1. Purpose

1. Introduction

This Traffic Management Plan (TMP) responds to the specific requirements of the consent condition 5.4(C) for Development Application DA-318-12-2004-I, as modified by Modification 3 approved on 30 November 2017. This TMP identifies measures to minimise and mitigate traffic impacts associated with the Allied Pinnacle Grain Milling Facility operations.

With reference to light passenger vehicles, heavy vehicles and on-site support vehicles at the Allied Pinnacle Grain Milling Facility, this sub-plan will address:

- vehicle noise practices
- vehicle exhaust emissions
- on-site speed limits
- vehicle movement scheduling
- load coverage practices
- a system of audited management practices and
- contract information for sub-contracted drivers

Allied Pinnacle do not operate a fleet of trucks.

All truck movements on site are undertaken by service providers or contract operators. The control measures in this document have been developed to reflect this.

The mill will be capable of receiving and processing up to 300,000 tonnes of raw materials per year.

All raw materials will arrive at the site via a purpose built railway spur off the main southern rail line.

The goods will be off-loaded from the train by conveying grain into storage silos. Trucks will distribute packaged and bulk goods from the site once processed.

Bulk goods will be dumped into sealed tankers, and packaged products will be loaded onto curtain-sided trailers by a forklift.

1.1 Requirements for this plan

Consent condition 5.4(c) requires the TMP to specifically address the requirements outlined in Table 1. Table 1 also provides a reference to where the requirements have been addressed in this plan.

Table 1 - Requirements of consent condition 5.4(c)

Requirements	Reference to this plan
Driver training to ensure that noisy practices such as the use of compression engine brakes are avoided or minimised	Not applicable. Allied Pinnacle do not operate their own fleet of trucks
Best exhaust emission and noise practice in the selection and maintenance of vehicle fleets	
Speed limits to be observed along routes to and from, and within the site	Section 6.2
Movement scheduling where practicable to minimise noise impacts during sensitive time of the day	Section 4.2
Behavioural requirements and load coverage specifications for drivers	Section 6.2
A system of audited management practices that identifies non-conformances, initiates and monitors corrective and preventive actions (including disciplinary	Section 7

action from breaches of procedures), and assesses the implementation and improvement of the Strategy; and	
Clauses in conditions of employment or contracts for drivers that require adherence to the noise minimisation procedures and facilitate implementation of disciplinary actions for breaches of the procedures	Section 6.1

2. Legislative requirements and guidelines

Key legislation and guidelines relevant to traffic management is provided in Table 2.

Table 2 - Key legislation and guidelines

Legislation/Guidelines	Applicability
Protection of the Environment Operations (Noise Control) Regulation 2008	The regulation aims to prevent high noise levels from vehicles caused by lack of maintenance, deliberate tampering or inappropriate use • Noise levels from motor vehicles used on roads and road related areas must not exceed specified maximum noise levels. • Noise levels from motor vehicles used off-road must not be offensive. • Noise control equipment on motor vehicles used on roads or related areas must not be defective and must be securely in place. • A person must not modify a vehicle so that it exceeds the specified maximum noise level
Road Transport (Safety and Traffic Management) Act 1999	Road Rule 224 - requires horns not be used unless it is necessary to warn other road users or animals of the vehicle's approach, or if the horn is being used as a part of an anti-theft device. Road Rule 291 - requires that a person must not start a vehicle, or drive a vehicle, in a way that makes unnecessary noise or smoke, e.g. unnecessarily revving a vehicle when it is stationary or repeatedly opening and closing the throttle when the vehicle is in motion. Police officers can issue three demerit points for this offence. Road Rule NSW, 291-1 - requires that the engine of a stationary vehicle be turned off to prevent noise, other than for stoppages in traffic or examinations due to engine malfunction
Protection of the Environment Operations (Clean Air) Regulation 2002	Part 3 of the Regulation covers motor vehicles and motor vehicle fuels. In particular, the Regulation deals with the following matters: • the emission of air impurities, including excessive smoke from motor vehicles • the compulsory fitting and maintenance of anti-pollution devices, and exemptions from these requirements

	• the method of transfer of petrol into a vehicle's fuel tank • benzene content and volatility of petrol
Road Transport (Vehicle Registration) Regulation 2007	Limits the overall size (width, height and length) and some internal dimensions of vehicles to ensure that they have adequate manoeuvrability and that they are compatible with road systems and other traffic. A permit is required from the RTA to exceed dimensions if the length, rear overhang, forward projection, width or height of a vehicle exceeds the limits allowed by the Regulation.
RTA Vehicle Standards Information Sheet No. 5 – Vehicle Dimension Limits	Sets out the limits for vehicle length, height and width, ground clearance, projecting loads and equipment, loading space, rear overhang, turning circle and axle groups and suspension systems.
Road Transport (Mass, Loading, & Access) Regulation 1996	Requires that loads be restrained to at least a minimum performance standard. These minimum performance standards are designed to ensure that loads are secured to the vehicle in a way that means they do not move or come free

3. Summary of operations

3.1 Train

All rail deliveries of grain are contracted to Southern Shorthaul Railroad (SSR).

Trains will arrive on average every two days, with approximately five per fortnight. The trains can arrive at any time, but will normally be unloaded between 07:00 and 19:00.

When rail breakdowns occur grain deliveries will be made by trucks resulting in increased road traffic to the facility.

3.2 Heavy Vehicles

Several different types of trucks will be used for delivering products and performing maintenance services at the mill. Bulk products will comprise approximately 80% of all heavy vehicle movements and products will be loaded into sealed semi / B-double tanker trailers.

The remaining 20% of products will be packaged on pallets and loaded on to curtain-sided truck and dog / bogie trailers using three gas powered forklifts.

Trucks will operate 24 hours a day, everyday, resulting in approximately 30 trips a day. Bulk goods trucks will constitute approximately 20 trips per day and around four trips will be generated by packaged goods.

An additional three to six trips will be generated by deliveries. Night time operation will be limited in most cases by sub-contractor availability and supply flows. This will result in an average of two trips per hour between 0500 and 1900.

Allied Pinnacle do not own or operate and truck movement on the site. All truck movements on site can be classified as either:

- Casual providers – service providers such as deliveries and waste management
- Contract providers - heavy vehicles associated with bulk products

3.3 Other Vehicles

There are approximately 40 staff who drive to work for three different shifts resulting on average in 54 private vehicle trips. There will also be weekly deliveries and service supply providers coming to the site: including pest management, fire alarm servicing, office cleaners, gas supplies etc.

These services will amount to an additional five to six vehicle movements per week.
In addition to the trips to the site there will be trips within the site. These will be conducted with three fork lifts to load and unload deliveries. One ride on lawnmower will also be used on-site for grounds maintenance.

3.4 Site access

On approach to the Allied Pinnacle Grain Milling Facility along Picton Road there is a right turn slot (single lane for vehicles to merge into and slow-down in order to enter the site without impeding traffic), this lane is approximately 200 metres in length.

There are two exits from the site, with the main access road having a protected right turn bay for exiting vehicles.

These interchange improvements address issues raised in the Wollondilly Shire Council DCP 20 and have been approved by the RTA.

4. Performance objectives

4.1 On-site speed limits

There will be three separate traffic areas with two different speed limits. Picton Road is the first road that the vehicles will travel along and the RTA has indicated a safe speed limit of 100km/h on either side of the access road in and out of the Allied Pinnacle site.

The access road leading into the site is posted with a speed limit of 10km/h in both directions. Once the vehicles are on-site, a posted speed limit of 10km/h applies to the entire site.

The mill has installed speed humps around the site in order to ensure that vehicles abide by this speed limit.

Noise levels are reduced through low speed limits. As a consequence of the speed limit, noise is reduced by greatly reducing the need for rapid acceleration and use of compression braking.

Noise reduction is reinforced through management practices that restrict the use of compression braking on-site, these practices are referred to in Section 6.1.

4.2 Movement scheduling

Production will vary depending on customer demand throughout the year; this will result in varying schedules of truck movements.

When possible these movements will take place outside peak periods. During periods of heavy production some truck movements may be made during these more sensitive periods

5. Potential traffic impacts

5.1 Traffic impacts

The total GHV traffic generation from the site is approximately 30 trips per day to and from the site.

While there has been an increase in traffic associated with the site, compared to the EIS predictions, there have been no complaints or incidents regarding the movement of traffic to and from the site, or an observed impact to traffic flow or increased congestion on Picton Road from the additional traffic movements.

On 9 June 2016, DPE sought further clarification from Allied Pinnacle and required consultation be undertaken with RMS and Council. Allied Pinnacle engaged GHD to undertake a traffic impact assessment, which included consultation with RMS and Council. The assessment concluded that the impacts were negligible and consistent with the predictions in the EIS.

RMS formally advised DPE that the traffic movements are considered acceptable (letter dated 22 September 2016).

5.2 Noise impacts

Noise modelling scenarios were performed (Heggies 2004) as part of the noise and vibration impact assessment undertaken as part of the EIS for projected vehicle movements and loading / unloading activities.

The increase in truck movements will result in an increase of less than 0.5 dBA for residents affected along Picton Road. Night-time loading and unloading activities indicate that the night-time sleep disturbance criteria will not be exceeded.

Vehicle operations within the Allied Pinnacle Grain Milling Facility will result in minimal noise impacts to surrounding residents.

5.3 Exhaust emission impacts

The relatively small increase in the number of vehicle trips compared to existing traffic along Picton Road will result in very small impacts from exhaust fumes.

6. Traffic management measures

The following traffic management measures have been identified to address the nominal traffic impacts as identified in Section 5.

6.1 Physical measures

The following physical measures are provided on-site to reduce traffic impacts on site:

- Landscaping of boundaries in accordance with the Landscape Management Plan
- Paved surfaces and one-way traffic routing on site for efficient vehicle movements and minimise reversing
- Speed humps and speed signage
- Signage with site facility traffic rules; and
- Security gate to only permit authorised access to site

6.2 Managing casual and contract heavy vehicle operators

Due to the casual and contract nature of heavy vehicle movements on site, Allied Pinnacle has developed facility rules which all truck operators must comply with.

These rules are posted on signage at the entrance to the site and monitored by site managers.

In addition, contract operators are managed as follows:

- the rules are provided to contract operators as work instructions in accordance with the Allied Mills General Transport Agreement (Section 6.3).
- all vehicles coming on to site must be registered and comply with relevant government regulations in relation to noise and emissions

6.3 Facility rules

In order for the site to operate safely and efficiently and minimise noise and exhaust emissions, the following rules for all vehicles are to be followed:

- adherence to the 10 km/h speed limit on-site unless otherwise signposted
- refrain from using engine braking unless necessary for safety
- when queuing, trucks shall turn off engines
- refrain from excessively accelerating and decelerating
- ensure loads are covered to satisfy all legal requirements
- weigh all loads before departing facility to ensure they do not exceed vehicle load capacities
- do not allow vehicles to idle excessively and follow all road rules within the site

7. Traffic monitoring strategy

7.1 Traffic monitoring

Drivers are responsible for knowing, understanding, and following the facility rules in addition to standard road rules that apply to their vehicles.

The site manager will monitor compliance to these rules on an ongoing basis and through quarterly site inspections for:

- speed compliance
- vehicle noise levels, and
- appropriate load coverage

Refer to Picton WHSE-Form-04 Implementation Checklist for the Traffic Management Plan (TMP)

7.2 Reporting of incidents, and complaints

All incidents and complaints will be entered into the Allied Pinnacle Incident Reporting Database as a complaint or incident.

Corrective actions will be managed through the Allied Pinnacle Incident Reporting Database and Section 5.6 of the OEMP.

Refer to WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work and Picton WHSE-006 Picton Operational Environment Management Plan

Related Documents

- **WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work**
- **Picton WHSE-006 Picton Operational Environment Management Plan**
- **Picton WHSE-Form-04 Implementation Checklist for the Traffic Management Plan (TMP)**

DOCUMENT APPROVAL and CHANGE HISTORY

APPROVAL			
Action	**Position Title**	**Name (s)**	**Date**
New Document Approval Version V01 to update to new format and Control under WHSE System	National WHSE Manager	Maria Hooker	20/7/2023