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Our Reference: G36801L-01F

21 August 2026

Morwell FlexGen Pty Ltd
C/- Spiire
Level 6, 414 La Trobe Street
MELBOURNE VIC 3000

Attention: Akemi Traill

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Dear Akemi,

454 Commercial Road, Morwell – Proposed Peaking Generation Facility Traffic Engineering Assessment

Further to your instructions, please find following our traffic engineering assessment of the proposed peaking generation facility at 454 Commercial Road, Morwell

The following report provides an assessment of the traffic generation and impacts, vehicle access arrangements and loading layout associated with the proposal.

Furthermore, this report includes a preliminary assessment of traffic generation and impacts during the construction phase.

Subject Site

The overall site of the proposed development is located on the south side of Commercial Road and west side of Monash Way, in Morwell.

The overall subject site is irregular in shape with an area of approximately 27.7 hectares. The site has frontages to Commercial Road to the north, Monash Way to the east and Porters Road to the south.

The subject site has vehicle access via a 15 metre wide gravel crossing with Commercial Road, located approximately 170 metres west of Monash Way.

The subject site is zoned 'Industrial 1 Zone (IN1Z)' under the Latrobe Planning Scheme. Land zoning in the immediate vicinity of the site comprises a mixture of industrial and special use zones.

A locality plan and an aerial photograph of the site are provided at Figure 1 and Figure 2, respectively.

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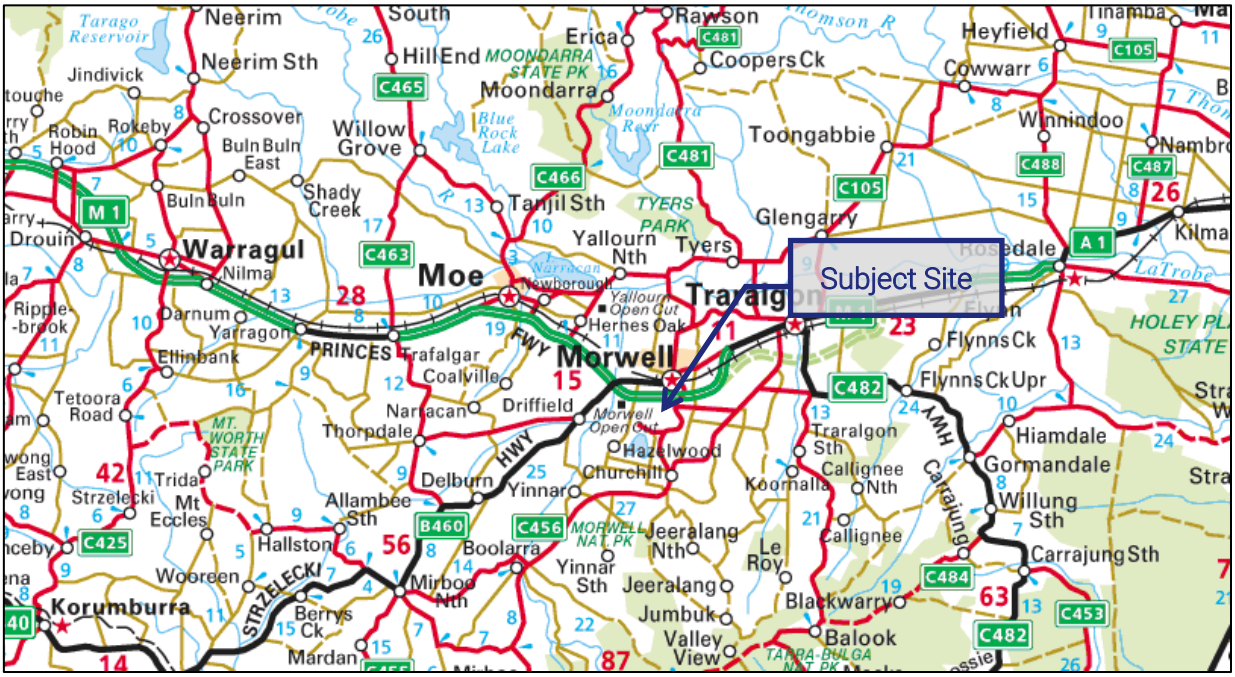
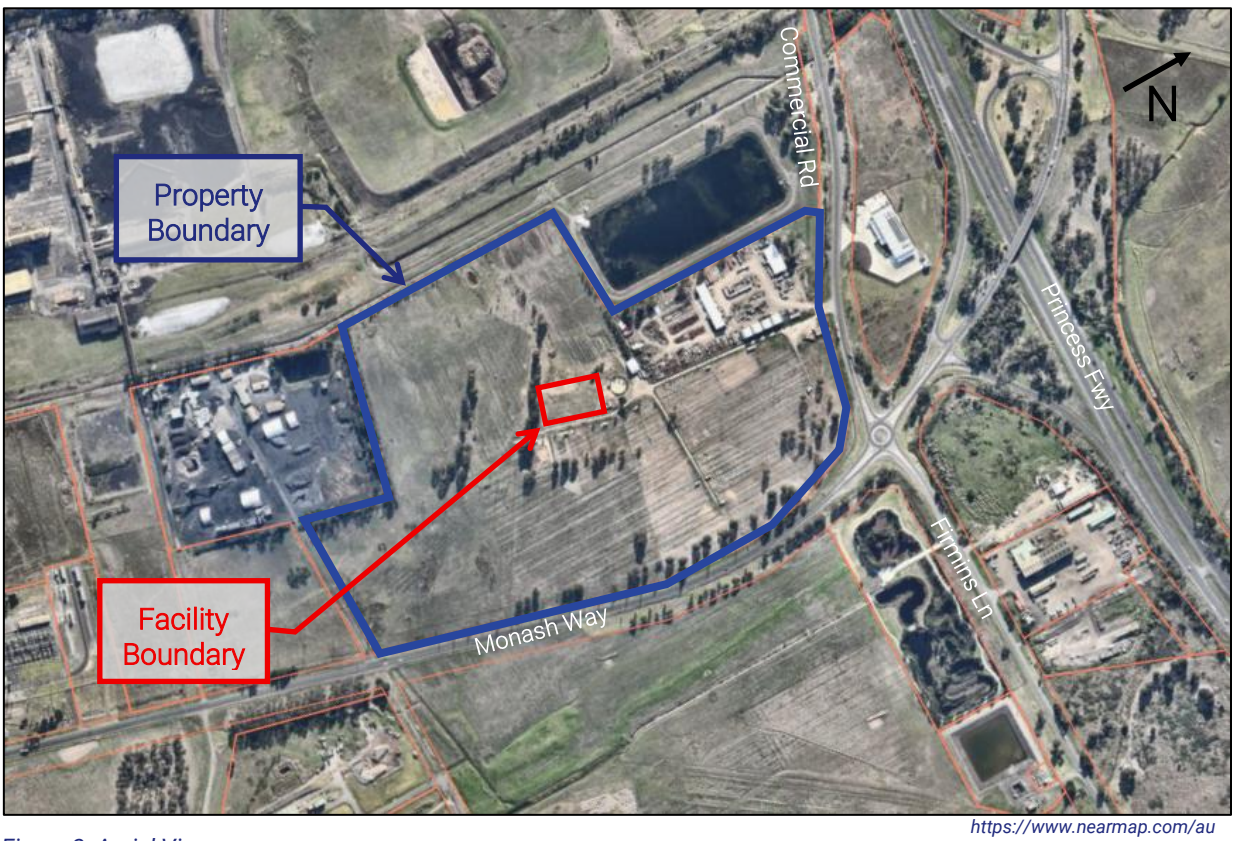


Figure 1: Locality Plan



https://www.nearmap.com/au

Figure 2: Aerial View

Existing Road Network

Commercial Road is an arterial road under the management of VicRoads and is zoned 'Transport Zone 2 – Principal Road Network' under the Planning Scheme.

Commercial Road is generally aligned in an east-west direction between Monash Way to the east and Hazelwood Drive to the west.

In the vicinity of the site, Commercial Road has a sealed carriageway, accommodating a single lane of traffic in both directions, generally with sealed/gravel shoulders on both sides.

A signed speed limit of 80 km/h applies to Commercial Road in the vicinity of the site.

Monash Way is an arterial road under the management of VicRoads and is zoned 'Transport Zone 2 – Principal Road Network' under the Planning Scheme.

Monash Way is aligned in a north-south direction along the eastern boundary of the overall site.

In the vicinity of the site, Monash Way has a sealed carriageway, accommodating a single lane of traffic in both directions, generally with sealed/gravel shoulders on both sides

A signed speed limit of 100km/h applies to Monash Way, before decreasing to 80km/h upon approaching the roundabout intersection with Commercial Road.

Porters Road extends west approximately 200 metres from Monash Way along the southern abuttal of the site. Porters Road is nominated as an 'Access Minor' Road under the Latrobe City Council Public Road Register.

In the vicinity of the site, Porters Road has a sealed carriageway of approximately 6 metres wide, accommodating two-way traffic, plus grass shoulders on both sides.

B-Double Road Network

The VicRoads heavy vehicle (B-Double) map, illustrated in Figure 3, sets out routes that have been assessed to be suitable for heavy vehicles to use. Proximate to the subject site, roads that would be appropriate for heavy vehicles to utilise include the following:

- Commercial Road,
- Monash Way,
- Princes Fwy, and
- Firmins Lane.

We note that the proposed trucks for deliveries are semi-trailers (20 metre) which are smaller than B-Doubles and do not require specific B-Double route approval.

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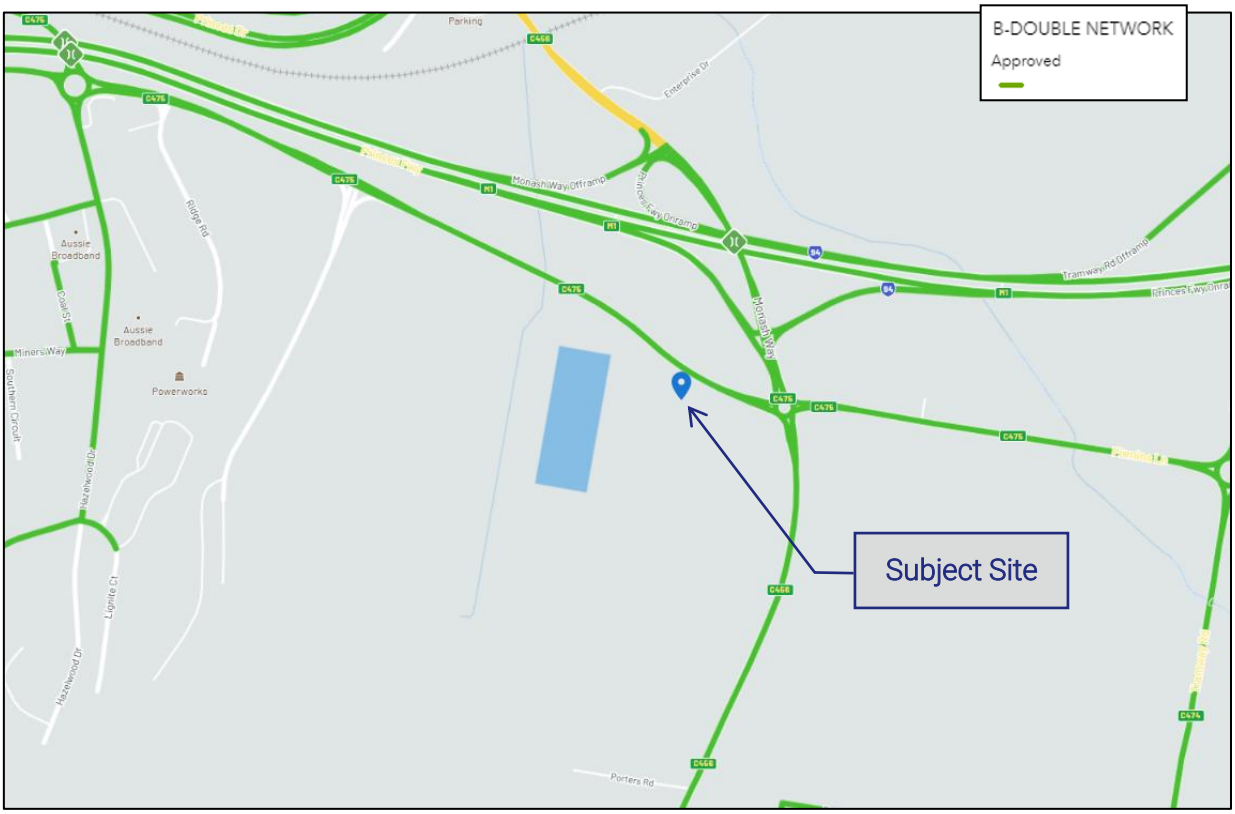


Figure 3: VicRoads B-Double Road Network Map

https://maps.nhvr.gov.au/

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Proposal

The proposal is for a Peaking Generation Facility (Facility). The facility is expected to provide energy market and local network stability by operating at times of elevated demand and/or wholesale energy prices.

The facility will consist of a series of diesel storage, generators and associated maintenance structures.

The facility will be un-staffed except for general maintenance staff who will attend site once to twice per week.

On average, the facility will receive approximately one fuel delivery (24,000L semi-trailer) per fortnight, or 50 deliveries per annum.

The proposal intends to utilise an existing internal access road which bisects the site in a north-south direction. Vehicle access will be afforded via the existing gravel crossover with Commercial Road.

Internal access roads are to be of a crushed rock treatment.

An internal court bowl with a 15 metre radius is proposed which will allow trucks up to a semi-trailer to turn around and exit the site in a forward direction.

An informal car parking area is to be accommodated at the southern end of the facility.

A concept plan of the proposed facility is attached at Appendix A.

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Car Parking Considerations

The car parking requirements for the proposed development are outlined under Clause 52.06 of the Latrobe Planning Scheme. The purpose of Clause 52.06 is:

- *To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.*
- *To support sustainable transport alternatives to the motor car.*
- *To promote the efficient use of car parking spaces through the consolidation of car parking facilities.*
- *To ensure that car parking does not adversely affect the amenity of the locality.*
- *To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.*

Where a land-use is not specified in Table 1 of Clause 52.06-5, car parking spaces must be provided to the satisfaction of the Responsible Authority. 'Energy generation facility' is not listed within the table, and accordingly parking is to be provided to the satisfaction of the responsible authority.

As noted above, the facility will be un-staffed except for general maintenance staff who will attend if required, typically once to twice per week for basic inspections and routine/minor maintenance.

The application proposes an informal car parking area at the southern end of the facility, accommodating in the order of 3 car spaces. We note there will be ample overflow car parking space adjacent to the internal court bowl for the very limited occasions additional spaces are required.

We are satisfied the proposed informal car parking area will satisfactorily accommodate the anticipated parking demands of maintenance staff with vehicles up to a 6.4 metre long small-rigid vehicles (SRV).

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Traffic Considerations – Ongoing Operations

Truck Routes

The types of trucks being considered for this facility are up to the size of a 20 metre long semi-trailer, which falls under the general classification of heavy vehicles. In this regard, this type of truck is permitted on all roads, except those with specified load limits or if the trucks exceed their general mass limit.

The proposed access route for heavy vehicles travelling to/from the site is as follows:

Commercial Road – Monash Way – Princes Freeway

These roads are all included within the B-Double Road Network, noting the proposed delivery trucks are semi-trailers (20 metre) which are smaller than B-Doubles and therefore do not require specific B-Double route approval.

Traffic Generation and Impacts

As noted above, the facility will be un-staffed except for general maintenance staff who will attend if required every few months.

For the purposes of this analysis, we will assume a maintenance staff will attend the site once to twice per week, or about 75 times per annum. They will generate a single arrival and departure movement per visit.

In addition, the facility will receive approximately one fuel delivery (24,000L semi-trailer) per fortnight or 50 deliveries per annum.

A summary of the yearly anticipated traffic generation of the proposal is summarised at Table 1.

Table 1: Proposed Traffic Generation - Yearly

	Arrival Movements	Departure Movements	Total Movements per annum
Maintenance Staff	75	75	150
Fuel Delivery	50	50	100
Total	125	125	250

Based on the above, the proposal will generate a total of approximately 250 movements per annum, inclusive of arrival and departure movements.

This is a very low level of traffic, equivalent to approximately one vehicle arrival and associated departure being about once per business day on average. We expect that the traffic will be accommodated by the surrounding road network and will not have a discernible impact to Commercial Road, Monash Way or nearby intersections.

Commercial Road is constructed with a sealed carriageway, accommodating a single lane of traffic in both directions. This includes shoulders on both sides including a wide shoulder on the south side which accommodates left-turn movements into the existing site access.

With consideration of the very low anticipated additional traffic volumes, the existing configuration of Commercial Road at the site access is considered adequate, and no mitigation works are warranted.

Traffic Considerations - Construction Phase

The construction phase will be carried out over three stages with an overall construction period of approximately 9 months. The staging and indicative timing are as follows:

- Stage 1: Site Establishment/Foundations – ~3 months
- Stage 2: OEM Equipment Delivery/Assembly – ~3 months
- Stage 3: Commissioning - ~3 months

The proposed construction hours are to typically from 7:00 am to 3:00 pm, Monday to Saturday across all stages. However, at times on weekdays only construction may extend up to 6:00 pm.

A detailed schedule of expected vehicles for the construction phase is shown in Appendix C.

Stage 1 - Site Establishment/Foundations

During the Site Establishment/Foundations stage, we have been advised that there will be approximately 12 staff on-site per day. For a conservative assessment, it has been assumed that each construction staff member will travel to the site in a separate vehicle, resulting in a total of 12 light vehicles.

Rigid trucks are expected on-site an average of up to 7 times per week over a 10-week period. For a conservative assessment, we have assumed 1 Rigid Concrete Truck delivery per day.

Truck and Dog Trailers (10 metres) are expected to access the site up to 5 times per week over a 9-week period, equating to approximately one delivery per weekday.

Up to 2 semi-trailers are expected on-site up to 2 times per week over a 3-week period. For a conservative assessment, we have assumed 1 Rigid Truck delivery per day.

A summary of the Stage 1 truck deliveries is provided at Table 2.

Table 2: Stage 1 (Foundation) Vehicles – Average Per Day

Activity	Light Vehicles (Average per day)	Rigid Trucks (Average per day)	10m Truck and Dog Trailer (Average per day)	Semi-trailer (Average per day)	Total (Average per day)
Establishment/ Foundation	12	1	1	1	15

Therefore, it is expected that there will be a total of 30 vehicle movements per day (comprising 15 arrivals and 15 departures) during Stage 1. This includes up to 3 truck arrivals and 3 truck departures per day.

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Stage 2 - OEM Equipment Delivery/Assembly

During the OEM Equipment Delivery/Assembly phase:

- Up to 12 staff members are expected on-site each day, corresponding to 12 light vehicles.
- An average of up to 10 rigid trucks will be required per week, with two trucks conservatively assumed per day.
- Up to 4 Truck and Dog trailers (10 metres) will be required per week, with one truck and dog trailer per day conservatively assumed.
- Up to 2 semi-trailers will be required per week, with one semi-trailer per day conservatively assumed.

A summary of the Stage 2 truck deliveries is provided at Table 3.

Table 3: Stage 2 (OEM Equipment Delivery/Assembly) Vehicles – Average Per Day

Activity	Light Vehicles (Average per day)	Rigid Trucks (Average per day)	Truck and Dog (Average per day)	Semi-Trailer (Average per day)	Total (Average per day)
OEM Equipment Delivery/Assembly	12	2	1	1	16

It is expected that there will be a total of 30 vehicle movements per day (comprising 15 arrivals and 15 departures) during Stage 2. This includes 3 truck arrivals and 3 truck departures per day.

Stage 3 - Commissioning

During the Commissioning phase it is expected that there will be up to approximately 6 staff members on-site corresponding to 6 light vehicles. There are no truck deliveries expected during the commissioning stage.

A summary of the Stage 3 vehicles is provided at Table 4.

Table 4: Stage 3 (Commissioning) Truck Deliveries – Average Per Day

Activity	Light Vehicles (Average per day)	Total (Average per day)
Commissioning	6	6

Therefore, it is expected that there will be a total of 12 vehicle movements per day (comprising 6 arrivals and 6 departures) during Stage 3.

Total Construction Traffic Generation

Traffic generation during the construction phase will be temporary, lasting for approximately 9 months.

The highest number of vehicle movements is expected during Stages 1 and 2, with approximately 30 vehicle movements per day. Of these, there are up to 3 truck arrivals and 3 truck departures per day.

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This level of daily traffic generation including truck is relatively low. Accordingly, we are satisfied that the existing configuration of the vehicle access with Commercial Road and the surrounding road network has sufficient spare capacity to accommodate the low level of temporary traffic generated during the construction phase.

Traffic Considerations – Decommissioning Phase

The decommissioning phase of the project is expected to occur within 25 to 40 years; however, the timing may vary depending on factors such as the wholesale energy market, network demand, and the availability of alternative technologies.

The decommissioning phase is expected to take place across an approximate 3-month period and will involve the removal of the genset units, fuel storage tanks, and other associated equipment.

The decommissioning phase is anticipated to have a similar total of vehicles to the construction phase. Albeit, there will be no concrete rigid trucks. A summary of the decommission phase vehicles is provided at Table 5.

Table 5: Decommissioning Phase – Average Per Day

Activity	Light Vehicles (Average per day)	Rigid Trucks (Average per day)	Semi-Trailer (Average per day)	Total (Average per day)
Decommissioning	10	1	1	12

Therefore, it is expected that there will be a of 24 vehicle movements per day (comprising 12 arrivals and 12 departures), during the decommissioning stage. This includes 2 truck arrivals and 2 truck departures per day.

This level of traffic generation during the decommissioning phase is relatively low and we are satisfied that it will be adequately accommodated by the surrounding road network and intersections.

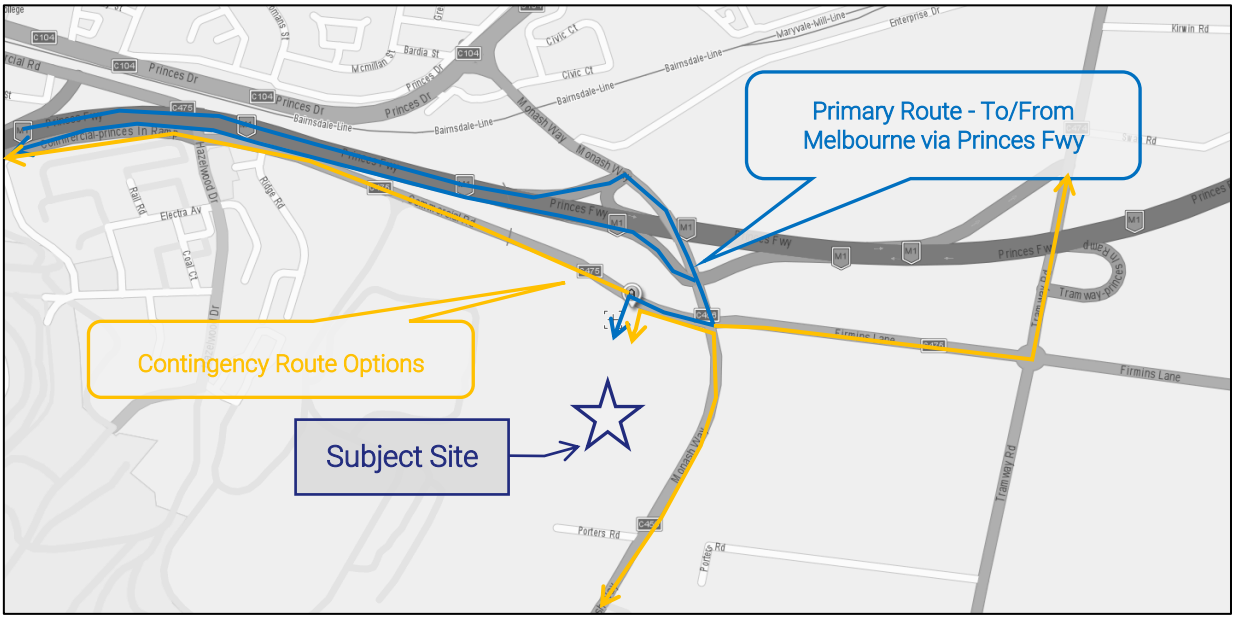
Truck Routes

The truck route options for accessing the site are shown in Figure 4. We have been advised that construction phase truck movements will primarily occur to and from Melbourne via the Princes Fwy to the north at its interchange with Monash Way, as identified as Primary Route in Figure 4.

The Commercial Road / Monash Way roundabout has a semi-mountable island and is regularly used by large trucks as part of the access route from Princes Fwy to various other sites along Commercial Road, Firmins Lane and Monash Way.

Importantly, the identified routes are part of Victoria's approved B-Double network, and all intersections along these routes can accommodate the necessary turning movements of large trucks.

There are several contingency route options available if required that are all part of Victoria's gazetted B-Double network as shown in Figure 4.



Source: http://www.street-directory.com.au/

Figure 4: Proposed Construction Access Route

Internal Road Layout & Access

Vehicle access will be afforded via the existing gravel crossover with Commercial Road, which will accommodate turning movements.

The internal gate, located within the setback, should be widened to 5 metres to comfortably accommodate a semi-trailer.

The existing internal gravel access road will be retained and has an approximate 3 to 4 metre wide carriageway. This will satisfactorily accommodate all service and loading vehicles. There are existing opportunities for passing are provided along the existing internal access road.

Any new internal access roads and car parking/loading areas are to be constructed with a crushed rock treatment.

An internal court bowl with a 15 metre radius is to be provided at the southern end of the site which will allow trucks up to a 20 metre semi-trailer to enter the site in a forward direction, turn around at the dead-end, and then exit the site in a forward direction.

Swept paths demonstrating access for a semi-trailer are attached at Appendix B.

We are satisfied that the proposed internal access road and connection to Commercial Road will adequately accommodate relevant service and emergency vehicles.

There is an existing access gate to the site via Porters Road which provides secondary/ emergency access to the site.

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Loading Considerations

Clause 65.01 of the Planning Scheme states that the responsible authority must consider a number of matters as appropriate including:

- *The adequacy of loading and unloading facilities and any associated amenity, traffic flow and road safety impacts.*

The proposal will accommodate access for a 20 metre long semi-trailer.

Loading activities for the proposed facility will be mostly associated with fuel deliveries and are anticipated to occur relatively infrequently and will be entirely managed on-site within the internal accessway and proposed court bowl.

Swept paths demonstrating access for a semi-trailer are attached at Appendix B.

We are satisfied that loading activities associated with the proposal can be appropriately accommodated within the site via the internal roads and court bowl.

CFA Vehicle Access Considerations

The internal access road will generally satisfy the following relevant criteria to meet CFA vehicles access guidelines as follows:

- *All-weather construction.*
- *A load limit of at least 15 tonnes.*
- *The average grade must be no more than 1 in 7 (14.4 per cent) (8.1 degrees) with a maximum of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50m.*
- *Have a minimum trafficable width of 3.5m of all- weather construction*[1].
- *Be clear of encroachments for at least 0.5m on each side and 4m above the accessway.*
- *Dips must have no more than a 1 in 8 (12.5 per cent) (7.1 degrees) entry and exit angle.*
- *Incorporate a turning area for fire fighting vehicles close to the building.*

Importantly, emergency vehicles can enter and exit the site in a forward direction and turn around within the site.

There is an existing access gate to the site via Porters Road which provides secondary/ emergency access to the site.

Based on the above, the emergency vehicle access arrangements are considered suitable.

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[1] The existing internal gravel access road will be retained and has an approximate 3 to 4 metre wide carriageway of crushed rock construction. Whilst there are some parts that have a carriageway width that is slightly narrower than 3.5m as specified under the CFA guideline, we are satisfied that the existing width will be sufficient to accommodate truck movements including CFA vehicles.

Conclusions

Having undertaken a detailed traffic engineering assessment of the proposed peaking generation facility at 454 Commercial Road, Morwell, we are of the opinion that:

a) The proposed on-site parking provisions are appropriate and will suitably accommodate the predicted occasional maintenance staff parking demands.

b) The existing vehicle access connection with Commercial Road will suitably accommodate the proposed vehicle movements.

c) The layout of the internal accessway and court bowl are in accordance with the relevant guidelines, and a crushed rock surface is acceptable.

d) Loading activities can be appropriately accommodated within the site via the internal roadway and court bowl.

e) Traffic generated by the proposal will be very low and will not have a discernible impact to Commercial Road, Monash Way or nearby intersections during each of the construction, on-going operation, and decommissioning phases.

f) Emergency vehicle access will be appropriately provided by both existing access points from Commercial Road and Porters Road.

Overall, we are satisfied that there are no traffic engineering reasons why the proposed peaking generation facility at 454 Commercial Road, Morwell should not be approved.

Please contact Timothy Amanatidis or Brent Chisholm at Traffix Group if you require any further information.

Yours faithfully,

TRAFFIX GROUP PTY LTD



BRENT CHISHOLM

Senior Associate

Registered Professional Engineer No. PE0007582

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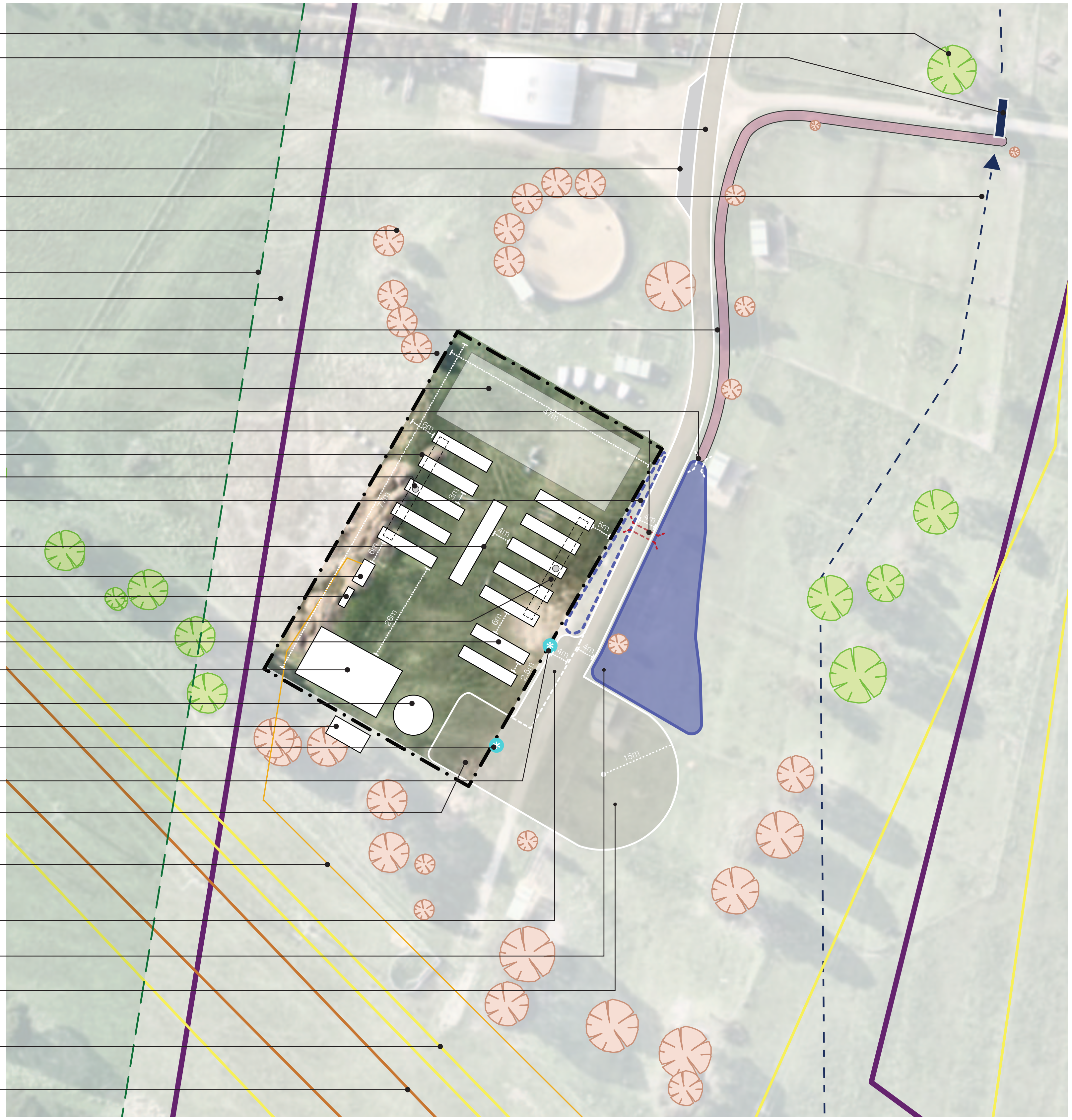
Appendix A

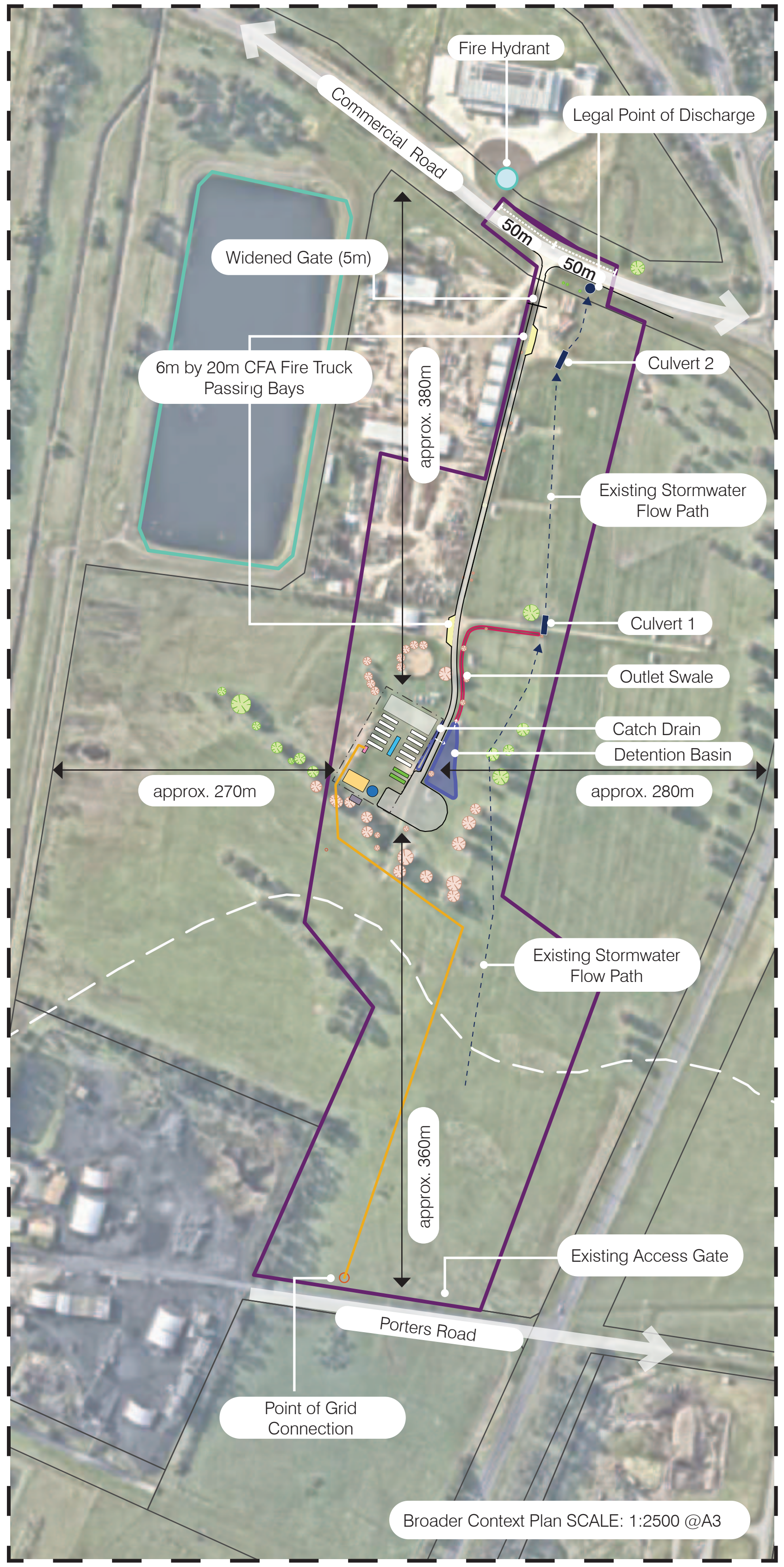
Plans

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CONCEPT PLAN

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CONCEPT LAYOUT PLAN
454 Commercial Road
MORWELL, VIC

DRG NO.	REV	DATE	DES/DOC	AUTH
322820 UD ID 01 CAD REV. 01	15	19/08/2026	AT	TP

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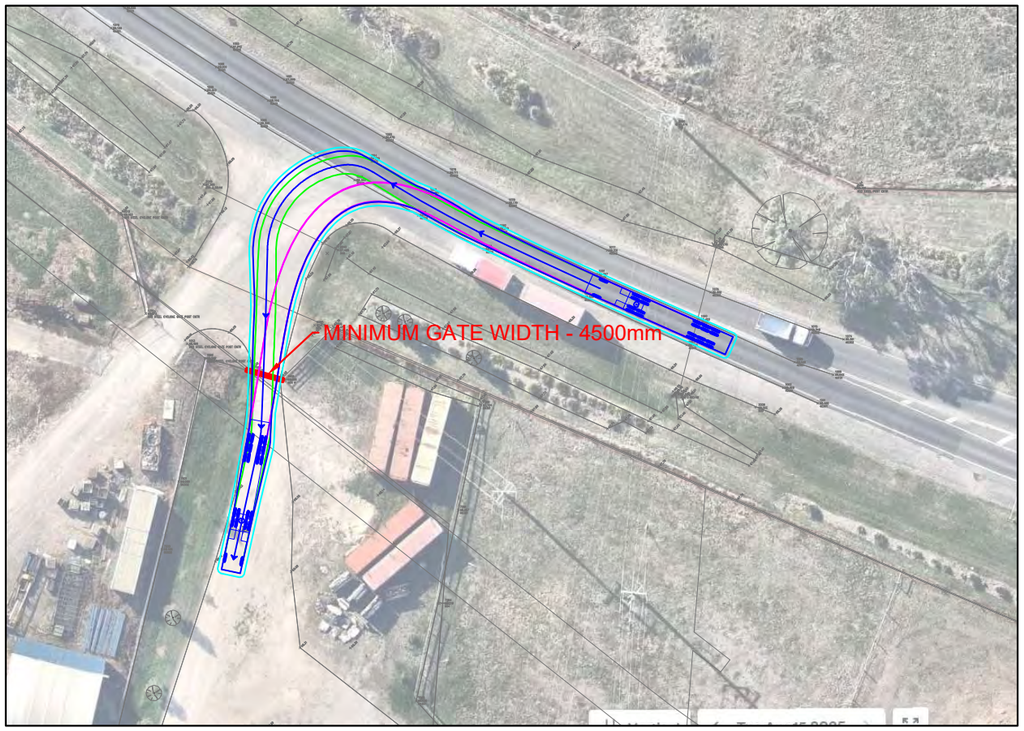
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Appendix B

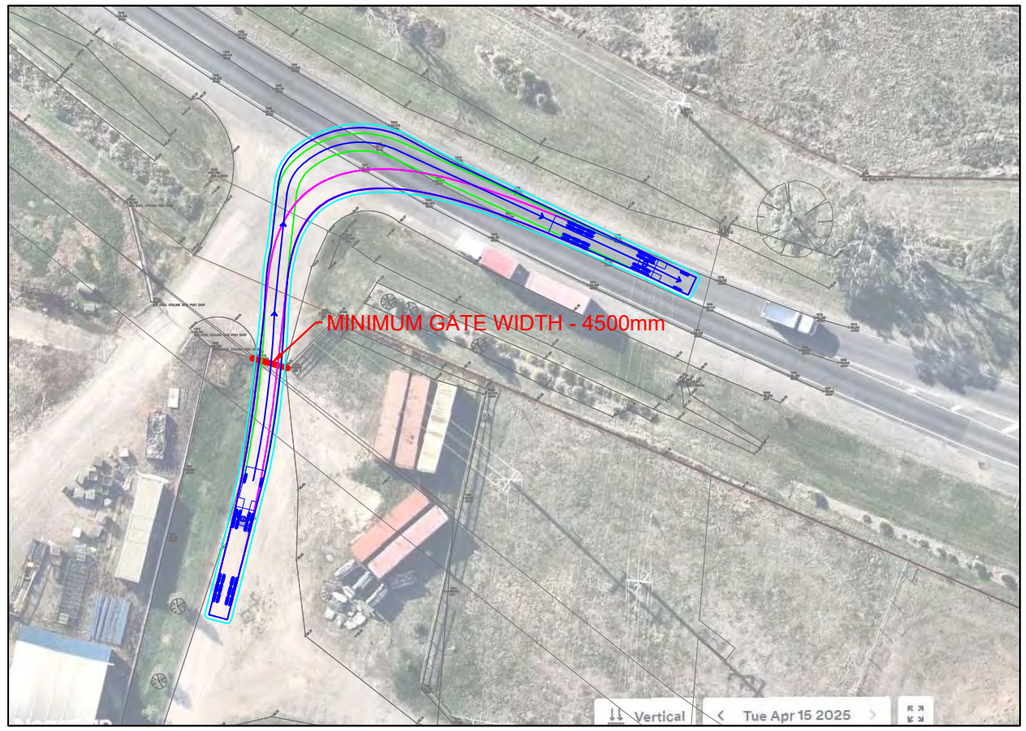
Swept Paths

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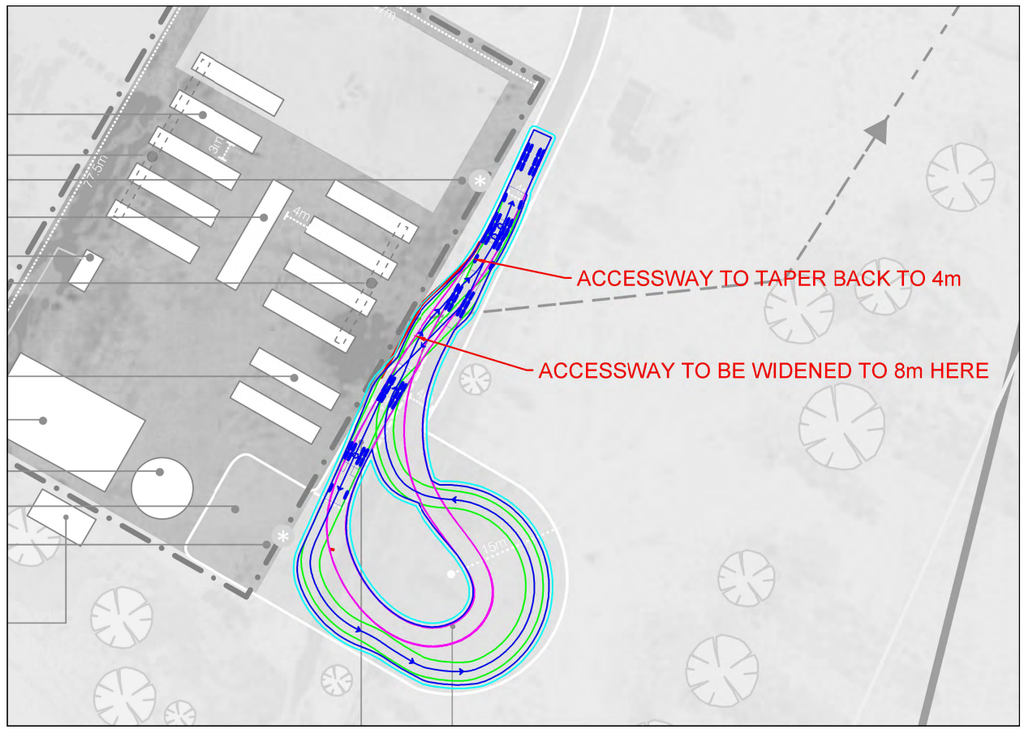
SITE ACCESS - INGRESS



SITE ACCESS - EGRESS



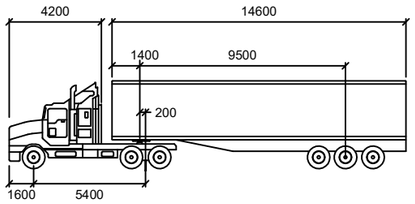
INTERNAL LOADING ACCESS & TURN AROUND



VEHICLE PROFILE

VEHICLE USED IN SIMULATION

(VEHICLE SPEED - 5KM/H)



20m semi-trailer

mm

Tractor Width :	2500	Lock to Lock Time:	6.0
Trailer Width :	2500	Steering Angle :	28.3
Tractor Track :	2500	Articulating Angle :	70.0
Trailer Track :	2500		

LEGEND

REAR WHEELS — VEHICLE BODY

FRONT WHEELS — BODY CLEARANCE

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REV	DATE	NOTES	DESIGNED BY	CHECKED BY
A	11/09/2025	TP APPLICATION	T. AMANATIDIS	B. CHISHOLM

454 COMMERCIAL ROAD, MORWELL

PROPOSED PEAKING GENERATION FACILITY

GENERAL NOTES:

BASE PLANS BY SPIIRE, DATED JULY 2025.

FILE NAME: G36801-01

SHEET NO.: 01

N

SCALE: 1:800 (A3)

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Appendix C

Preliminary Construction Schedule and Vehicle Estimates

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Estimated Site Vehicle Movements Schedule

Item		item qty	vehicle type, quantity & source: semi	rigid	truck & dog trailer	std car/ute	likely source	Vehicle Movements Per Week
(a) Plan, Equipment and Materials Deliveries								
plant and equipment								
gensets	total	8	8				Melb	8
fuel storage	total	2	2				Melb	2
other major equip	total	1		4			Melb	4
misc/buildings	total	1		4			Morwell	4
materials/misc								
concrete	total			35			Morwell	35
crushed rock [1]	total				54		Traralgon	54
other/misc [2]	total			70			Melb	70
Total			**10**	**113**	**54**			
(b) Staff/Contractors								
no contractors onsite	daily					12		
light vehicles onsite	daily					12		

Construction Week >	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34
	> establishment/foundations									> OEM equip delivery / "assembly"															> commissioning									
gensets										2	2	2	2																					
fuel storage																	2																	
other major equip														2	2																			
misc/buildings								2	2																									
concrete						5	5	5	5	5	5	5																						
crushed rock [1]			2	4	4	4	4	4	4	4	4	4	4	4	4	4																		
other/misc [2]			3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3									
Total	**0**	**0**	**5**	**7**	**7**	**13**	**12**	**14**	**14**	**14**	**14**	**14**	**9**	**9**	**9**	**7**	**5**	**3**	**3**	**3**	**3**	**3**	**3**	**3**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
no contractors onsite	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	8	8	8	6	6	6	6	6	6	6	6	6
light vehicles onsite	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	8	8	8	6	6	6	6	6	6	6	6	6

[1] Conservative/upper limit estimate
[2] Estimated for all minor plant/equipment and materials

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