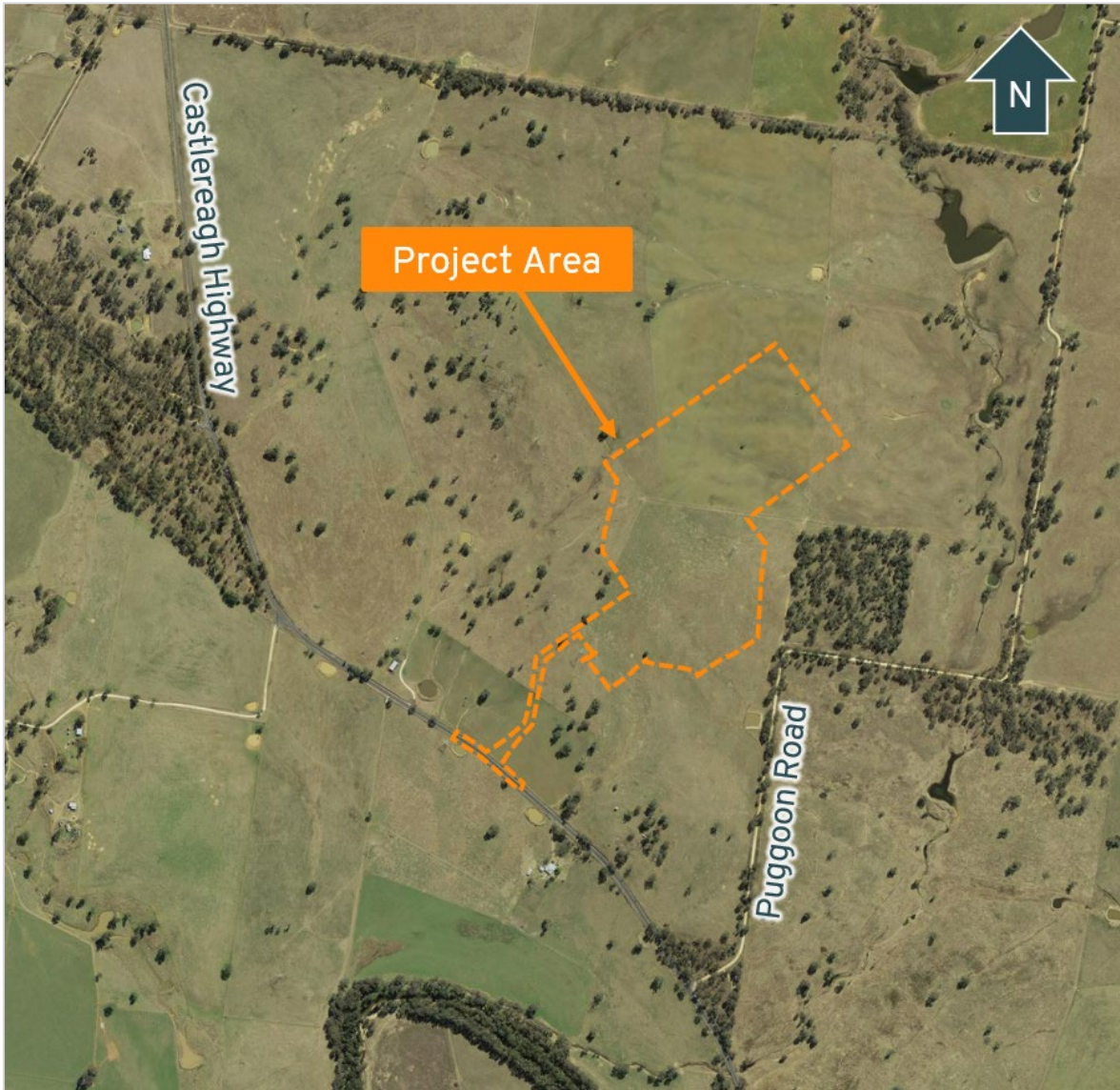
Source: OpenStreetMap

The figure shows the site is well connected with the surrounding State Road network with Castlereagh Highway running past the site which provides access to the nearby towns of Gulgong, Dunedoo and Mudgee.

The site and surrounding areas are zoned RU1 - Primary Production and are primarily occupied by agricultural or vegetated land. Land further to the south is zoned R5 - Large Lot Residential.

Figure 3 provides an aerial photograph of the site and the surrounding area.

Figure 3: Aerial Photograph of Site and Surrounding Area



Source: SixMaps

## 2.2 Road Network

**Castlereagh Highway** is a State Road that runs in a general northwest-southeast alignment between its intersection with Golden Highway near Dunedoo (northwest) and its intersection with Great Western Highway near Wallerawang (southeast). In the vicinity of the site, it has a speed limit of 100 km/h and a sealed carriageway width of approximately 8.0m accommodating one lane of traffic in each direction with sealed shoulders and grassed verges on both sides of the road.

**Puggoon Road** is a local road that runs in a general northeast-southeast alignment between its intersection with Barneys Reef Road (northeast) and its intersection with Castlereagh Highway (southwest). Near the site it has a default rural speed limit of 100 km/h and an unsealed carriageway width of approximately 5.0m accommodating two-way vehicle movement and grassed verges on both sides of the road.

## 2.3 Traffic Volumes

The Traffic Impact Assessment<sup>3</sup> (TIA) previously prepared by EMM Consulting Pty Ltd included a pneumatic tube count survey undertaken on Castlereagh Highway near the site for a seven-day period between 19 June 2021 to 26 June 2021. These volumes were also verified by an EMM Traffic Engineer on-site as in September 2022 as outlined in the Response to TfNSW matters<sup>4</sup>.

The data indicated that the average bidirectional traffic volume was approximately 1,400 vehicles per day, which was split evenly between northwest bound and southeast bound vehicles. This indicates Castlereagh Highway experiences a relatively low level of daily traffic for its road classification.

## 2.4 Restricted Vehicle Access

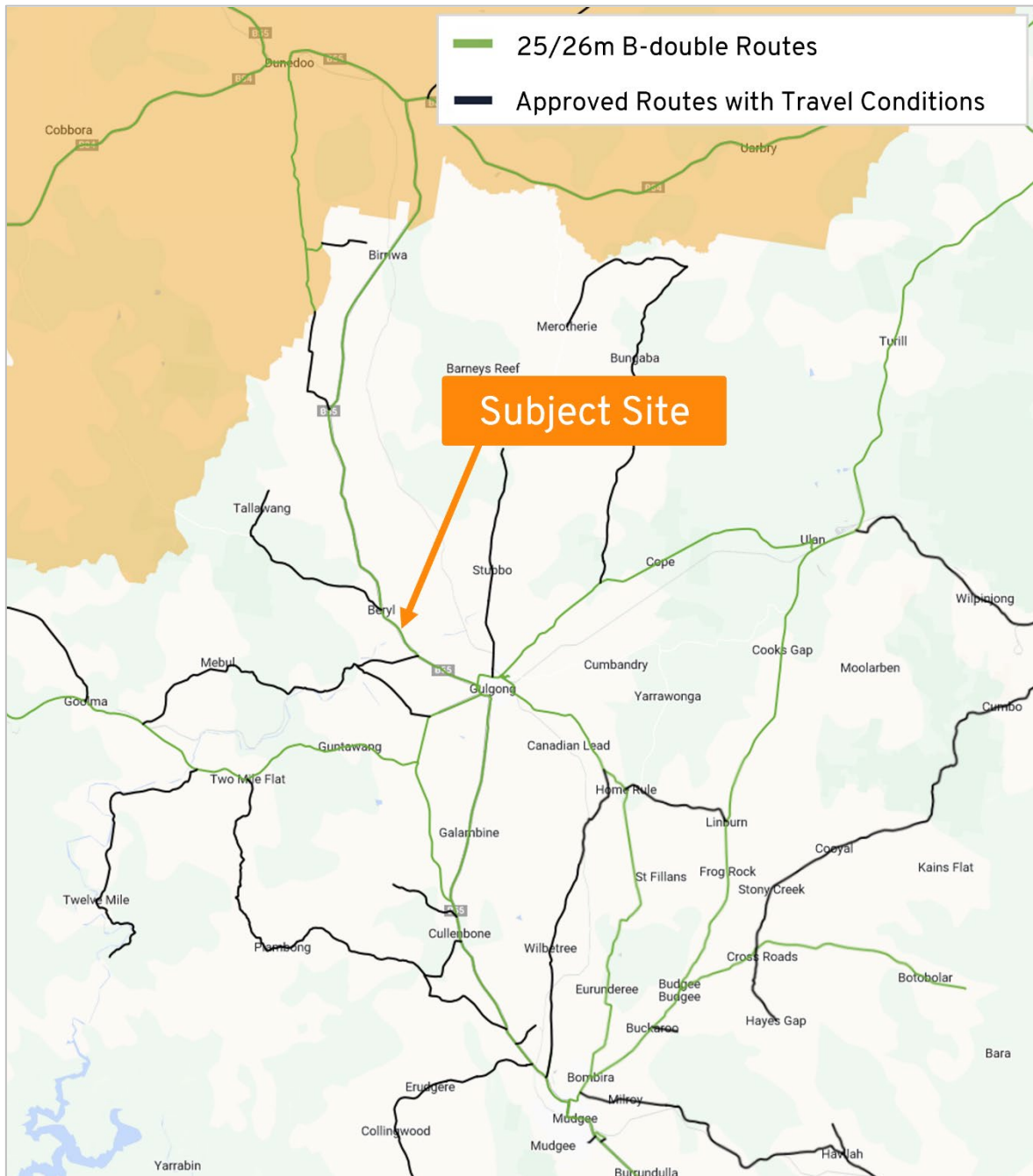
### 2.4.1 B-Doubles

The NHVR Restricted Access Vehicle Map for the surrounding area is provided within Figure 4. The green lines indicate approved B-Double routes while the black lines represent approved routes with travel conditions. The figure shows that Castlereagh Highway and the surrounding State Road network are B-Double approved routes. Accordingly, the site has access to the B-Double approved road network via Castlereagh Highway.

<sup>3</sup> Addendum Traffic Impact Assessment, EMM Consulting Pty Ltd, dated 30 November 2023.  
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-33344237%2120230807T121633.166%20GMT>

<sup>4</sup> Response to TfNSW Matters, EMM Consulting Pty Ltd, dated 22 April 2024.  
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=RFI-66927476%2120240422T232513.983%20GMT>

Figure 4: NHVR 26m B-Double Network Approved Roads



Source: NHVR Restricted Access Vehicle Map

## 2.4.2 Class 1 OSOM Vehicles

The NHVR Oversize Overmass (OSOM) Load Carrying Vehicles Network map for the surrounding area is provided within Figure 5. The map shows approved routes for eligible vehicles operating under the Multi-State Class 1 Load Carrying Vehicles Mass and Mass Exemption Notices. A summary of the allowances under each exemption within New South Wales is provided below:

- Dimension: up to 5.5m wide, 5.0m high, 35.0m long and 7.5m rear overhang on approved (state owned) routes in NSW.

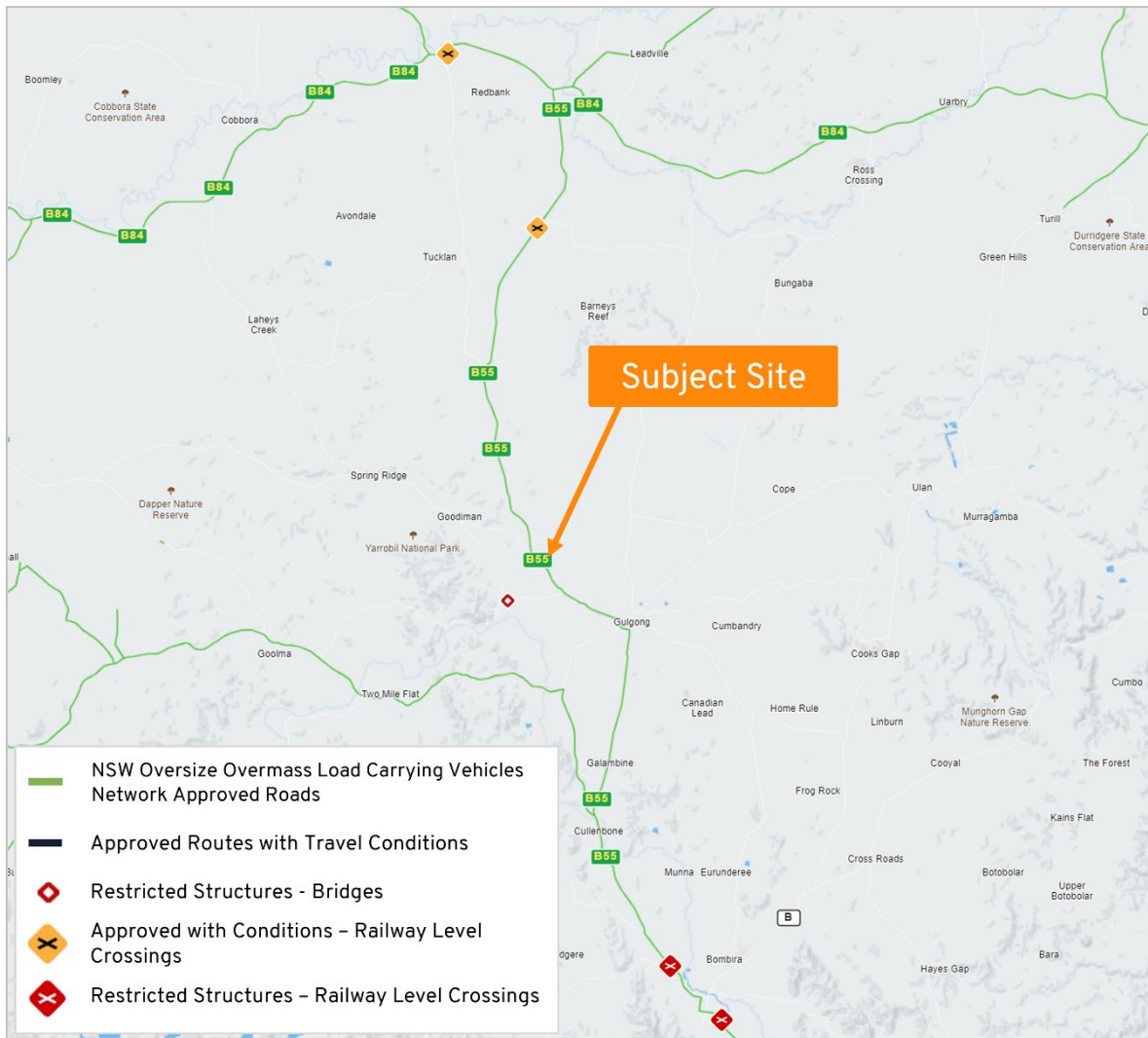
- Mass: up to 115.0 tonnes for rows of 8 tyres low loaders and up to 77.5 tonnes for rows of 4 tyres low loader combinations.

Vehicles operating in the daytime and not exceeding 3.5m wide or 26m long generally do not require a pilot or escort vehicle.

The green lines indicate approved Class 1 OSOM Vehicle routes.

Accordingly, the site has access to the Class 1 OSOM approved road network via Castlereagh Highway.

Figure 5: NHVR Class 1 Oversize Overmass Load Carrying Vehicles Network Approved Roads



Source: NHVR Restricted Access Vehicle Map

## 2.5 Public Transport Services

There are NSW TrainLink coach services which travel along Castlereagh Highway. The coach services operate between Lithgow and Coonabarabran and between Lithgow and Baradine, in both directions.

Two school bus routes operate past 696 Castlereagh Highway which are operated by Ogden's Coaches. The S307 Laheys Creek and S305 Tucklan each travel past the site at 8:30-8:40am and 3:45-3:55 pm on school days.

The nearest stops and school routes near the site are shown in Figure 6.

Figure 6: School Bus Routes and Stops



Source: Ogden Coaches

Ogden Coaches are to be contacted prior to construction to confirm the school bus information is still accurate. Consultation with Ogden Coaches is currently ongoing for the BAL/BAR road upgrade.

Contact details are provided below:

- Name: Phillip Cooper
- Phone: 02 6372 2489
- Email: phillip@ogdenscoaches.com.au

## 3. Construction Overview

### 3.1 Project Description

The Project will involve the construction and operation of a major grid-scale battery project immediately adjacent to Transgrid's Wollar to Wellington 330 kV transmission line. The project will have a generation capacity of approximately 408 MW and approximately 816 MWh storage capacity.

Key development and infrastructure components will include<sup>5</sup>:

- BESS compound – comprising battery enclosures/containers (lithium-ion (Li-ion) or similar batteries inside battery enclosures/containers), power conversion systems and ancillary infrastructure, operation and maintenance buildings and spare parts warehouses.
- Substation and switching yard –comprising two 330/33 kilovolt (kV) transformer bays including oil retention bunds, indoor medium voltage switchgear units and control rooms housed in buildings and other ancillary infrastructure, high voltage switchgear, current and voltage transformers, a control room and other high voltage electrical equipment.

Vena Energy has appointed Samsung as the Principal Contractor to construct the battery energy storage system.

Transgrid has appointed CPP as the Principal Contractor to construct the substation and switching yard.

### 3.2 Stage 2 Works

This Stage 2 TMP applies to the construction and commissioning of the above infrastructure.

Heavy vehicles requiring escort/pilot (including High Risk OSOM vehicle combinations) will be included as part of the Stage 3 TMP.

### 3.3 Construction Schedule

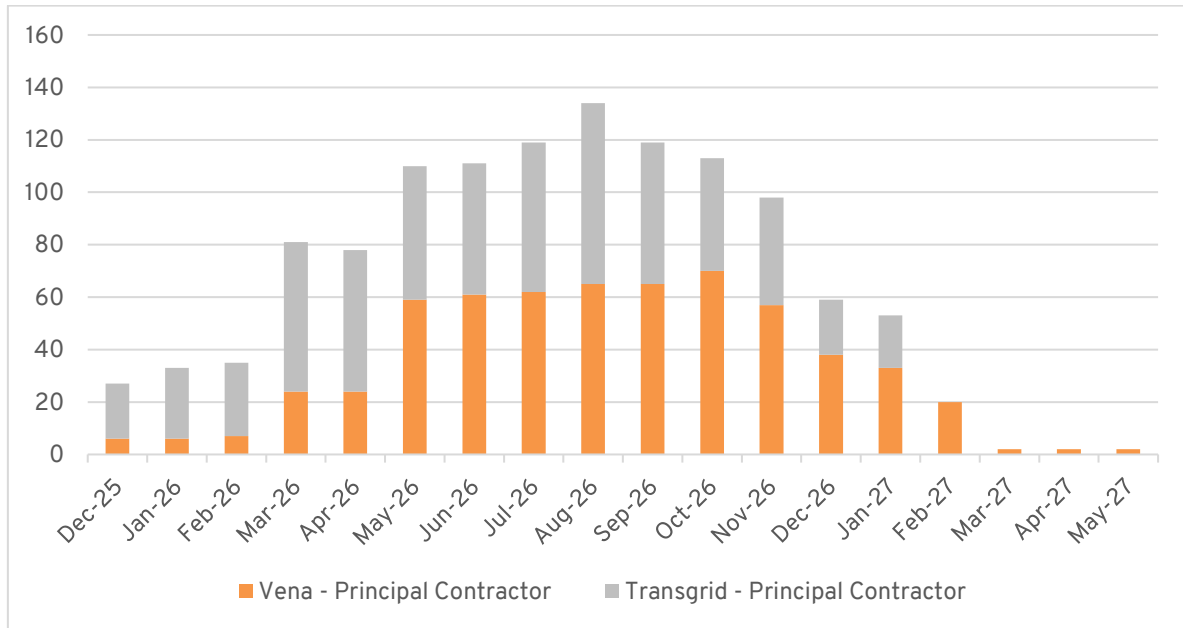
The anticipated construction schedule and peak workforce from the commencement of Stage 2 in January 2026 is shown in below in Figure 7.

Interim restricted construction activities are to occur in Stage 2 as outlined in Section 1.3.1 and Appendix F.

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<sup>5</sup> Per summary in Addendum Traffic Impact Assessment, EMM Consulting Pty Ltd, dated 30 November 2023.

Figure 7: Construction Schedule and Workforce



Source: Vena

The figure shows an anticipated peak construction workforce of 134 personnel in August 2026.

### 3.4 Traffic Generation

In accordance with Condition B1 of the development consent, traffic volumes are to be managed so that the development does not generate more than:

- 40 heavy vehicle movements a day, and
- 20 light vehicle movements and 4 heavy vehicle movements between the hours of:
  - 6am to 7am
  - 7am to 8am
  - 8am to 9am, and
  - 5pm to 6pm

Heavy vehicle lengths are not to exceed 26 metres.

The responsibilities and measures to manage and record the traffic movements generated by the development are outlined in Sections 4, 5 and Table 9 below.

#### 3.4.1 Shuttle Buses

In order to ensure that light vehicle volumes do not exceed 20 movements in the peak hours, shuttle buses will be used to transport the construction workforce to and from the site.

The proposed shuttle bus routes and pick-up / drop-off locations for the respective Principal Contractors are outlined in Section 5.6.2.



### 3.5 Vehicle Access Routes

The access routes for all vehicles are shown in Figure 8. All vehicles will access the site via this route.

Figure 8: Vehicle Access Route



Source: OpenStreetMap

Condition B3 of the Development Consent requires that all heavy vehicles associated with the development must travel to and from the site via Golden Highway and Castlereagh Highway north of the development, or Castlereagh Highway south of the development. These routes are to be complied with at all times.

#### 3.5.1 Restricted Construction Activities and Management

To safely manage access for restricted construction activities prior to the final completion at the main site access (as outlined in Section 1.3.1, Appendix F) the following measures are to be implemented:

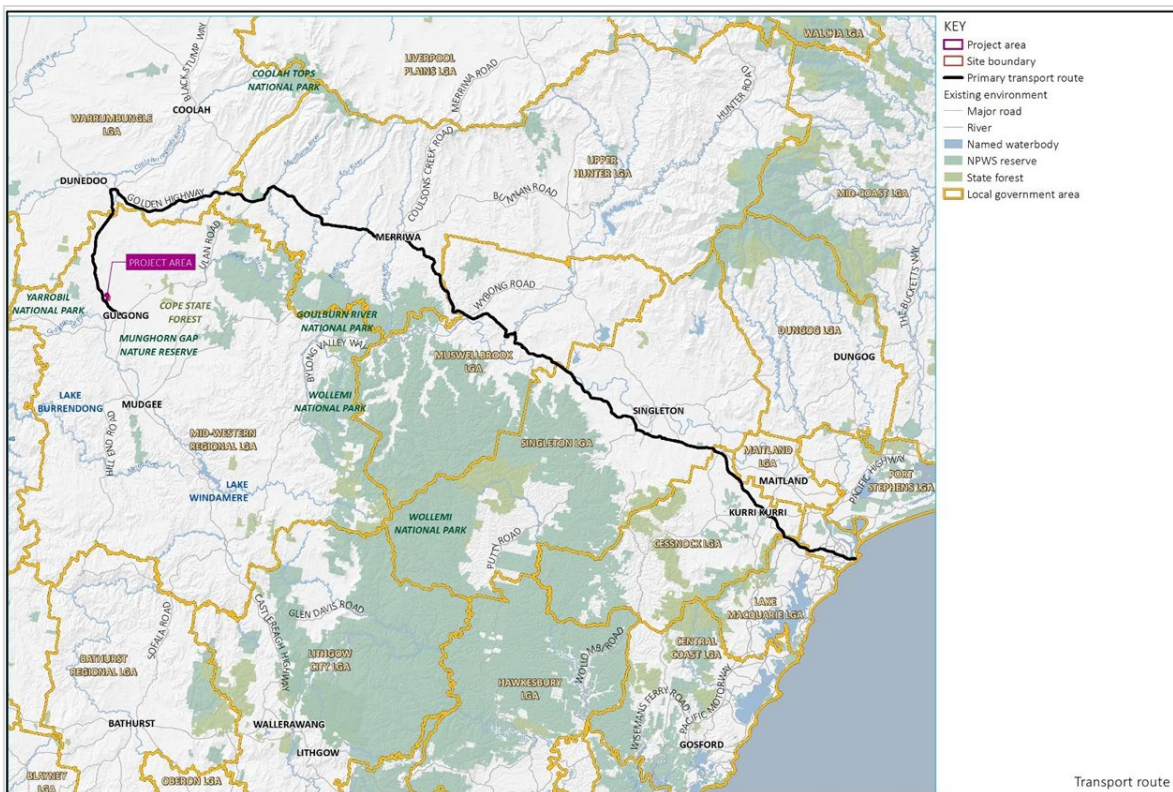


- All construction vehicles to access the site under traffic control, consistent with the TGS and ROL requirements.
- All construction vehicle drivers that regularly access the site are to complete a site induction to confirm understanding of the interim access arrangements. Drivers must know the designated access routes and follow all applicable speed limits, traffic guidance signs and traffic controller directions.
- Construction contractors must contact the road upgrade contractors (A1 Earthworx) daily to advise on delivery schedules and suitably coordinate to ensure that access for all motorists is safe and the works on the main site access are suitably prioritised.
- Drivers must maintain radio contact using UHF 14 for internal access roads and UHF 15 for access from the Castlereagh Highway.

### 3.5.2 Principal Haulage Route

The principal haulage route for heavy vehicles travelling to site from the Port of Newcastle is shown in Figure 9.

Figure 9: Principal Haulage Route



Source: Consolidated Consent

The principal haulage route is to be used by all heavy vehicles travelling between the Port of Newcastle and site.

### 3.5.3 Other Local Roads

In the event that local roads in Mid-Western Regional Council are used for heavy vehicle haulage movements for the project, Council would be consulted.



## 4. Traffic Management Responsibilities

Vena as the Applicant has the ultimate responsibility to ensure the development is built in accordance with the Development Consent, and by extension, this TMP. However, there are also key responsibilities for measures in this TMP that fall to Vena's Principal Contractor and Transgrid's Principal Contractor, as well as every individual driver the travels to and from the site.

A summary of the assignment of responsibilities to the respective parties for all measures and commitments made in this TMP are presented in Table 7.

**Table 7: Assignment of TMP Responsibilities**

Measure	Designation of Responsibility
<b>Vehicle Restrictions</b>	
Traffic volumes are to be managed so that the development does not generate more than 40 heavy vehicle movements a day or, in any hour, more than 20 light vehicle movements and 4 heavy vehicle movements.	Vena
Maintain accurate daily records of all vehicle movements to and from the site, including vehicle classification (light, heavy, OSOM not requiring escort/pilot, OSOM requiring escort/pilot); time of arrival and departure and the direction (north/south) the vehicle was travelling from/to. Arrivals and departures to be recorded by the Traffic Access Controller in a Gate Log.	Vena
<b>Routes and Access</b>	
All vehicles must enter/leave the site by the new BAL/BAR access.	Vena, both PCs and all drivers
All heavy vehicles associated with the development must travel to and from the site via Golden Highway and Castlereagh Highway north of the development site, or Castlereagh Highway south of the development.	Vena, both PCs
Weekly coordination meetings for heavy vehicle delivery schedules with actions identified and recorded	Vena, both PCs
Pre-engagement with delivery contractors to ensure approved routes are known.	Both PCs
Record and document staff private vehicle use, encourage car-pooling and shuttle bus use.	Both PCs
All internal roads (new and existing) are to be maintained as all-weather roads and fit-for-purpose throughout construction.	Vena, both PCs and all drivers
Council is to be notified of any road-related incidents or emergency traffic management measures.	Vena
Council to be consulted in the event that local roads in Mid-Western Regional Council are proposed to be used for heavy vehicle haulage movements.	Both PCs
The cumulative impact of the use of Spring Ridge Road as a shuttle bus route monitored and re-routed via Dunedoo if required.	Vena and Transgrid's PC
<b>Driver Code of Conduct</b>	
All drivers that will regularly access the site must be inducted on the requirements of this TMP and sign the Drivers Code of Conduct confirming they understand their obligations.	Vena, both PCs and all drivers
<b>Environmental Management</b>	
Vehicles must arrive/leave clean.	Vena, both PCs and all drivers
Vehicles entering/exiting with materials must be covered.	Vena, both PCs and all drivers
The Castlereagh Highway will be monitored daily and cleaned of any deposited mud, as required, and in accordance with TfNSW/Council requirements including traffic control measures.	Vena, both PCs and all drivers
A rumble/shaker grid to be positioned in the site access road near the entry gates.	Vena
On-site speed restrictions <20 km/hr will be enforced.	Vena, both PCs and all drivers
Appropriate dust suppression measures be implemented.	Vena
Loading and unloading and material storage will only occur within the site.	Vena, both PCs and all drivers
Ensure vehicles do not park on the surrounding road network by providing shuttle buses for staff and on-site parking.	Vena, both PCs and all drivers
All opportunities for use of shuttle buses and car-pooling will be continually encouraged and communicated to staff on induction and at daily toolbox meetings.	Both PCs
Adverse weather conditions will be monitored and communicated at daily tool boxes.	Vena, both PCs and all drivers
Unless the Planning Secretary agrees otherwise, construction may only be undertaken between 7 am to 6 pm Monday to Friday; 8 am to 1 pm Saturdays; and at no time on Sundays and NSW public holidays.	Vena, both PCs and all drivers
Key staff to observe road condition on the commute to and from site and share findings at daily start-ups and tool boxes. Any observed damage, maintenance or safety issues is to be reported to the relevant road authority.	Vena, both PCs and all drivers
The drain at the site access is to be monitored to ensure that it is functioning in a suitable manner. Any issues are to be repaired in consultation and in accordance with the requirements of Council and TfNSW.	Vena
<b>Consultation</b>	
Provide Council with regular updates on the construction schedule.	Vena
Provide monthly updates of the construction schedule on the project website.	Vena
Ensure suitable communication and consultation with any affected neighbour or local stakeholder is maintained.	Vena
Weekly consultation with Ogden coaches and any feedback and/or actions to be taken recorded.	Vena
<b>Scheduling</b>	
Monitor closely the status of other projects, including Tallawang Solar Farm and ACEREZ, to anticipate and identify opportunities for avoiding/minimising cumulative impacts. Records of the monthly consultation to be provided to Council and TfNSW, upon request.	Vena
Ensure transport companies and logistics contractors are aware of the requirements of the TMP, projects in construction in the Central West Orana, and need to minimise impacts during important community events (e.g. Gulgong Folk Festival, Gulgong Annual Show, NRL Round and the Mudgee Classic). This includes a monthly review of the Mid-Western Regional Council Events webpage.	Both PCs
Schedule deliveries to ensure vehicle movements do not form convoys or platoons.	Both PCs
Schedule deliveries to minimise impacts and interaction with school buses.	Both PCs
Schedule deliveries cognisant of latent weather conditions such as fog, dust, wet weather and flooding.	Both PCs



Measure	Designation of Responsibility
<b>NHVR Permits</b>	
As required, obtain Heavy Vehicle National Law (NSW) permits for the use of heavy vehicles requiring escort and ensure suitable protocols are followed logistics contractors.	Both PCs
<b>Complaints Management</b>	
Managed in accordance with approved EMS feedback mechanism for the community to lodge enquiries or register complaints. Accessed via project website and hotline.	Vena
<b>Auditing</b>	
An audit of the effectiveness of the TMP will be undertaken on a monthly basis, opportunities for improvement documented and then implemented. Audit reports to be provided to MWRC, on request.	All
Independent Environmental Audits will be conducted in accordance with the requirements of the Development Consent.	Vena
<b>Reporting</b>	
The Department must be notified in writing via the Major Projects website immediately after Vena becomes aware of an incident. The notification must identify the development , the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5 of the Development Consent.	Vena
The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. The notification must identify the development, the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Vena
Mid-Western Regional Council must be notified of any road-related incidents or emergency traffic management measures.	Vena
<b>Plan Update</b>	
Review and if necessary, revise this TMP to the satisfaction of the Planning Secretary within 1 month of submission on an incident report or audit report.	Vena



## 5. Traffic Management Strategy

The follow section outlines the key management strategies and measures to be implemented as part of the TMP. The responsibilities for the measures are collated and summarised in Section 4 above.

### 5.1 Driver Protocols

Management of vehicular access to and from the site is essential to maintain the safety of the general public as well as the labour force. Exemplar driver protocols are to be implemented and a driver code of conduct established. The Driver's Code of Conduct is provided within Appendix A. All drivers that regularly visit the site are required to read, agree to and sign the Driver's Code of Conduct prior to entering the site.

The following measures will be implemented:

- Mandatory site induction given to all workers on the site which clearly sets out the TMP requirements including approved routes, speed restrictions and the Driver Code of Conduct.
- Pre-engagement with delivery companies to ensure information on approved routes are known and understood before commencement of journey.
- Monitoring complaints, safety issues and near misses.
- Undertake improvements in driving behaviour to address any identified issues.

### 5.2 Delivery Logistics

The following measures will be implemented:

- Maintain accurate daily records of all vehicle movements to and from the site, including vehicle classification (light vehicle, shuttle buses, heavy vehicles, OSOM vehicles not requiring escort/pilot, OSOM vehicles requiring escort/pilot), time of arrival and departure and the direction (north/south) the vehicle was travelling from/to.
- Ensuring that the maximum number of heavy vehicle movements per day is adhered to.
- Ensure construction drivers/staff must be provided a copy of assigned haulage routes.
- Monitor local community events, including monthly review of the Mid-Western Regional Council Events Directory webpage (<https://www.midwestern.nsw.gov.au/Community/Events-directory>) to ensure the impacts of haulage movements are minimised.
- Schedule deliveries outside periods if significant increases of traffic are expected on the access route.

Transport companies are to be liaised with to ensure major deliveries are minimised:

- during peak hours and to avoid conflict with local traffic
- during constriction peaks associated with other state significant projects including the Tallawang Solar Farm
- during any major events, including large local events,
- any school zones during peak school times, and
- during latent weather conditions such as fog, dust, wet weather and flooding.

Delivery schedules are to be regularly shared at weekly meetings between the Principal Contractors and adjustments made to minimise convoys, platooning and interaction with light vehicles. Actions arising from meetings between the Principal contractors will be recorded as meeting minutes and provided on request.

A site office is to be positioned adjacent to the main access and entry gates which is to be staffed by the Traffic Access Controller who will be responsible for monitoring and managing all entering and departing vehicles via a Gate Log.

### 5.2.1 Cumulative Impacts

Liaison will be undertaken with nearby State significant projects (including Tallawang Solar Farm and ACEREZ) on a monthly basis during construction to anticipate and identify opportunities for avoiding/minimising cumulative impacts.

Records of consultation will be kept and shared with Council and TfNSW upon request, and construction traffic scheduling will avoid coinciding peak periods where feasible.

## 5.3 Information and Communications

Consultation will be undertaken to ensure local stakeholders are aware of the construction activities. This program will include elements of the following as appropriate:

- Neighbour consultation and neighbour meetings.
- Provision of a website providing monthly updates of the construction schedule and contact details for any complaints or enquiries, on the project website.
- Provide Council with regular updates on the construction schedule.
- Provide key contact personnel and contact details, including out of hours contact information to residents.

## 5.4 School Buses and Public Transport

Where possible, schedule movements to occur outside of school bus service times to prevent larger vehicles interacting with school buses. Specifically, departing heavy vehicles will be held on-site to avoid expected school bus operating times (8:30-8:40am and 3:45-3:55 pm on school days).

The Traffic Access Controller will seek weekly feedback from Ogden Coaches during the school year and record any feedback and/or actions to be taken.

Ongoing consultation is to be maintained with Ogden Coaches during construction with regard to the school bus service.

All drivers are to be reminded of the requirements of the Driver Code of Conduct related to school buses, as follows:

- *Drivers must reduce their speed and or stop in accordance with the law when passing a school bus which is slowing down, stopped, or accelerating in relation to picking up or setting down children. Two school bus routes operate past the site and each travel past the site at approximately 8:30-8:40am and 3:45-3:55 pm on school days*

- *Drivers must reduce their speed in accordance with the law when:*
  - *Passing children walking, cycling or waiting on the side of the road, and*
  - *Passing an oncoming school bus.*

## 5.5 On-Site Mitigation Measures

The following on-site traffic management measures will be implemented:

- All vehicles will enter the site through the designated access point and all vehicles will stop at security.
- On-site speed restrictions (20 km/h maximum limit).
- All internal roads are constructed as all-weather roads.
- Appropriate dust suppression measures be implemented, including:
  - Vehicles will drive at slower speeds when travelling on unsealed roads. This can reduce the amount of dust created and the amount of dirt tracked onto the public road network. Standard mitigation measures, such as a water trucks to dampen the roads and reduce the amount of dust in the air, shall be considered to reduce dust levels.
  - Vehicles entering/exiting the project loaded with materials shall be covered.
- Loading and unloading will occur within the site. No street or roads will be used for material storage at any time.
- Sufficient car parking will be provided on-site and adjacent to work areas to ensure vehicles do not park on the surrounding road network.

## 5.6 Car-Pooling & Shuttle Buses

### 5.6.1 Car Pooling

Opportunities to car-pool with other staff using private vehicles will be identified and car-pooling will be encouraged. A summary of the car-pooling opportunities will also be provided to staff at induction and toolbox meetings with posters documenting the availability of shuttle buses and car-pooling opportunities posted around the main site compound.

Should any personnel seek to use a single occupant vehicle to travel to site, justification would need to be provided and monitored.

### 5.6.2 Shuttle Buses

A total of six shuttle bus routes are to be used for the Principal Electrical and Civil Contractors, and Transgrid's Contractors, as summarised in Table 8 below. 12-seater shuttle buses will be the primary vehicle type used.



As shown in Table 8, pick-up and drop-off locations will be a mix of respective contractor depots, directly from staffing accommodation in surrounding towns, and from a private property in

Gulgong (off Perseverance Lane). Staff parking will primarily be accommodated in suitable off-street parking areas.



Information on the shuttle bus routes and drop-off and pick-up areas are to be provided to all staff, with promotion and reminders provided to staff at induction and toolbox meetings.



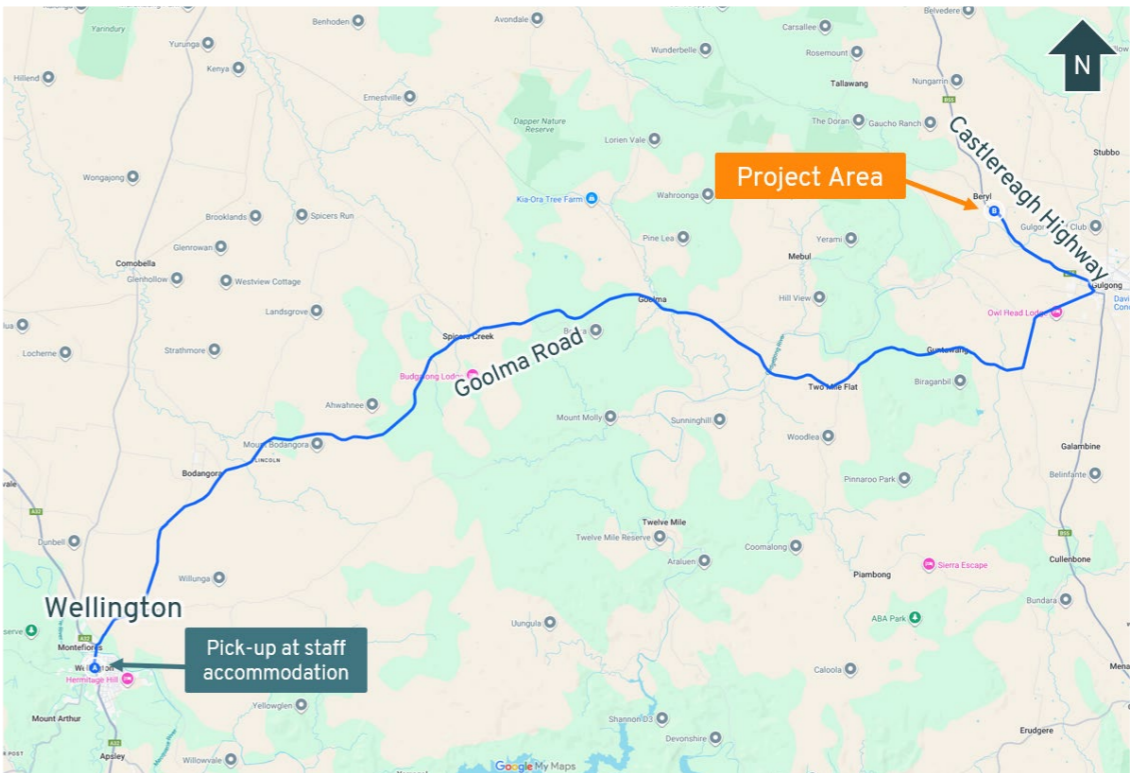
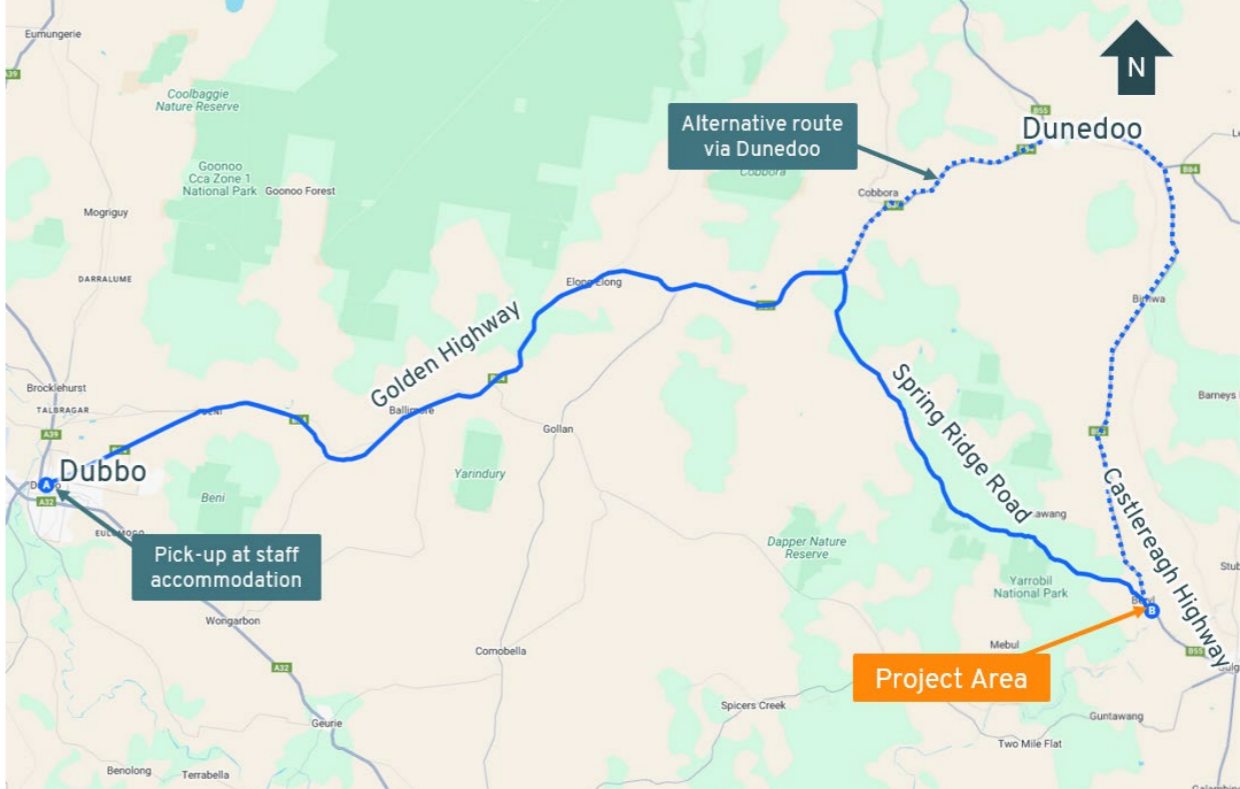
Table 8: Shuttle Bus Routes

Contractor	Route	Principal Roads Used	Approx. Schedule	Route Map
<p><b>Samsung Electrical Contractor -</b></p>	<p>Contractor Depot (Dubbo) to site with stop in Dunnedoo (staff accommodation)</p>	<p>Yarrandale Road, Bolaro Street, Golden Highway, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Dubbo 5:15am, arrive to site: 6:45am  <b>Evening:</b> Depart site 5pm, arrive at Depot 6:30pm</p>	
<p><b>Samsung - Civil Contractor</b></p>	<p>Contractor Depot (Mudgee) to site with stop in Gulgong at private property used as a parking area (Perseverance Lane)</p>	<p>Yarrandale Road, Castlereagh Highway, Goolma Road, Perseverance Lane, Goolma Road, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Mudgee 6:15am, arrive to site: 6:45am  <b>Evening:</b> Depart site 5pm, arrive at Depot 5:30pm</p>	



Contractor	Route	Principal Roads Used	Approx. Schedule	Route Map
<p><b>Transgrid – Gulgong Route</b></p>	<p>Staff accommodation in Gulgong to Site</p>	<p>Mayne Street, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Gulgong 6:15am, arrive to site: 6:30am  <b>Evening:</b> Depart site 5pm, arrive at Gulgong 5:15pm</p>	
<p><b>Transgrid – Mudgee Route</b></p>	<p>Staff accommodation in Mudgee to Site</p>	<p>Market Street, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Mudgee 6:00am, arrive to site: 6:30am  <b>Evening:</b> Depart site 5pm, arrive at Mudgee 5:30pm</p>	



Contractor	Route	Principal Roads Used	Approx. Schedule	Route Map
<p><b>Transgrid – Wellington Route</b></p>	<p>Staff accommodation in Wellington to Site</p>	<p>Mitchell Highway, Goolma Road, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Wellington 6:00am, arrive to site: 7:00am  <b>Evening:</b> Depart site 5pm, arrive at Wellington 6:00pm</p>	 <p>The map shows a route starting from Wellington, heading north on Mitchell Highway, then east on Goolma Road, and finally north on Castlereagh Highway to the Project Area. A 'Pick-up at staff accommodation' is marked near Wellington. A north arrow is present in the top right corner.</p>
<p><b>Transgrid – Dubbo Route</b></p>	<p>Staff accommodation in Dubbo to Site</p> <p><i>It is noted that the use of Spring Ridge Road for the shuttle bus route will be closely monitored for cumulative impact and if problematic, the alternate route via Dunedoo will be used.</i></p>	<p>Golden Highway, Spring Ridge Road, Laheys Creek Road, Castlereagh Highway, or                      Alternative route: Golden Highway, Castlereagh Highway</p>	<p><b>Morning:</b> Depart Dubbo 5:30am, arrive to site: 6:45am  <b>Evening:</b> Depart site 5pm, arrive at Depot 6:05pm</p>	 <p>The map shows a route starting from Dubbo, heading north on Golden Highway, then east on Spring Ridge Road, and finally north on Castlereagh Highway to the Project Area. An alternative route via Dunedoo is also shown. A 'Pick-up at staff accommodation' is marked near Dubbo. A north arrow is present in the top right corner.</p>

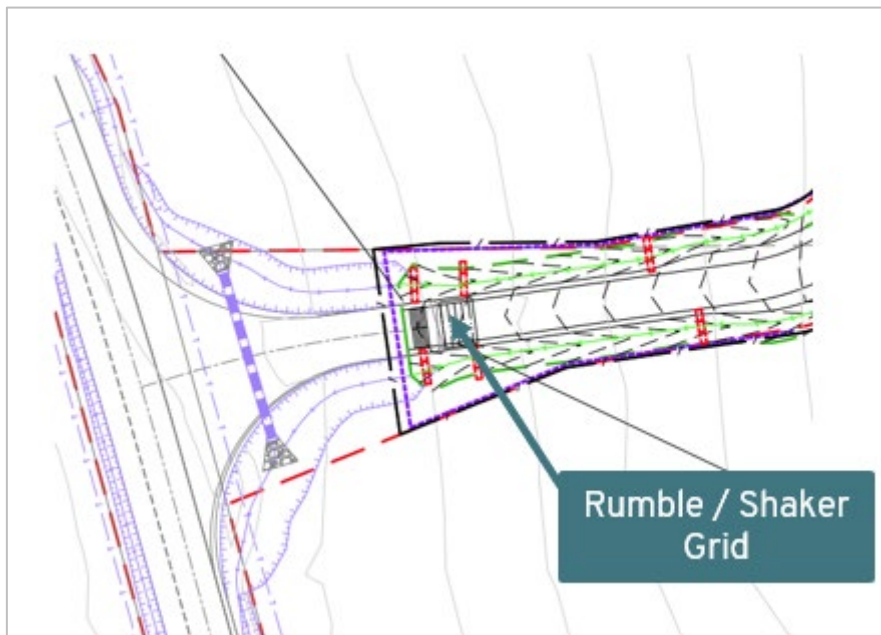


## 5.7 Environment Management

Vehicles leaving the site will be in a clean condition prior to leaving the site to minimise dirt being tracked onto the public road network. It will be all driver's responsibility to ensure vehicles are in a clean condition prior to leaving the site. Vehicles will be inspected by individual drivers.

A rumble/shaker grid is also to be positioned in the site access road down near the entry gates, outside the road corridor, as shown in the extract of the site plans in Figure 10.

Figure 10: Rumble / Shaker Grid Location



Source: Extract of Overall Site Plans

At regular intervals and/or as required as an outcome of a site inspection material (mud, gravel) that has been deposited onto the public road network as a result of project activities will be cleaned, either via sweeping or wash down. This would be subject to the implementation of appropriate traffic management measures (signage, personnel etc.) to ensure the safety of members of the public and the road cleaning crew.

New drainage associated with the BAL/BAR treatment at the site access will be monitored to ensure that it is functioning in a suitable manner. Any issues are to be repaired in consultation and in accordance with the requirements of Council and TfNSW.

## 5.8 Emergency Repair or Maintenance Requirements

Road conditions are to be observed on the commute to and from the site and findings shared at daily start-ups and tool boxes. Any observed damage, maintenance or safety issues is to be reported to the relevant road authority.

In the event that emergency road repairs or maintenance are required as a result of construction activities or incidents:

- The applicable Principal Contractor representative must promptly assess the extent and risk to road users and implement temporary traffic control measures in accordance with the *TfNSW Traffic Control at Work Sites Manual (2023)*.
- TfNSW and/or the relevant local Council to be contacted to obtain the necessary permits and approvals prior to undertaking any repair work, except where immediate action is required to protect public safety.
- Where urgent works are required, interim safety measures (e.g. delineation, signage, barriers) may be installed pending formal approval, followed by full repair under an approved Traffic Guidance Scheme (TGS).
- All incidents and emergency repair activities must be recorded in the incident register and reported to relevant TfNSW and/or Council representatives within 24 hours.

## 5.9 Adverse Weather Conditions

Due to the location of the site, there is an inherent risk that adverse conditions may impact on the movement of transportation vehicles and transport of staff. Consideration for driving in the rain, fog, frost, icy conditions, bright sunlight, flood conditions, and within/near a bush fire is required. If adverse weather conditions are expected for the following day or days, staff will be informed through daily toolbox talks conducted by supervisors and advised to drive to the road conditions in accordance with the Driver's Code of Conduct.

## 5.10 Emergency Access and Management

In the event that the Castlereagh Highway is closed, construction access will be impacted accordingly. Safe travel routes to and from site are to be followed at all times.

Council is to be notified of any road-related incidents or emergency traffic management measures.

## 6. Temporary Traffic Management

As the main site access will be upgraded and construction works are undertaken on-site, temporary traffic management on the external road network is not anticipated to be required.

However, in the unlikely event that temporary traffic management is required, the measures outlined below are to be followed.

### 6.1 Hazard Identification, Risk Assessment and Control

In establishing adequate controls for the hazards, a structured approach shall be adopted via the use of the hierarchy of control as outlined below:

- Elimination
- Substitution
- Engineering
- Administration
- Personal Protection Equipment

Traffic management practices require that the applicable project manager (the project manager managing the works that require the traffic management) evaluate all traffic arrangements before they are open to traffic and immediately following the opening to traffic. Adjustments are to be made as required and recorded, including reasons for the changes.

### 6.2 Traffic Guidance Schemes

#### 6.2.1 Restricted Construction Activities

As outlined in Section 3.5.1 access for restricted construction activities prior to the final completion at the main site access (as outlined in Section 1.3.1) is to be undertaken under traffic control, consistent with the TGS and ROL requirements and the measures described in Section 3.5.1.

#### 6.2.2 Main Stage 2 Works

Traffic Guidance Schemes (TGSs) and Road Occupancy Licences (ROLs) may be required during main Stage 2 works in the unlikely event the external road network is impacted (such as emergency works, unplanned incidents etc).

If TGSs are required, diagrams showing sign placement, spacing, and sequencing will be appended to the TMP.

All devices will comply with the relevant Australian Standards (AS 1742.3:2019) and TfNSW *Traffic Control at Work Sites* guidelines.

If the TGS is likely to impact traffic flow, an ROL is to be obtained from the relevant road authority (refer <https://www.transport.nsw.gov.au/operations/roads-and-waterways/business-and->

[industry/road-occupancy-licences](#) for the procedures and process for impacts to roads managed by TfNSW).

## 6.3 Traffic Control Devices

Traffic control devices shall be erected in accordance with the TGS. Should the use of additional (not shown on the TGS or listing of devices) or reduced number of devices be required due to unforeseen circumstances, they shall be recorded as a variation to the TGS, following prior approval from TfNSW. Work will not commence or continue until all signs, devices and barricades are in place and operational in accordance with the requirements of the TCP/TGS.

The signs and traffic control devices are to be removed in the reverse order of installation.

The number, type and location of signs, devices and barricades shall be to a standard not less than the requirements of AS 1742.3:2019. Devices no longer required shall be promptly and completely removed from road user's lines of sight.

### 6.3.1 Signs

Prior to the installation, all signs shall be checked for damage and cleanliness and repaired, replaced or cleaned as necessary. Signs and devices shall be erected in accordance with the locations and spacings shown on the TGS such that:

- They are properly displayed and securely mounted
- They are within the driver's line of sight
- They cannot be obscured from view
- They do not obscure other devices from the driver's line of sight
- They do not become a possible hazard to workers or vehicles, and
- They do not deflect traffic into an undesirable path

Any existing speed limit signs on the carriageway within the work site shall be covered for the duration of the works whilst temporary speed limit signs are in place.

## 7. Communicating TMP Requirements

Clear lines of communication through all levels and functions (e.g. management, staff and sub-contractors), is key to minimise impacts and achieving continual improvements in performance.

The methods of communication include induction prior to any driver arriving on-site and reinforced at daily pre-start and toolbox meetings.

### 7.1 Induction

All drivers before arriving on-site must have been inducted on the requirements of this TMP and sign the Drivers Code of Conduct confirming they understand their obligations.

All personnel entering the site are to go through a Site Induction that details the requirements of the TMP, Driver's Code of Conduct, Personal Protective Equipment (PPE), Occupational Health and Safety (OHS), and risk management procedures. All personnel wishing to enter the works zone are to be properly inducted before access is allowed.

In accordance with Condition A12 of the Development Consent, Vena will ensure that all employees, contractors (and their sub-contractors) are made aware of and are instructed to comply with the requirements in this TMP.

### 7.2 Pre-Start and Toolbox Meetings

A prestart meeting is to be conducted at the start of works, on a daily basis, and if unforeseen changes are required. Progress, hazard assessment and any new issues, information or changes are to be discussed.

## 8. Monitoring and Measurement

### 8.1 Site Inspections and Record Keeping

Vena will ensure that the TMP is implemented and evaluated for effectiveness based on inspections and monitoring of traffic movements on-site.

An audit of the effectiveness of the TMP will be undertaken on a monthly basis by Vena and both Principal Contractors, with opportunities for improvement documented and then implemented.

Daily records will be maintained of all vehicle movements to and from the site, including vehicle classification; time of arrival and departure and the direction (north/south) the vehicle was travelling from/to.

Audits will be provided to Council and TfNSW, on request.

### 8.2 Obligation to Minimise Harm

To meet the environmental performance criteria established by the Development Consent, Vena must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction of the project.

### 8.3 Incidents and Non-Compliances

#### 8.3.1 Incidents

An Incident is defined in the Development Consent as *a set of circumstances that causes or threatens to cause material harm to the environment.*

Various environmental incidents may have the potential to occur on site, which may include but not be limited to the following:

- Spills of fuels, oils, chemicals and other hazardous materials
- Unauthorised discharge from sediment basins or other containment devices
- Unauthorised clearing or clearing beyond the extent of the Project boundary or premises
- Inadequate installation and subsequent failure of temporary erosion and sediment controls
- Unauthorised harm or desecration to Aboriginal objects and Aboriginal places
- Potential contamination of waterways or land
- Accidental starting of a fire or a fire breaking out of containment
- Works done that are not covered by the Project approval, or not found to be consistent with the approval, or done without a modification of the approval
- Works undertaken that are not in accordance with the Environmental Assessment documents
- Unauthorised dumping of waste

All workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of any incidents to their site manager. The Principal Contractors must report any incident to Vena.

### 8.3.2 Non-Compliances

A Non-Compliance is defined in the Development Consent as *an occurrence, set of circumstances or development that is a breach of this consent but is not an incident.*

### 8.3.3 Incident and Non-Compliance Reporting

All workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of any incident or non-compliance to their site manager. The Principal Contractors must immediately report any incident to Vena.

The Department must be notified in writing by Vena, via the Major Projects website immediately after Vena becomes aware of an incident. The notification must identify the development, the location and nature of the incident.

Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5 of the Development Consent.

Within 7 days of becoming aware of the incident, Vena must submit written notification to the Planning Secretary via the Major Projects website that must:

- Identify the development and application number
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- Identify how the incident was detected
- Identify when the Applicant became aware of the incident
- Identify any actual or potential non-compliance with conditions of consent
- Describe what immediate steps were taken in relation to the incident
- Identify further action(s) that will be taken in relation to the incident
- Identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, Vena must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

The Incident Report must also include:

- A summary of the incident
- Outcomes of an incident investigation, including identification of the cause of the incident
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- Details of any communication with other stakeholders regarding the incident.

In accordance with Condition C11 of the Development Consent, the Planning Secretary must be notified in writing via the Major Projects website within seven days after Vena becomes aware of any non-compliance.

In accordance with Condition C12 of the Development Consent, a non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

In accordance with Condition C13 of the Development Consent, a non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

The Planning Secretary must be notified by Vena, in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. The notification must identify the development, the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

## 8.4 Complaints Management

Complaints are to be managed in accordance with the Bellambi BESS Environmental Management Strategy (EMS). In accordance with Condition C1 (d) of the Development Consent, the EMS *sets out the procedures that would be implemented to:*

- *keep the local community and relevant agencies informed about the operation and environmental performance of the development;*
- *receive, handle, respond to, and record complaints;*
- *resolve any disputes that may arise;*
- *respond to any non-compliance;*
- *respond to emergencies.*

## 8.5 Management and Monitoring Summary

A summary of the management and minoring measures is provided within Table 9.

**Table 9: Management and Monitoring Summary**

Aspect	Potential Problems	Performance Criteria	Mitigation and Control Measures	Monitoring Requirements	Responsibility	Timing	Frequency
Heavy vehicle movements	Number of vehicles exceed DC approval	Maximum limit of 40 heavy vehicle movements a day	Heavy vehicle deliveries will be scheduled to comply with this requirement. Delivery contractors to be advised of this prior to arranging any delivery to site.	Count and record number of vehicle movements	Vena Energy and Principal Contractors	Duration of construction	Daily
Light and heavy vehicle peak hour movements	Number of vehicles exceed DC approval	Maximum limit of 20 light vehicles and 4 heavy vehicle movements during peak hours	Shuttle buses to be utilised to transport the workforce to site to comply with this requirement. Heavy vehicle deliveries will be scheduled to comply with this requirement.	Count and record number of vehicle movements	Vena Energy and Principal Contractors	Duration of construction	Daily
Heavy vehicle movements	Heavy vehicle platooning / convoys	No Heavy Vehicle movements resulting in platoons / convoys greater than one vehicle	Heavy vehicle deliveries will be scheduled and staggered to avoid platoons / convoys greater than one heavy vehicles.	Count and record number of vehicle movements	Vena Energy and Contractor	Duration of construction	Daily
Weather conditions	Conditions make driving hazardous	Vehicles should not be travelling in unsafe conditions	Consider options to reduce driver risk such as temporarily halting vehicle movements, re-routing, etc.	Check weather forecast and on-site conditions	Vena Energy and Contractor	Duration of construction	Daily
Driver behaviour	Poor driver behaviour leads to incidents, accidents or near misses	No accidents	Encouraging good driver practice and reinforcing those messages during project meetings	Count and record number of incidents, accidents and near misses Ensure that all drivers have received a copy of the Driver Code of Conduct and are following the requirements.	Vena Energy and Contractor	Duration of construction	Daily
Driver behaviour	The approved route not being followed by staff and deliveries	No use of roads other than those on the approved routes by staff and delivery drivers	Checking driver routes and reinforcing the approved routes to staff and delivery drivers during project meetings	Spot check of routes taken at site entry and adjoining local roads and monitoring any feedback from the Community, Council and TfNSW	Vena Energy and Contractor	Duration of construction	Daily
Driver behaviour	Vehicles have excessive mud or dirt	Dirt transferred from the site onto the external road network to be minimised	Vehicles exiting the site are to be cleaned so that excessive mud and dirt is not transferred to external roads	Vehicles exiting the site are to be inspected (and cleaned as required)	Vehicle Driver	Duration of construction	Daily



## 9. Management and Reporting

### 9.1 TMP Review and Improvement

A review of the effectiveness of the TMP will be undertaken by the Vena on a monthly basis.

### 9.2 Update of Strategies, Plans or Programs

In accordance with Condition C2 of the Development Consent, the Vena will:

- Update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site.
- Review and, if necessary, revise the strategies, plans or programs required under the Development Consent to the satisfaction of the Planning Secretary within 1 month of the:
  - submission of an incident report under condition C10 of Schedule 4;
  - submission of an audit report under condition C14 of Schedule 2; or
  - any modification to the conditions of this consent.

As stated in Condition C2, with the approval of the Planning Secretary, Vena may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, Vena may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, Vena may submit any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.

If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program will clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.

Vena will seek the approval of the Planning Secretary when submitting any strategy, plan or program required by this consent on a progressive basis. This includes for this TMP which is to be updated for the stages as outlined in Section 1.3.

### 9.3 Notification of Department

Prior to commencing construction, the Department will be notified in writing via the Major Projects website.

### 9.4 Independent Environmental Audits

In accordance with C14 of the Development Consent, Independent Audits of the development must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements (2020)* or as updated from time to time and published on the Department's website.

The independent audits must be conducted and carried out at the frequency and in accordance with the *Independent Audit Post Approval Requirements (2020)* to the following frequency:

- within 3 months of commencing construction; and
- within 3 months of commencement of operations.

The proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition C14 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.

In accordance with the specific requirements of the *Independent Audit Post Approval Requirements (2020)*, Vena must:

- review and respond to each Independent Audit Report prepared under the conditions of consent;
- submit the response to the Planning Secretary; and
- make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.

Independent Audit Reports and Vena response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the *Independent Audit Post Approvals Requirements (2020)* unless otherwise agreed by the Planning Secretary.

Notwithstanding the requirements of the *Independent Audit Post Approvals Requirements (2020)*, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.

Audits will be provided to Council and TfNSW, on request.

## Appendix A

### Driver Code of Conduct



## Driver Code of Conduct

This Code of Conduct applies to all drivers that regularly visit the site. As part of the traffic management induction before first driving the project site they are required to read, agree to and sign the Code of Conduct.

Workers will be reminded of the requirements of the Code of Conduct weekly in toolbox meetings.

The Code of Conduct will be enforced by Vena Energy and the Principal Contractors, and records of compliance maintained.

## Safe Driving Principles

The operators of all vehicles associated with construction shall respect all other road users. Traffic induction will include:

- Details regarding the TMP and this Code of Conduct;
- Details of speed limit signs;
- Information on fatigue management;
- Reinforcement that they must drive to conditions;
- Details of vehicle inspections including maintenance records and risk assessments; and
- Details of inspections, and audits.

Regular toolbox meetings will be held to maintain awareness of required controls. Details of the traffic and access training and induction will focus on:

- Objectives of the TMP;
- Performance goals, which include:
  - To complete construction with no Injuries,
  - Safety Key Performance Indicators (KPI's) to be completed including inspections, audits, and training.
- Access routes that are outlined within the TMP;
- Mitigation measures required to be implemented;
- Traffic and access monitoring and reporting requirements; and
- Incident investigation and response protocols.

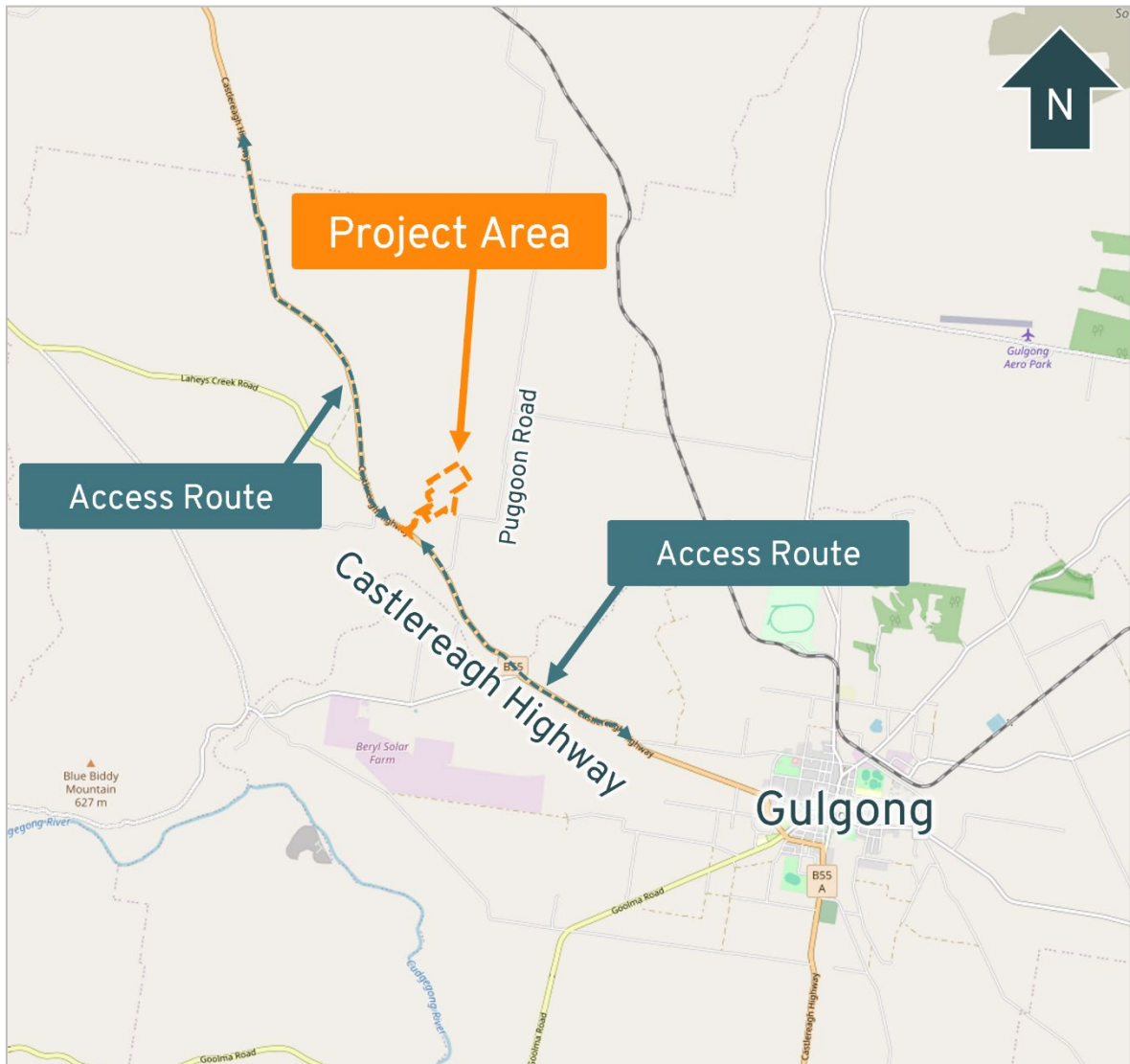
## Primary Driver Code

The following requirements shall be adhered to at all times:

- Obey all laws and regulations.
- Ensure vehicles must arrive/leave the site clean.
- Do not drive whilst under the influence of alcohol, drugs, nor any medication which may affect ability to drive.

- Be medically fit to drive and must inform their supervisor if they have any medical condition which may affect their ability to drive.
- Drive in a considerate manner and respect the rights of others to use and share the road space.
- Always drive to the conditions and adjust speed and following distance accordingly.
- Be alert to changing weather and road conditions (e.g. rain, fog, frost, ice, bright sunlight, flooding, or bushfire).
- Check weather forecasts and road warnings before travelling to site.
- Follow directions provided during daily toolbox talks or by supervisors.
- Do not travel to site if conditions are unsafe or access roads are closed.
- Report all vehicle defects to their employer. Serious defects (e.g. e.g. brakes, steering) must be corrected immediately, or an alternative vehicle supplied.
- Any vehicle incident resulting in injury or significant damage to property must be reported to the police.
- Report any near misses.
- Always adhere to the site working hours.
- Securely fasten and cover load with the appropriate use of ratchets straps, tarpaulins or covers (loose material), chains and load binders, for example. Relevant vehicular load limits are not to be exceeded and all loads are to be suitably balanced. The maximum rear overhang shall not exceed limits under by relevant road rules for respective vehicle types.
- Keep their vehicle clean and in good mechanical condition to reduce the environmental impact.
- Extra care should be taken when driving at dawn or dusk, being particularly watchful for wildlife and/or livestock.
- Vehicles must give way to pedestrians, cranes, forklifts, mobile plant, emergency vehicles and livestock.
- Drivers must adhere to the required access routes outlined within the TMP (Section 3.5 of the TMP), replicated in Figure 11 for reference.

Figure 11: Vehicle Access Route



Source: OpenStreetMap

The following provides further guidance as the required safety procedures for specific incidences:

- Drivers travelling to or from the site must do so safely, in full compliance with the law, including in respect of speed limits, following distances, forward sight when overtaking, being able to stop within the length of road visible (or half the length on roads without centrelines), and not driving carelessly or dangerously;
- When aware of any emergency vehicles, approaching from in front or behind, drivers must pull over well in advance to provide unimpeded movement;
- Drivers must reduce their speed and or stop in accordance with the law when passing a school bus which is slowing down, stopped, or accelerating in relation to picking up or setting down children. Two school bus routes operate past the site and each travel past the site at approximately 8:30-8:40am and 3:45-3:55 pm on school days;
- Drivers must reduce their speed in accordance with the law when:
  - Passing children walking, cycling or waiting on the side of the road;
  - Passing an oncoming school bus;

- Passing someone riding or leading a horse along the road;
- Approaching an area where a stock shift is known to be occurring.
- Truck drivers must not use engine brakes in built up areas, except where the load being carried and the grade of the road make use of such braking absolutely necessary for safe driving;
- Truck drivers are to let traffic behind them pass at regular locations including those opportunities that occur at intersections, wide driveways, sections of road with adequate forward sight distance, gravel pits etc; and
- Rest stops are to be utilised by drivers to reduce driver fatigue as appropriate.

## Chain of Responsibility

Corporate entities, directors, partners, and managers are accountable for the actions of individuals under their supervision, even if not directly involved in driving or operating a heavy vehicle under the Heavy Vehicle National Law (HVNL). This is referred to as the "Chain of Responsibility" (CoR).

All entities on the CoR will be made aware of the Code of Conduct, along with the responsibilities associated with safe loading practices and fatigue management.

## Emergency Procedures

In the event of a breakdown, accident or road failure, the driver shall do the following:

- Park the vehicle in locations where they maximise safety, considering overhanging components, and blind bends on approaches;
- Contact emergency services (including Police) as is appropriate in the case of an accident;
- Contact their supervisor;
- Contact the Council or other road controlling authority as may be appropriate in the case of the incident;
- The supervisor will advise all other project traffic, and local traffic via CB radio as appropriate in the case of the incident; and
- Follow all instructions from Police and the road controlling authority.

In the case of an accident, the vehicles involved should not be moved until instructed by Police.

## Driver Fatigue

### Journey Management Plans

If a person travels more than 100 kilometres because of construction activities in a single trip, then a Journey Management Plan will be required. The person that the Journey Management Plan is for will be required to have breaks every two hours and contact a nominated person and once they have reached their destination contact the nominated person to let them know they have reached their destination.

The Principal Contractors will identify areas where there is a higher risk of workers becoming fatigued (such as long shifts or physically onerous tasks) and implement control measures to mitigate the risk. This includes ensuring sufficient breaks and rotating staff shifts.



## Heavy Vehicle Fatigue Management

In addition to the measure outlines above, there are regulations that apply to heavy vehicles that come from the HVNL which is maintained and improved by the National Transport Commission (NTC) and administered and enforced by the National Heavy Vehicle Regulator (NHVR). The HVNL applies in all states and territories except Western Australia and the Northern Territory and commenced in 2014.

One of the five regulations is the Heavy Vehicle (Fatigue Management) National Regulation, which recognises that fatigue is a key risk and one of the biggest causes of crashes for heavy vehicle drivers.

The fatigue management regulations have four key requirements that apply not just to drivers and all other parties in the Chain of Responsibility (CoR):

- Drivers must not drive a fatigue regulated heavy vehicle on a road while impaired by fatigue. Other parties in the CoR must ensure they prevent a driver from doing this.
- Drivers must work within set limits and have minimum rest requirements. Other parties must not ask or allow drivers to exceed these limits.
- Drivers (or in some cases a driver's record keeper) must make an accurate and complete record of their work and rest time in either a National Driver Work Diary or, if driving within an area with a radius of 100km of the driver's base, alternative work records.
- Drivers must provide their work and rest records to their record keeper within set time frames. A record keeper must retain these records for three years.

Failure to comply with these requirements can result in enforcement action from the NHVR.

A copy of NHVR's Heavy vehicle driver fatigue requirements bulletin is attached in. This document outlines the relevant requirements and includes links to further information related to work diaries, CoR, accreditation, trip plans, and safety management systems. This information is to be used and followed when applicable.

## **Maintenance Requirements**

The operators of all vehicles associated with the site shall maintain a high level of maintenance. The following requirements shall be adhered to at all times:

- Ensure their vehicle complies with relevant State legislation in relation to roadworthiness and modifications;
- Undergo regular vehicle checks and maintenance; and
- Ensure their vehicles have correctly fitted mufflers to minimise noise disturbance.

## **Complaint Resolution**

Drivers must report any complaint received to their supervisor who will then follow the applicable complaints management procedure outlined in Section 8.4 of the TMP.

All complaints will be collated and be responded within two business days.

Failure to comply with the complaint management procedures for safe transport may will result in disciplinary action. Any subsequent breaches identified by the system shall result in disciplinary action.

## Disciplinary Procedure

Any non-compliance with the TMP and Driver Code of Conduct will be investigated and disciplinary action taken.

## Acknowledgment and Agreement

I hereby acknowledge that I have received, read, and fully understand the Driver Code of Conduct. I agree to comply with all the rules, policies, and procedures contained within this Code.

*Driver signature:*

---

(Signature)

*Printed name, organisation and date:*

---

(Printed name, organisation and date)



## Appendix B

### NHVR Heavy Vehicle Driver Fatigue Requirements



# Heavy vehicle driver fatigue requirements

## Compliance and Enforcement bulletin 7

This bulletin provides practical advice to help heavy vehicle drivers and other parties to comply with the requirements of the Heavy Vehicle National Law (HVNL) as they relate to heavy vehicle driver fatigue.

### What are my obligations under the HVNL?

Amendments to the HVNL in 2018 will introduce ‘safety duties’ that must be met by all parties in the Chain of Responsibility (CoR). This requirement means that all parties have a duty to ensure the safety of their transport activities, so far as is reasonably practicable.

Responsible parties in the chain include: employers, prime contractors, operators, schedulers, consignors, consignees, packers, loading managers, loaders, and unloaders.

In addition, the executive officers of each party in the chain must exercise ‘due diligence’ to ensure the safety of their business’s transport activities. The law will require executive officers to:

- keep up-to-date with the safe conduct of transport activities in their business
- fully understand the hazards and risks associated with their transport activities and how these are being managed
- provide appropriate resources—including people, systems and equipment—to manage their safety hazards and risks effectively.

In terms of heavy vehicle driver fatigue, the safety duties provision of the HVNL places a requirement on responsible parties to prevent a driver from driving any heavy vehicle whilst fatigued, not just fatigue-regulated heavy vehicles.

These safety duties extend to identifying any fatigue risks to prevent or reduce potential harm or loss, to yourself and others.

### What are the HVNL fatigue requirements?

Driver fatigue is a leading contributor to heavy vehicle crashes in Australia, with some studies showing fatigue involved in one eighth of Australian heavy vehicle crashes.

To assist drivers and operators of heavy vehicles to avoid driver fatigue, the HVNL sets four key requirements.



### Four key HVNL requirements to avoid driver fatigue

Requirement	Description
1. Don't drive a heavy vehicle while fatigued	Drivers must not drive a fatigue-regulated heavy vehicle on a road while impaired by fatigue. Other parties in the CoR must ensure they prevent a driver from doing this.
2. Work within set limits	Drivers must work within set limits and have minimum rest requirements. Other parties must not ask or allow drivers to exceed these limits.
3. Keep work and rest records	Drivers (or in some cases a driver's record keeper) must make an accurate and complete record of their work and rest time in either a National Driver Work Diary or, if driving within an area with a radius of 100 km of the driver's base, alternative work records.
4. Provide records to record keeper	Drivers must provide their work and rest records to their record keeper within set time frames. A record keeper must retain these records for three years.

### Understanding the HVNL fatigue requirements

#### 1. Don't drive a heavy vehicle while fatigued

Under the HVNL, the safety duty for all heavy vehicle drivers is to not drive a fatigue-related heavy vehicle on a road while impaired by fatigue. A driver is impaired by fatigue when their ability to drive a heavy vehicle safely is affected by fatigue.

The HVNL defines fatigue as including (but not limited to) the following feelings and behaviours:

- feeling sleepy
- feeling physically or mentally tired, weary or drowsy
- feeling exhausted or lacking energy
- behaving in a way consistent with the above.

If a heavy vehicle driver is driving and experiences any of these symptoms, they must stop work immediately (as soon as it is safe to do so). The driver must not work again until they are no longer affected by fatigue.

**Tip: Getting plenty of good quality rest and/or sleep are the most effective ways to prevent and recover from fatigue.**

A driver can be impaired by fatigue at any time, even when they comply with work and rest hour limits. Regardless of how many hours they may have worked or rested, they must never drive if they are impaired by fatigue.

## 2. Work within set limits

The scientific evidence shows that fatigue increases the longer a person is awake and or the less sleep they have. To assist heavy vehicle drivers get enough time to sleep and to not work too long, the HVNL requires all heavy vehicle drivers to comply with set work and rest limits.

### What is work and rest?

While driving is the most common type of work, it is important to note that any other task relating to the operation of a fatigue-regulated heavy vehicle is regarded as work, including for example:

- instructing/supervising another person driving a fatigue-regulated heavy vehicle
- loading or unloading a fatigue-regulated heavy vehicle
- inspecting, repairing or servicing a fatigue-regulated heavy vehicle
- inspecting or attending to a load (adjusting/securing load) of a fatigue-regulated heavy vehicle (a load includes passengers)
- cleaning and refuelling a fatigue-regulated heavy vehicle
- completing paperwork in relation to a fatigue-regulated heavy vehicle (organising loads/work)
- recording information or completing a document that is required under the HVNL
- helping another person or supervising any of the above
- occupying the driver seat of a fatigue-regulated heavy vehicle while its engine is running

**Note:** Exemptions may apply.

These tasks have been limited because they extend the time a person is awake, increasing the risk of being fatigued.

Rest in relation to the operation of a fatigue-regulated heavy vehicle is not doing any of the above.

### What work and rest options are available?

The HVNL provides heavy vehicle drivers and operators with various work and rest hours options, each with their own work and rest limits. There are four options available:

#### 1. Standard hours

2. Basic Fatigue Management (BFM) hours
3. Advanced Fatigue Management (AFM) hours
4. Exemption hours.

**Note:** The following link to the NHVR website provides the work and rest requirements for each of the work and rest hours options.

[www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/work-and-rest-requirements](http://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/work-and-rest-requirements)

BFM and AFM provide increased levels of flexibility by managing fatigue risks through the National Heavy Vehicle Accreditation Scheme (NHVAS). Heavy vehicle drivers can only work under these hours if they have been inducted into an accredited operators system.

Exemptions enable operators and drivers to apply for work and rest hours not possible under any of the other work and rest options. Strict constraints apply.

## 3. Keep work and rest records

### When does a driver need to carry a Work Diary?

A driver of a fatigue-regulated heavy vehicle is required to carry a Work Diary when they are, or if they have in the last 28 days, been:

- driving outside a radius of 100km from their driver base (100+km work)
- working under BFM or AFM
- working under an exemption.

At the request of an Authorised Officer, drivers must produce their Work Diary records for the previous 28 days. An Authorised Officer is a police officer, state or territory road agency officer or an NHVR officer.

**Note:** Some specific state and territory exemptions exist.

### Completing a Work Diary (100+km work)

Drivers of a fatigue-regulated vehicle undertaking or planning to undertake a 100+km journey in a day must complete their Work Diary (including all work and rest) for that day. Detailed instructions on how to complete your Work Diary, including examples, are located at the beginning of your Work Diary.

### Counting time

There are detailed instructions on pages 21-25 of the Work Diary explaining how to count time. It is important to remember when counting time that:

- each 24-hour period starts at the end of a major rest break relevant to the work/rest hours arrangement under which the driver is working (e.g. standard hours solo (at least) seven hours continuous rest).
- each 24-hour period ends exactly 24 hours after commencement.
- it is possible that you could have more than one 24-hour period running at the same time. This can occur when there are two major rest breaks within a 24-hour period.

**Tip: A major rest break does not reset your 24-hour period; it commences another 24-hour period.**

## Recording work/rest in non-participating jurisdictions

If you are the driver of a fatigue-regulated heavy vehicle travelling into WA or NT for a period of seven days or less, you are required to comply with both the HVNL fatigue requirements and any relevant local laws. To demonstrate your compliance, you should complete your Work Diary as you would if you were working in a participating jurisdiction.

For periods of work longer than seven days carried out in a non-participating jurisdiction, the driver will need to comply with the local heavy vehicle driver fatigue, work rest and record keeping requirements. When driving a fatigue-regulated heavy vehicle and returning from a non-participating jurisdiction to a participating jurisdiction, the driver must complete their Work Diary from the beginning of the last major rest break taken prior to re-entering the participating jurisdiction.

Further information can be found on page 9 of the Work Diary instructions.

## 4. Provide records to record keeper within set time frames

Record keepers must keep a record of specific information for drivers of fatigue regulated heavy vehicles. A record keeper may be the:

- employer, if the driver is employed
- accredited operator, if the driver is working under BFM or AFM accreditation
- driver (as a self-employed or owner driver).

Drivers must provide their record keeper with their relevant work and rest hours totals and any other relevant vehicle information the record keeper may not reasonably have access to (registration numbers, dates the driver worked, etc.).

The record keeper determines the record location and notifies the driver. The record location is usually the driver's base.

All records must be:

- kept for three years after they are created
- kept at a location accessible to an Authorised Officer for audit or investigation purposes
- in a format that is readable and reasonably assumed it will be readable in at least three years from the date of its creation.

## When do HVNL fatigue requirements apply?

The heavy vehicle driver fatigue requirements found in chapter 6 of the HVNL apply to drivers and other parties operating a fatigue-regulated heavy vehicle.

A fatigue-regulated heavy vehicle is defined as a:

- motor vehicle with a Gross Vehicle Mass (GVM) of more than 12t
- combination with a GVM of more than 12t
- fatigue-regulated bus (GVM greater than 4.5t and built or fitted to carry more than 12 adults including the driver).

Some vehicles have been specifically excluded from this definition, these include motor vehicles that are:

- built to operate primarily as a machine or implement off-road and are not capable of carrying goods or passengers by road
- or
- motorhomes.

For example, a truck with a GVM of 8.7t towing a trailer with a GVM of 3.4t (8.7t + 3.4t = 12.1t) would be classed as a fatigue-regulated heavy vehicle.

**Tip:** The manufacturer specifies the GVM and it can be located on the vehicle identification plate, registration label or papers.

## What can I do to manage fatigue?

The implementation of a safety management system (SMS) that addresses the risks associated with fatigue will assist in satisfying the requirements of the HVNL as they relate to heavy vehicle driver fatigue.

While this bulletin is not intended to provide an exhaustive list, here are some examples of systems that can be established as part of an effective SMS:

- Reviewing driving or work schedules and work records of relevant drivers
- Regularly assessing fitness for duty of relevant drivers
- Reviewing contractual arrangements and documentation relating to the consignment and delivery of goods
- Reviewing loading and unloading times and delays at loading and unloading places
- Developing and adhering to trip plans
- Implementing formalised processes to engage and consult with other parties in the chain.

## What actions can Authorised Officer's take?

Authorised Officers have powers relating to heavy vehicle driver fatigue requirements, including inspecting heavy vehicle driver's work and rest records.

Enforcement action for any breach of fatigue, work/rest hours or Work Diary requirements will depend on the nature and severity of the breach. Options available to Authorised Officers include (but are not limited to) formal warnings, infringement notices and court imposed penalties.

Drivers of fatigue-regulated heavy vehicles that are deemed to be driving while impaired by fatigue may face penalties and be prevented from working, even if they are complying with work and rest requirements.

Drivers of fatigue-regulated heavy vehicles may be directed to immediately stop work and not work again for a stated period if:

- the driver is impaired by fatigue
- the driver has committed a severe or critical work/rest hours breach
- the driver is unable to produce a Work Diary without a reasonable excuse
- the Work Diary produced cannot be relied on as an accurate record of the time the driver recently spent working or resting.

## Where can I get more information?

### Heavy vehicle driver fatigue or Work Diary requirements

This bulletin summarises the key obligations set out in the HVNL and is not exhaustive. Visit our website for more information about heavy vehicle driver fatigue or Work Diary requirements or contact us on 1300 MYNHVR (1300 696 487). [www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management](http://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management)

### Chain of Responsibility (CoR)

More information is available on the NHVR website at: [www.nhvr.gov.au/safety-accreditation-compliance/chain-of-responsibility](http://www.nhvr.gov.au/safety-accreditation-compliance/chain-of-responsibility)

### NHVAS

More information is available on the NHVR website at: [www.nhvr.gov.au/safety-accreditation-compliance/national-heavy-vehicle-accreditation-scheme](http://www.nhvr.gov.au/safety-accreditation-compliance/national-heavy-vehicle-accreditation-scheme)

### Fatigue management exemptions

More information is available on the NHVR website at: [www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/fatigue-management-exemptions](http://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/fatigue-management-exemptions)

### Safety Management Systems (SMS)

More information is available on the NHVR website at: [www.nhvr.gov.au/safety-accreditation-compliance/safety-management-systems](http://www.nhvr.gov.au/safety-accreditation-compliance/safety-management-systems)

#### For more information

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Telephone: 1300 MYNHVR (1300 696 487)\*

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Disclaimer: This information is only a guide and should not be relied upon as legal advice.  
\*Standard 1300 call charges apply. Please check with your phone provider.  
Image source: Volvo Trucks Australia

## Appendix C

### Road Authority Consultation





AA | LAN900140

3 October 2025

Andrew Brownlow  
Vena Energy  
Email: andrew.brownlow@venaenergy.com

Dear Andrew

**SUBJECT: BELLAMBI HEIGHTS BESS – STAGE 2 TRAFFIC MANAGEMENT PLAN**

Thank you for providing the stage 2 Traffic Management Plan for Council's consideration. The document has been assessed against the Development Consent conditions and relevant transport and safety requirements.

A number of matters require further clarification. Council requests these be addressed as a standalone addendum prior to the commencement of stage 2 works.

**1. Shuttle Bus Arrangements**

Shuttle bus details are to be finalised prior to commencement of Stage 2 works, including:

- confirmed routes,
- designated pick-up/drop-off locations,
- parking facilities for workers' vehicles, and
- timetables coordinated with construction shifts.

This information is to be provided to Council and TfNSW before construction begins.

**2. Signage and Traffic Guidance Schemes**

Where temporary external traffic control is required, site-specific Traffic Guidance Schemes (TGS) will be prepared by a TfNSW-accredited designer.

- Diagrams showing sign placement, spacing, and sequencing will be appended to the TMP.
- All devices will comply with AS 1742.3:2019 and TfNSW *Traffic Control at Work Sites* guidelines.

**3. School Bus Coordination**

Formal protocols with Ogden Coaches will be documented prior to works, including:

- confirmation of bus routes and times,
- provision of 48-hour advance notice for major deliveries, and
- traffic control at the site access during school bus operating windows if heavy vehicles are scheduled.

**4. Emergency Access and Council Notification**

- The TMP will include an Emergency Access Strategy covering detour arrangements in the event of Castlereagh Highway closure.
- Council will be notified of any road-related incidents or emergency traffic management measures

### 5. Cumulative Impacts

Liaison with nearby State significant projects (including Tallawang Solar Farm and ACEREZ) should be undertaken on a monthly basis during construction.

- Records of consultation will be kept and shared with Council and TfNSW upon request.
- Construction traffic scheduling will avoid coinciding peak periods where feasible.

### Council Assessment Matrix – Stage 2 Traffic Management Plan

Condition / Issue	TMP Reference	Council Assessment	Recommendation
B1 – Heavy Vehicle Caps (40/day; 20 LV + 4 HV in peaks)	Sec. 3.4, Table 5	TMP sets limits and requires daily logs. Needs clear evidence of <i>auditable system</i> .	Require confirmation of data recording system (e.g., GPS logs, weighbridge, gate log).
B3 – Heavy Vehicle Routes (Golden Hwy / Castlereagh Hwy only)	Sec. 3.5, Fig. 8	Routes clearly defined. No allowance for local roads.	Acceptable – but Council to request <i>commitment that no local roads will be used</i> .
B8 – Site Operations (parking, drainage, vehicle cleanliness)	Sec. 5.5, 5.7	On-site parking and mud control addressed. No wheel wash detail.	Require specification of <i>vehicle wheel wash or equivalent</i> before public road access.
Signage & Wayfinding	Sec. 6.2–6.3	Only framework provided, no diagrams of signage/TGS.	Require detailed Traffic Guidance Schemes prior to works.
School Bus Coordination	Sec. 5.4	Mentions Ogden Coaches, but no written protocols.	Require confirmation of consultation records & bus conflict management (traffic controller protocol).
Shuttle Bus Arrangements	Sec. 3.4.1, 5.6.2	“To be confirmed” at time of writing.	Must be confirmed with Council before construction.
Cumulative Impacts (Tallawang Solar, ACEREZ)	Sec. 5.2	Acknowledged but relies on future liaison.	Require monthly records of consultation and scheduling coordination.
Emergency Access / Detour	Sec. 5.8, 5.9, 8.3	Covers incident reporting to DPIE, but no detour plan or Council notification.	Require TMP addendum to include emergency detour strategy and Council notification pathway.
Monitoring & Auditing	Sec. 8.1, 9.1	Monthly audits by Vena/PCs, but unclear how results are shared.	Require audits to be provided to Council/TfNSW
Community Events	Table 4	Notes Gulgong Show, Folk Festival, etc.	Acceptable, but Council requires event calendar check-ins as part of delivery scheduling.

Please provide the requested clarifications and addendum at your earliest convenience to allow progression of the project schedule.

Should you wish to discuss any of the above in detail, I am happy to arrange a meeting.

JULIAN GEDDES  
DIRECTOR OPERATIONS

11 November 2025

TfNSW reference: REN25/00177/001

Your reference: SSD - 33344237

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

Rachel Purcell

By Email: [rachel.purcell@dpie.nsw.gov.au](mailto:rachel.purcell@dpie.nsw.gov.au)

cc: [andrew.brownlow@venaenergy.com](mailto:andrew.brownlow@venaenergy.com)

**Review of Stage 2 Traffic Management Plan for Bellambi Heights Battery Energy Storage System- 696 Castlereagh Highway, Beryl, Revision A, prepared by Amber dated September 2025**

Reference is made to the Traffic Management Plan (TMP) submitted to Transport for NSW (TfNSW) for consideration in accordance with consent Condition B9 of Notice of Determination for SSD - 33344237 issued 2 May 2024. TfNSW notes that the Stage 2 Traffic Management Plan for Bellambi Heights BESS is for the construction of the development, excluding the high-risk heavy vehicles requiring escort deliveries, which will be subject to a further revision of the TMP as part of Stage 3 of the project.

TfNSW has reviewed the TMP prepared by the Amber Organisation, dated September 2025, and is not satisfied that the document adequately addresses the Condition B9-Traffic Management Plan requirements. Additional information is requested in Attachment A

The revised TMP is to be resubmitted to TfNSW for further consultation in accordance with the consultation requirements of Condition B9 Traffic Management Plan and other relevant transport conditions, within the Bellambi Heights BESS approval.

TfNSW will not endorse the TMP until the concerns raised within Attachment A have been addressed.

If you have any questions, please contact Alexandra Long, Development Services Case Officer, on 1300 019 680 or email [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au)

Yours sincerely,



**Nathan Boscaro**

Acting Manager of Development Services – West  
Transport Planning  
Planning, Integration and Passenger

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**SSD-33344237 Review of Stage 2 Traffic Management Plan for Bellambi Heights Battery Energy Storage System- 696 Castlereagh Highway, Beryl, Revision A.**

This attachment relates to TfNSW's response dated 17 October 2025 reference REN 25/00177/001.

**Context:**

The Bellambi Heights TMP is subject to a staged approval. TfNSW has reviewed the previous Stage 1 for the road upgrades. The current review is for Stage 2. The Stage 2 scope of works is for the BESS compound and the substation switching yard construction. No high-risk OSOM movements are proposed as part of Stage 2

**TfNSW outstanding matters to be resolved in the revised TMP**

1. *The TMP should include details of the enforcement and monitoring measures that will be implemented to record and track the 40 daily heavy vehicle volumes*
2. *The TMP should include details of the enforcement and monitoring measures that will be implemented to record and track the 20 light vehicle volumes and 4 heavy vehicle movements during the AM (6-7 am) or PM (5-6 pm) project peak hours during construction, upgrading, or decommissioning*
3. *The TMP should include commitments made within EIS and RTS stages of the assessment which include the following*
  - a. Detail the impacts with the proposed increase from 100 to 134 workforce personal
  - b. Original commitment was for 20 Light vehicles and up to 80 workers at peak construction were to be transported to the site in a typical 12.5m bus which carries approximately 50 seated passengers.
  - c. *Detail enforcement and monitoring measures as mentioned in points 1 and 2*
4. The TMP should include a reference "heavy vehicle lengths are not to exceed 26m" to support conditions of consent B1 (b).
5. The TMP should include a map reference that identifies the heavy vehicle routes to support condition B3.
6. The TMP should include reference that states no onsite construction works are to commence prior to the completion of the intersection upgrade unless supported by a Planning Secretary request and subsequent updated TMP.
7. The TMP should include reference that TGS/ROL Approval is required prior to works commencing and Traffic Guidance Schemes (TGS) to be prepared by a TfNSW-accredited designer and to comprise:
  - a. A plan package showing sign placement, spacing, and sequencing will be appended to the TMP.
  - b. All devices to comply with AS 1742.3:2019 and TfNSW Traffic Control at Work Sites guidelines.
8. The TMP should TfNSW in reference that requires photo evidence for the completed works to close the existing access

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9. The Department of Planning, Housing and Infrastructure would be satisfied with the following:
  - a. sufficient information has been provided within section 5.3-Information and Communications to address B9 d(ii)
  - b. sufficient information has been provided to address condition B9 d(iii)
10. The TMP should include supporting consultation with Tallawang Solar Farm in relation to condition B9 d(iii).
11. Insufficient information has been provided to adequately address condition B9 d(v) which is to minimise potential for conflict with school buses and other road users. A list of applicable logistics and traffic management protocols to avoid and minimise impacts to bus routes should be provided with a commitment to avoid those times. Supported by Councils comments on TMP.
12. The TMP should include an additional reference in the first paragraph of section 5.7 to clearly state it's the construction contractor or another parties responsibility for this task.
13. Further detail is required to address the employee shuttle bus service adequately. Specifically, the following elements must be finalised prior to the commencement of Stage 2 works:
  - a. Confirmed shuttle bus routes.
  - b. Designated pick-up and drop-off locations.
  - c. Parking facilities for construction workers private vehicles.
  - d. Timetables aligned with construction shift schedules.

It is also noted that Council has also requested further detail regarding Section 5.6 Car-Pooling & Shuttle Buses.
14. Further detail is required to adequately address the proposed measures for encouraging car-pooling or ride sharing among employees. The current documentation lacks sufficient information regarding:
  - a. How the initiative is intended to be implemented.
  - b. Specific measures and incentives to promote participation.
  - c. Operational protocols and logistical arrangements.
15. The TMP does not provide formal protocols provided outlining how emergency repairs or maintenance requirements will be identified, assessed, and actioned. This should be expanded and include
  - a. reporting, escalation, or coordination with road authorities.
  - b. Monitoring mechanisms to ensure consistent observation and timely response
16. Section 5.2 Delivery Logistics, lacks sufficient detail to address the requirement for scheduling heavy vehicle movements in a manner that minimises convoy length, avoids platooning, and reduces conflict with light vehicles. Further information is required, including:
  - a. Defined protocols for managing and staggering heavy vehicle movements.
  - b. Measures to prevent convoy formation and ensure safe integration with light vehicle traffic.
  - c. Monitoring mechanisms to verify compliance with daily movement limits and scheduling requirements.
  - d. Identification of the responsible party or authority overseeing implementation and enforcement.
  - e. Evidence or documentation supporting the proposed approach, including traffic management plans, scheduling tools, and coordination procedures.

**TfNSW outstanding matters to be resolved in the Drivers Code of Conduct**

17. Provide evidence that the procedures for managing adverse weather conditions have been formally incorporated into the Driver's Code of Conduct
18. To ensure that drivers adhere to the designated transport routes and speed limits; TfNSW recommend strengthen compliance measures to be consideration for example:
  - a. GPS tracking or route verification tools.
  - b. Speed monitoring systems or spot checks.
  - c. Clear escalation procedures for non-compliance.
  - d. Evidence of audit schedules and enforcement logs.
19. The Department of Planning, Housing and Infrastructure would be satisfied with the following matters within the drivers code of conduct.
  - a. Adequate information has been provided to address Driver Fatigue
  - b. Adequate work has been completed to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan. In particular
    - i. Structured Training Program:
    - ii. Assessment and Certification:
    - iii. Refresher Training:
    - iv. Record-Keeping:

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## Appendix D

### Extract of Approved Road Upgrade



# CASTLEREAGH HIGHWAY INTERSECTION UPGRADE

## BERYL NEW SOUTH WALES

### DETAILED CIVIL DESIGN FOR WORKS AUTHORISATION DEED (WAD)

### TfNSW WAD REFERENCE WST24/00004

PLAN NUMBER	DRAWING TITLE
MKR0099-201-C0000	COVER SHEET AND INDEX
MKR0099-201-C0010	NOTES
MKR0099-201-C0040	KEY PLAN
MKR0099-201-C0050	EXISTING CONDITIONS PLAN
MKR0099-201-C0100	CIVIL WORKS LAYOUT PLAN
MKR0099-201-C0310	TYPICAL SECTIONS PLAN
MKR0099-201-C0350	CIVIL DETAILS
MKR0099-201-C0400	PAVEMENT PLAN
MKR0099-201-C0550	LONGITUDINAL SECTIONS - ROAD 01 & 02
MKR0099-201-C0600	ROAD CROSS SECTIONS PLAN - ROAD 01 - 1 OF 6
MKR0099-201-C0601	ROAD CROSS SECTIONS PLAN - ROAD 01 - 2 OF 6
MKR0099-201-C0602	ROAD CROSS SECTIONS PLAN - ROAD 01 - 3 OF 6
MKR0099-201-C0603	ROAD CROSS SECTIONS PLAN - ROAD 01 - 4 OF 6
MKR0099-201-C0604	ROAD CROSS SECTIONS PLAN - ROAD 01 - 5 OF 6
MKR0099-201-C0605	ROAD CROSS SECTIONS PLAN - ROAD 02 - 6 OF 6
MKR0099-201-C0700	KERB RETURN LAYOUT AND SECTIONS
MKR0099-201-C0800	STORMWATER LAYOUT PLAN
MKR0099-201-C0801	STORMWATER CROSSING - LAYOUT PLAN AND DETAILS - 1 OF 2
MKR0099-201-C0802	STORMWATER CROSSING - LAYOUT PLAN AND DETAILS - 2 OF 2
MKR0099-201-C0803	SUB SOIL DRAINAGE LONGITUDINAL SECTION - AND DETAILS

PLAN NUMBER	DRAWING TITLE
MKR0099-201-S0001	PRECAST CULVERT SLAB DETAILS - GENERAL & CONSTRUCTION NOTES
MKR0099-201-S0101	PRECAST CULVERT SLAB DETAILS - CULVERT PLAN & DETAILS - 1 OF 2
MKR0099-201-S0201	PRECAST CULVERT SLAB DETAILS - CULVERT PLAN & DETAILS - 2 OF 2
MKR0099-201-C0900	STORMWATER CATCHMENT PLAN
MKR0099-201-C1700	SWEPT PATH ANALYSIS LAYOUT PLAN - DESIGN VEHICLE
MKR0099-201-C1701	SWEPT PATH ANALYSIS LAYOUT PLAN - CHECK VEHICLE
MKR0099-201-C1800	SIGHT LINE LAYOUT PLAN
MKR0099-201-C1801	SIGHT LINE LONGITUDINAL SECTIONS
MKR0099-201-C1900	SIGNS AND LINEMARKING LAYOUT PLAN

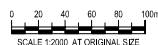


LOCALITY DIAGRAM

**Transport for NSW**  
 NSW GOVERNMENT  
 Accepted for Construction  
 Digitally signed by Steven Christian  
 Date: 2025.08.12 09:32:08 +10:00  
 Date: 12AUG25  
 Subject to conditions in TfNSW's Letter of Detail Design Acceptance

TfNSW ROAD LOC CHAINAGE 7.661 =  
 INTERSECTION IP CHAINAGE 112.113

REV	DATE	DESCRIPTION	AND BY	APP BY
6	31.07.25	ISSUED FOR APPROVAL	ADG	JMA
5	25.07.25	ISSUED FOR APPROVAL	JMN	JMA
4	01.07.25	ISSUED FOR APPROVAL	JMN	JMA
3	06.05.25	ISSUED FOR APPROVAL	JMN	JMA
2	04.03.25	ISSUED FOR APPROVAL	JMN	JMA
1	10.12.24	ISSUED FOR APPROVAL	JMN	JMA



DRAWN: J.NEWELL	DESIGNED: J.NEWELL	CASTLEREAGH HIGHWAY INTERSECTION UPGRADE DETAILED DESIGN - DS2024/001300 COVER SHEET AND INDEX		
DRAFT CHECK: J.AGUSTIN	DESIGN CHECK: J.AGUSTIN			
APPROVED: J.AGUSTIN	FOR APPROVAL			
DRAWING NUMBER MKR0099-201-C0000		SHEET No.	ORIG. SIZE A1	REVISION 6

## Appendix E

### Approved Project Layout (Mod-1)



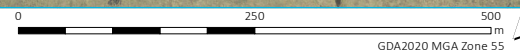
\\emm.local\drive\2025\E250441 - Bellambi BESS Mod 1\GIS\02 Maps\Letter\001 ModifiedDevelopmentFootprint 20250612 02.mxd 18/06/2025



- KEY
- Approved development footprint
  - Modified development footprint (preliminary)
  - Existing environment
  - Major road
  - Minor road

Modified development footprint

Source: EMM (2025); VenaEnergy (2025); DFSI (2020, 2021)



Bellambi Heights  
Battery Energy Storage System  
Figure 2.1



## Appendix F

### Vena Letter Restricted Construction Activities



12 December 2025

Department of Housing, Planning and Infrastructure  
 Energy, Resources and Industry  
 Wayne Jones, Team Lead Post Approvals

**SSD 33344237: BELLAMBI HEIGHTS BESS - PLANNING SECRETARY REQUEST CONDITION B7**

Poor sub-grade first encountered late November, exacerbated by unfavourable weather, continues to compromise the BAL/BAR road upgrade completion date. TfNSW, via the Works Authorisation Deed, is being notified of an anticipated completion date 12 January 2026. Possession of site for the Principal Contractors (Samsung and Transgrid) has been delayed until 5<sup>th</sup> and 12th January 2026 respectively.

For the potential circumstance whereby road works are not complete by 12 January, Vena Energy request the Planning Secretary's agreement to allow restricted construction activities to commence from this date. This is required to maintain the project's May 2027 Commercial Operations Date. Construction activities would be restricted to site mobilisation, including fencing, establishing a temporary construction laydown, installing sediment and erosion controls, general site shed setup and install of amenities and starting bulk earthworks.

RESTRICTED CONSTRUCTION		
	TRANSGRID	SAMSUNG
Possession of Site	Monday, 12 January 2026	Monday, 5 January 2026
Workforce	8	17
Plant mobilisation to site	Portaloo, excavator, grader, moxy, roller ,smooth drum, water cart	Dozer, 2 x excavators, compactor, water cart, hydraulic crane, forklift
Equipment/materials to site	Fencing, 10 sheds and temp laydown capping material	Fencing, 22 office sheds, 4 x offices 5 toilets, 4 x 5kL water tanks, 6kL septic tank; 3 x diesel generators, battery bank and miscellaneous pipe, cabling and pumps.
Total heavy vehicle movements	35	45
Max daily heavy vehicle movements		10
Peak hour heavy vehicle movements		2
OSOM requiring pilot/escort	None	None
Heavy vehicle movements for bulk earthworks	No importation of aggregate or removal of cut. Water tanker as required	No importation of aggregate or removal of cut. Water tanker as required

Safe site access and egress for these activities, whilst the road works are being completed, is afforded via the Road Occupancy License and approved Traffic Guidance Scheme, and to be managed in consultation with Principal Contractor completing the BAL/BAR works via the WAD. No heavy vehicles requiring pilot/escort would occur, and bulk earthworks would not include either the import of any aggregates or removal of material from the site. Water tankers for dust suppression would be the only recurring heavy vehicle movement post mobilisation.

All works will be within the approved development footprint and undertaken in compliance with the approved Environmental Management Strategy, Biodiversity Management Plan, Chance Finds Protocol and Stage 2 Traffic Management Plan.

If additional information is required to facilitate timely consideration of this request please do not hesitate to ask.

Yours sincerely,

*Andrew Brownlow*

Andrew Brownlow  
Manager, Development & Stakeholders

## Appendix G

### Road Authority Consultation – Restricted Stage 2 Construction Activities





- Construction staging and access management details, including coordination arrangements with the Principal Contractor delivering the BAL/BAR upgrade.
- ROL amendments, if required, reflecting the actual conditions that will apply during the restricted works period.

*It is also noted that TfNSW's previous correspondence dated 11 November 2025 (Review of Stage 2 Traffic Management Plan for Bellambi Heights Battery Energy Storage System- 696 Castlereagh Highway, Beryl, Revision A, prepared by Amber dated September 2025) has not been acknowledged nor addressed.*

Regards,

**Alexandra Long**

Development Services Case Officer- Renewables  
Transport Planning  
Planning, Integration and Passenger  
**Transport for NSW**

P 1300 019 680 E [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au)

[transport.nsw.gov.au](http://transport.nsw.gov.au)

**Working days** Monday-Friday 9.30-5.30pm



**Transport  
for NSW**

*Please be aware that the Transport for NSW office's will be closed for the Christmas and New Year holiday period. Our last business day will be Wednesday the 24th of December 2025, and we will return on Monday the 12th of January 2026. Development Services Renewables will prioritise responding to projects within the Major Projects Portal until 24th of December 2025. Any requests or responses outside the Major Projects Portal will be reviewed and allocated to a team member to respond to your enquiry or request within 21 days. Note that design reviews for strategic designs require 14 days for internal review, and meetings will be prioritised for projects within the assessment phase or nearing determination.*

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## Andrew Brownlow

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**From:** Julian Geddes <Julian.Geddes@midwestern.nsw.gov.au>  
**Sent:** Monday, 1 December 2025 4:54 PM  
**To:** Andrew Brownlow; Alina Azar  
**Subject:** RE: Bellambi Heights BESS - TMP

Hi Andrew,

Subject to TfNSW concurrence, Council would be open to this interim measure strictly in accordance with the details nominated in the restricted construction schedule.

Can you please provide a copy of the ROL and TGS for Councils information.

Regards.

Julian Geddes  
Director, Operations  
Mid-Western Regional Council

t 02 6378 2815

m 0499 514 188

f 02 6378 2813 | e [julian.geddes@midwestern.nsw.gov.au](mailto:julian.geddes@midwestern.nsw.gov.au)

a 54 Depot Road | PO Box 156 Mudgee NSW 2850

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**From:** Andrew Brownlow <[andrew.brownlow@venaenergy.com](mailto:andrew.brownlow@venaenergy.com)>  
**Sent:** Monday, 1 December 2025 2:02 PM  
**To:** Alina Azar <[Alina.Azar@midwestern.nsw.gov.au](mailto:Alina.Azar@midwestern.nsw.gov.au)>  
**Cc:** Julian Geddes <[Julian.Geddes@midwestern.nsw.gov.au](mailto:Julian.Geddes@midwestern.nsw.gov.au)>  
**Subject:** Bellambi Heights BESS - TMP

Good afternoon Alina/Julian

Vena is seeking to have a contingency plan in place to enable restricted construction activity to commence prior to completion of the access treatment of the Castlereagh into the Bellambi Heights site.

The reason for, scale and scope of this restricted construction activity is detailed in the attached. Before consideration, DPHI has asked that Vena consult with MWRC to see whether this interim measure is acceptable from Council's perspective.

Your advice would be very much appreciated.

With thanks

Andrew

---

**From:** Alina Azar <[Alina.Azar@midwestern.nsw.gov.au](mailto:Alina.Azar@midwestern.nsw.gov.au)>  
**Sent:** Friday, 3 October 2025 12:44 PM  
**To:** Andrew Brownlow <[andrew.brownlow@venaenergy.com](mailto:andrew.brownlow@venaenergy.com)>  
**Cc:** Julian Geddes <[Julian.Geddes@midwestern.nsw.gov.au](mailto:Julian.Geddes@midwestern.nsw.gov.au)>  
**Subject:** [Ext] Bellambi Heights - TMP Response

Hi Andrew

Apologises for the delay in this. Please see attached the response from Council regarding the TMP.

Julian is happy to discuss further where necessary.

Thanks

Alina

Alina Azar  
Director Development  
Mid-Western Regional Council

t 02 6378 2885

e [alina.azar@midwestern.nsw.gov.au](mailto:alina.azar@midwestern.nsw.gov.au)

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23 December 2025

TfNSW reference: REN 25/00177/004

Your reference: SSD - 33344237

Department of Planning, Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Rachel Purcell

By Email: rachel.purcell@dpie.nsw.gov.au

cc: wayne.jones@planning.nsw.gov.au;  
andrew.brownlow@venaenergy.com

**SSD - 33344237- Bellambi Heights Battery Energy Storage System- 696 Castlereagh Highway, Beryl,- REQUEST FOR SECRETARY' SDISCRETION - CONDITION B7**

Transport for NSW (TfNSW) is responding to the SSD - 33344237- Bellambi Heights Battery Energy Storage System, the proponents Secretary's Request referred on 17 December 2025 to vary Condition B7 to permit restricted construction activities prior to completion of road upgrade works and the following supporting information:

Documentation submitted

- *SSD 33344237: BELLAMBI HEIGHTS BESS - PLANNING SECRETARY REQUEST CONDITION B7 - prepared by Vena Energy dated 12 December 2025.*
- *Bellambi Heights Battery Energy Storage System 696 Castlereagh Highway, Beryl Stage 2 Traffic Management Plan Revision D dated 12 December 2025, prepared by Amber.*
- *TRAFFIC MANAGEMENT PLAN (TMP)REVISION: 2 PROJECT: Bellambi Heights Battery Energy Storage System CONTRACT NO. WST24/00004 - Revision 02 endorsed by A1 Earthworx.*
- TGS
- *ROAD OCCUPANCY LICENCE NO : 2594210*

The Secretary's request letter to vary Condition B7, prepared by Vena Energy and dated 12 December 2025, notes that, in the event road works are not completed by 12 January 2025, approval is sought to permit restricted construction activities before the commencement of road upgrade works to commence from 12 January 2026. These activities would be limited to site mobilisation works, including the installation of fencing, the establishment of a temporary construction laydown area, the implementation of sediment and erosion controls, the setup of site sheds and amenities, and the commencement of bulk earthworks.

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TfNSW supports the Planning Secretary's Request to permit restricted construction activities before completion of road upgrade works, subject to the following conditions:

- 1) The approval of the Secretary's request is to stipulate that restricted construction activities are to be limited to site mobilisation works, including the installation of fencing, establishment of a temporary construction laydown area, implementation of sediment and erosion controls, setup of site sheds and amenities, and commencement of bulk earthworks.
- 2) The approval of the Secretary's request is to be conditioned to commence from 12 January 2026 with further information on the timing of the project schedule to be provided and updated within the TMP. TfNSW to be informed of the revised timing and reasoning for the delay to the completion of the road upgrades. The interim arrangement for the use of the access point while the road upgrades are being constructed will be limited to three months, commencing on 12 January 2026 (or the date of approval by DPHI).
- 3) TfNSW is to be notified at the commencement and completion of the discrete construction works site mobilisation works, including the installation of fencing, establishment of a temporary construction laydown area, implementation of sediment and erosion controls, setup of site sheds and amenities, and commencement of bulk earthworks.
- 4) The use of the access point while the road upgrades are being constructed concurrently will be limited to the hours of operation in which the traffic controllers and/or traffic control devices are implemented to manage the traffic through and around the work site, unless:
  - a) A swept path analysis of the design vehicle showing a tangential movement at the Castlereagh Highway and the access point (in the current state) is provided to TfNSW. The swept path analysis must demonstrate that the design heavy vehicle can complete the swept path tangentially within the correct lane, without crossing over centrelines and can complete this movement within the existing pavement. This swept path analysis must be provided for all proposed travel directions.
  - b) That the Safe Intersection Sight Distance is assessed and provided for the interim (under construction) state of the access point with the Castlereagh Highway in all turn directions based on the temporary design speed and the existing design speed (if the use of the access point is to occur when the temporary speed zone signage is covered).
- 5) The approval of the Secretary's request is to condition the revision of the existing approved TGS plan for the proposed *Interim Restricted Construction Activities* to be finalised and approved accordingly.
- 6) The approval of the Secretary's request is to condition that vehicle movements will remain under consented vehicle movement limits, with no heavy vehicles requiring escort to be used during the restricted construction activities.
- 7) The AM/PM network peak hour is to be limited to a traffic volume that is commiserate with the existing land use of the site, before approval of the Bellambi BESS. For example, generally, rural dwellings generate seven light vehicle trips and one heavy vehicle trip within the network peak hour (at a maximum). Construction traffic can occur at the consented volumes, outside of the network peak hour, subject to:
  - a) Traffic controllers and/or traffic control devices are implemented to manage the traffic through and around the work site.
  - b) Carpooling and shuttle buses are implemented to reduce and stagger traffic volumes to

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lessen the safety risk for the duration of the use of the access point before the completion of the intersection treatment and rural property access.

- 8) Compliance and monitoring of the access point while being used concurrently for the discrete construction works identified in the planning secretary request must be addressed within the Traffic Management Plan and be implemented for the duration of the concurrent use of the access point for the construction of the road upgrades and use for the Bellambi Heights construction works (as defined within the Planning Secretary request prepared by Vena Energy dated 12 December 2025).

If you have any questions, please contact Alexandra Long, Development Services Case Officer on 1300 019 680 or email [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alexandra Power".

**Alexandra Power**

Acting Manager of Development Services – West

Transport Planning

Planning, Integration and Passenger

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OFFICIAL

Andrew Brownlow  
Manager Development & Stakeholders (NSW)  
Vena Energy Services (Australia) Pty Ltd  
Suite 1, Level 7, 200 Mary Street  
Brisbane City, QLD, 4000

24/12/2025

---

Subject: Bellambi Heights BESS (SSD-33344237) - Condition B7: Request for restricted construction activities to be undertaken before completion of road upgrade works

Dear Mr. Brownlow,

I refer to your letter (dated 12 December 2025) submitted to the Department of Planning, Housing and Infrastructure (the Department) requesting for restricted construction activities to be undertaken before completion of road upgrade works under Condition B7 of the consent SSD-33344237.

Department has carefully reviewed the proposal and the consultation with Transport for NSW and Mid-Western Regional Council.

In accordance with Schedule 2, Condition B7, as nominee of the Planning Secretary, I conditionally approve the request for restricted construction activities to be undertaken before completion of road upgrade works, subject to the following conditions:

1. restricted construction activities are limited to site mobilisation works, including the installation of fencing, establishment of a temporary construction laydown area, implementation of sediment and erosion controls, setup of site sheds and amenities, and commencement of bulk earthworks;
2. Commence from 12 January 2026 with further information on the timing of the project schedule to be provided and updated within the TMP. TfNSW to be informed of the revised timing and reasoning for the delay to the completion of the road upgrades. The interim arrangement for the use of the access point while the road upgrades are being constructed will be limited to three months, commencing from 12 January 2026;
3. TfNSW is to be notified via email at the commencement and completion of the discrete construction works site mobilisation works, including the installation of fencing, establishment of a temporary construction laydown area, implementation of sediment and erosion controls, setup of site sheds and amenities, and commencement of bulk earthworks;
4. The use of the access point while the road upgrades are being constructed concurrently will be limited to the hours of operation in which the traffic controllers and/or traffic control devices are implemented to manage the traffic through and around the work site, unless:
  - a) A swept path analysis of the design vehicle showing a tangential movement at the Castlereagh Highway and the access point (in the current state) is provided to TfNSW. The swept path analysis must demonstrate that the design heavy vehicle can complete the swept

- path tangentially within the correct lane, without crossing over centrelines and can complete this movement within the existing pavement. This swept path analysis must be provided for all proposed travel directions; and
- b) That the Safe Intersection Sight Distance is assessed and provided for the interim (under construction) state of the access point with the Castlereagh Highway in all turn directions based on the temporary design speed and the existing design speed (if the use of the access point is to occur when the temporary speed zone signage is covered);
5. Revise the existing approved TGS plan for the proposed Interim Restricted Construction Activities to be finalised and approved accordingly;
  6. Vehicle movements will remain under consented vehicle movement limits, with no heavy vehicles requiring escort to be used during the restricted construction activities;
  7. The AM/PM network peak hour is to be limited to a traffic volume that is commiserate with the existing land use of the site, before approval of the Bellambi BESS. For example, generally, rural dwellings generate seven light vehicle trips and one heavy vehicle trip within the network peak hour (at a maximum). Construction traffic can occur at the consented volumes, outside of the network peak hour, subject to:
    - a) Traffic controllers and/or traffic control devices are implemented to manage the traffic through and around the work site; and
    - b) Carpooling and shuttle buses are implemented to reduce and stagger traffic volumes to lessen the safety risk for the duration of the use of the access point before the completion of the intersection treatment and rural property access; and
  8. Compliance and monitoring of the access point while being used concurrently for the discrete construction works identified in the planning secretary request must be addressed within the Traffic Management Plan and be implemented for the duration of the concurrent use of the access point for the construction of the road upgrades and use for the Bellambi Heights construction works (as defined within the Planning Secretary request prepared by Vena Energy dated 12 December 2025).

If you wish to discuss the matter further, please contact Scotney Moore, on 02 9274 6342.

Yours sincerely



Wayne Jones  
Team Leader - Post Approval  
Energy Assessments

As nominee of the Planning Secretary

30 December 2025

Department of Housing, Planning and Infrastructure  
Energy, Resources and Industry  
Wayne Jones, Team Lead Post Approvals

**SSD 33344237: BELLAMBI HEIGHTS BESS - PLANNING SECRETARY REQUEST CONDITION B7**

Thank you for your letter (dated 24 December 2025). Please see below clarification and acceptance of the conditions.

1. Accepted and consistent with submitted TMP (Rev D, 12 December 2025).
2. Updating the TMP again to capture an evolving circumstance with further information on timing and reasoning is unnecessary. **Vena will provide a status update to TfNSW and DPPI in week ending 9 January.** The roadwork's Principal Contractor returns 5 January.
3. Accepted. **Vena will notify TfNSW via email on commencement and completion.**
4. For clarity. Site access will only happen when traffic controllers and/or traffic control devices are in affect. Consistent with submitted TMP.
5. Vena's understanding is the approved TGS does not need to be revised and that the appropriate TfNSW approval authorization is via the WAD.
6. Accepted and consistent with submitted TMP.
7. Noted.
8. Accepted. Compliance and monitoring are addressed in submitted TMP.

We trust the above enables final approval.

Again, I am mindful of the time of year and appreciate your consideration.

Yours sincerely,

*Andrew Brownlow*

Andrew Brownlow  
Manager, Development & Stakeholders