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Bringelly Brickworks Transport Management Plan

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GLOSSARY AND ABBREVIATIONS

CoA	Conditions of Approval for SSD_5684
CoR	Chain of Responsibility (RMS)
CSR	CSR Limited
DPI&E	Department of Planning Industry & Environment
EIS	Bringelly Brickworks Quarry Extension Environmental Impact Statement (Hyder Consulting, 5 September 2013)
EMS	Environmental Management Strategy
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
LGA	Local Government Area
LoS	Level of Service
NWP Act	<i>National Parks and Wildlife Act 1974</i>
RMS	NSW Roads & Maritime Services
RTS	Response to Submissions
Secretary, the	The Secretary of the DPI&E
SSD	State Significant Development
TMP	Transport Management Plan
WMS	Work method statements

Document Control

Version	Date	Description of Change
1	Dec 2019	Original approval after consultation
2	Dec 2020	Minor Changes only, format, layout and history update.
3	May 2021	Changes post audit contingency and reporting. Include latest truck management process, esp in lieu of Greendale Rd / Bringelly Rd intersection upgrade and recent traffic assessment.
4	Sep 2021	Post regulator consultation.

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1. INTRODUCTION

1.1 Context

This Transport Management Plan (TMP or Plan) forms part of the Environmental Management Strategy (EMS) for Bringelly Brickworks (the facility). The Plan has been prepared following the approval of the Bringelly Brickworks Extension Project (SSD_5684) on 3 March 2015 and Modification October 2016.

This TMP has been prepared to address the requirements of the Conditions of Approval (CoA), the mitigation measures listed in the *Bringelly Brickworks Quarry Extension Environmental Impact Statement* (EIS) (Hyder Consulting, 5 September 2013) and applicable legislation identified in this Plan.

1.2 Background

Bringelly Brickworks (the facility) is a clay/shale quarry and brick making facility located at 60 Greendale Road, Bringelly, on Lot 100 in DP 1203966 and comprises an area of approximately 385.55 hectares (refer Figure 1) in the Camden Local Government Area. The facility has been in operation since 1968, and in its original form it had the capacity to process approximately 51,500 tonnes of bricks per annum.

In 1991, Boral Bricks (NSW) Pty Limited undertook to upgrade the facility with new technology and increase production to ensure the continued economic viability of the site due to the age of the manufacturing plant and machinery. The Council of the Municipality of Camden, as the approving authority at the time, approved the Development Application on 13 September 1991 (Council ref. DA 91/1194). From 1991 until 2013, the Bringelly Brickworks facility operated under this approval, which permitted (among other things) quarry extraction up to 200,000 tonnes per annum, the receipt of up to 96,000 tonnes of supplementary materials and brick production up to 160,000 tonnes per annum.

In 2013, Boral Bricks Pty Limited (Boral) prepared an Environmental Impact Statement (EIS) to assess the environmental impacts of an increase in production at the facility and continued extraction of the quarry to meet the anticipated demand for its brick products ('Bringelly Brickworks Extension Project', Application No. SSD_5684). The project was determined to be State Significant Development (SSD) under Part 4, Division 4.1 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and Clause 8 State Environmental Planning Policy (State and Regional Development) 2011 (State and Regional Development SEPP).

The EIS was publicly exhibited from 6 November 2013 to 9 December 2013. The then Department of Planning & Environment (DPI&E) received 12 submissions during this period, including 11 from public authorities and 1 submission from the general public who objected to the project due to its potential impacts. While none of the government authorities objected to the project, most raised concerns about its potential impacts and/or made recommendations for managing these impacts.

Boral prepared and submitted an initial Response to Submissions (RTS) to the DPI&E in February 2014. However, following receipt of the RTS, DPI&E received further correspondence from 7 public authorities which necessitated further consultation between Boral, DPI&E and the relevant government authorities.

The additional consultation was resolved and in February 2015 DPI&E finalised their Environmental Assessment Report and the Bringelly Brickworks Extension Project was approved with conditions on 3 March 2015.

On 1 May 2015, CSR Limited (CSR) and Boral Limited (Boral) formally completed the establishment of a joint venture for operations located in New South Wales, Victoria, Queensland, South Australia, Tasmania and the ACT. Ownership of Bringelly Brickworks (including quarrying activities) was transferred to the joint venture Boral CSR Bricks Pty Ltd (BCB), trading as PGH Bricks & Pavers. PGH Bricks & Pavers (PGH) was the controlling entity of the facility and responsible for implementing the Environmental Management Strategy of the site. On 31 October 2016 CSR agreed to acquire Boral's

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interest in BCB, therefore resulting in CSR owning 100% of PGH. BCB no longer exists

Since Project Approval, the type of bricks demanded by the market have changed and Boral Bricks withdrew from the site. These two critical factors necessitated PGH to review its manufacturing requirements to ensure the most efficient use of all the resources available. To manufacture the bricks demanded by the market, the type, composition and quantity of the raw materials to be imported to Bringelly Brickworks was reconsidered because the type of raw materials required could not be solely extracted from the Bringelly quarry. PGH therefore applied to DPI&E to modify SSD_5684 under Section 96(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act), to provide for an increased raw material import limit to 321,000 tonnes per annum (referred to as MOD1). MOD1 was approved by DPI&E on 31 October 2016.

Bringelly Brick Works continued to operate under DA 91/1194, however approval for State Significant Development (SSD 5684) was issued in March 2015 for the extension of the quarry and to upgrade ancillary infrastructure.

Schedule 2, Condition 9 of SSD 5684 required PGH to surrender DA 91/1194 following commencement of development, as approved in SSD 5684. The SSD was triggered on 24 Feb 2020, and DA 91/1194 was surrendered to Camden Council.

In anticipation of the surrender of DA 91/1194, draft management plans were prepared in accordance with SSD 5684 and submitted to the Department of Planning and Environment (DPI&E) on 21 February 2017 for comment. Consultation regarding these plans continues as required and modified plans were submitted for approval by DPI&E in Dec 2019. They were subsequently approved in Dec 2019.

A traffic and transport assessment was completed as part of the EIS to assess potential traffic and transport impacts associated with the Bringelly Brickworks Extension Project. The assessment addressed the following requirements:

- Accurate predictions of the road traffic generated by the construction and operation of the Bringelly Brickworks Extension Project;
- An assessment of potential impacts on the safety and efficiency of the road network; and
- A detailed description of the measures that would be implemented to maintain and/or improve the capacity, efficiency and safety of the road networks in the surrounding area over the life of the Bringelly Brickworks Extension Project.

Modification 1 was granted October 2016 permitting an increased raw material importation limit of 321,000 tonnes per annum.

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2. PURPOSE AND OBJECTIVES

2.1 Purpose

The purpose of this TMP is to outline the measures PGH will implement to ensure compliance with the transport operating conditions of the CoA and to manage traffic to and from the site throughout the operational lifetime of the facility.

2.2 Objectives

The key objective of the TMP is to manage and minimise potential traffic and transport impacts on local road users and the community.

To achieve this objective, PGH will address the following issues:

- Manage traffic generation, particularly heavy vehicles, during construction and operation;
- Provide sufficient parking on-site for all development-related traffic;
- Contribute to road maintenance in accordance with the CoA;
- Keep the community informed of any traffic disruptions that would be caused by the facility;
- Ensure appropriate measures are implemented to address the relevant CoA outlined in **Table 1**
- and the management measures detailed in **Table 2**; and
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 9 of this TMP.

2.3 Targets

The following targets have been established for the management of traffic during the operational lifetime of the facility:

- Ensure full compliance with the relevant legislative requirements and CoA;
- Minimise traffic disruptions; and
- No traffic or transportation incidents.

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3. ENVIRONMENTAL REQUIREMENTS

3.1 Relevant Legislation and Guidelines

3.1.1 Legislation

Legislation relevant to traffic management includes:

- Environmental Planning and Assessment Act 1979 (EP&A Act);
- Roads Act 1993;
- Transport Administration Act 1988; and
- Australian Road Rules 2014.

3.1.2 Guidelines and standards

The main guidelines, specifications and policy documents relevant to this TMP include:

- RMS Traffic Control at Worksites Manual Version 4, June 2010; and
- Australian Standard 1742.3-2009 Traffic control devices for works on roads.

3.2 Minister's Conditions of approval

The CoA relevant to this TMP are listed in **Table 1**. A cross reference is also included to indicate where the conditions are addressed in this TMP or other environmental management documents.

Table 1 Conditions of Approval relevant to the TMP

Schedule and Condition Number	Condition of Project Approval	Location of where addressed in document
2)7)	The Applicant shall not: • Transport more than 263,500 tonnes of bricks from the site in a calendar year; • Receive more than 90 trucks to the site per day or more than 18 trucks per hour; and • Dispatch more than 90 trucks from the site per day or more than 18 trucks per hour.	Section 6 Section 9.2.2
2)19)	The Applicant shall pay Camden Council road maintenance contributions of \$0.0811 for every tonne of material transported to and from the site, indexed to CPI. Each payment must be: • paid to Council at the end of each calendar year; and • based on weighbridge records of all supplementary brick making materials transported to the site and bricks and spoil transported from the site. Note: If the parties are not able to agree on any aspect of the maintenance contributions, either party may refer the matter to the Secretary for resolution.	Sections 7.2.3 & 9.2.2
3)11)	The Applicant shall keep accurate records of the:	Section 9.2.2

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Schedule and Condition Number	Condition of Project Approval	Location of where addressed in document
	- Amount of bricks transported from the site (monthly and annually); and - Number of laden vehicle movements from the site (hourly, daily, weekly, monthly and annually); and Provide the Secretary with a summary of this information upon request.	
3)12)	The Applicant shall provide sufficient parking on-site for all development-related traffic, in accordance with the Camden Council's parking codes, to the satisfaction of the Secretary.	Section 8, Section 13
3)13)	The Applicant shall ensure that: - All development-related heavy vehicles enter and exit the site in a forward direction; - All laden vehicles entering or exiting the site have their loads covered (with the exception of vehicles carrying bricks); - All laden vehicles that have accessed the extraction and/or stockpile areas are cleaned of sand and other material that may fall on the road, before leaving the site; - All heavy vehicles exiting the site travel east of the site along Greendale Road to The Northern Road and/or Bringelly Road; - The dispatch of laden trucks is avoided during the peak drop-off and pick-up times at the Bringelly Public School to the greatest extent practicable, particularly prior to the upgrade of the Greendale Road/Bringelly Road intersection by RMS; and - No trucks queue at the entrance to the site before 6am.	Section 8
3)14)	Within 12 months of commencing the development under this consent, unless otherwise agreed with the Secretary, the Applicant shall design and construct the new site access road intersection with Greendale Road in accordance with applicable AUSTROADS standards, and to the satisfaction of Camden Council. (extension granted by DPIE)	Section 7.2.2
3)15)	The Applicant shall prepare and implement a Transport Management Plan for the project to the satisfaction of the Secretary. This plan must:	Section 8, Appendix A

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Schedule and Condition Number	Condition of Project Approval	Location of where addressed in document
	- be prepared in consultation with RMS, Camden Council, Liverpool City Council and Bringelly Public School, and be submitted to the Secretary for approval prior to the commencement of construction activities under this consent, unless the Secretary agrees otherwise; - Describe the measures that would be implemented to ensure compliance with the transport operating conditions under this consent, including specific measures to avoid dispatching laden trucks from the site during the peak drop-off and pick- up times at the Bringelly Public School; - Include a Code of Conduct for heavy vehicle drivers that addresses: - Travelling speeds; - Instructions to avoid grouping or convoying of trucks; - Procedures to ensure that drivers adhere to the designated haulage routes and the haulage hours permitted under this consent; - Instructions to drivers not to overtake each other on the haulage route, as far as practicable, and to maintain appropriate distances between vehicles; and - Instructions to drivers to be properly safety conscious and to strictly obey all traffic regulations, particularly in relation to school zones along Greendale Road; and - Describe the measures that would be put in place to ensure compliance with the drivers' Code of Conduct and include a program to monitor the effectiveness of the implementation of these measures.	

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4. CONSULTATION

As outlined in **Table 1**, this Plan must be prepared in consultation with TfNSW, Camden Council, Liverpool City Council and Bringelly Public School.

Accordingly, this Plan was provided to TfNSW (RMS), Camden Council, Liverpool City Council and Bringelly Public School for comment.

4.1 Camden Council

Email correspondence with Camden Council was undertaken due to their lack of access to the DPIE portal. Delays were encountered due to COVID 19 lockdown. Correspondence was undertaken through July and August 2021 (key items included in appendix) with agreed additions incorporated into the final document .

Camden council consultation was via many emails and documents. In summary: requested reference to construction parking being contained on site, trucks must not park in council reserves, and parking requirements to be assessed against other operations (Camden Council has no guidelines that suit development), Construction Traffic plan submission at time of construction.

4.2 TfNSW

Were contacted via the portal. TfNSW made no requests for changes. (response on portal and in appendix)

4.3 Liverpool City Council

Liverpool City Council (LCC) were contacted via the portal in July with no response and only responded via email (see response in appendix) after requested via external email requests.

Most items raised by LCC were in the current plan. Additional requests were agreed and incorporated.

4.4 Bringelly Public School

Response was received from Bringelly Public School (in appendix). No request for change

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5 EXISTING ENVIRONMENT

5.1 Road Network

The entrance to the facility is 60 Greendale Road, Bringelly. The facility is accessed via Greendale Road (rural road) which in turn intersects the main arterial road, The Northern Road (refer **Figure 1**).

Greendale Road is a two-way sealed rural road running west from The Northern Road up to the Sydney University Farms where the alignment then shifts northward towards Penrith. Bringelly Public School is located at the northwest corner of Wentworth Road and Greendale Road intersection. There is a 40 km/hr school zone during the prescribed hours along Greendale Road. Beyond the school zone and up to 350 metres west of the facility's access road, Greendale Road has a speed limit of 60 km/hr. Beyond this point Greendale Road has an 80 km/hr to the west. A boral concrete batching plant is located in the 60 km/hr zone, to the west of the PGH Bringelly access road.

The Northern Road is an arterial road that links Narellan in the south with Richmond in the north, passing through Penrith Local Government Area (LGA). It traverses predominantly rural areas, with the exception of stretches in Kingswood in Penrith LGA (Parker Street). The Northern Road was substantially upgraded between 2014 and 2019, removing its impact for local traffic, as was discussed as a major impact in the EIS of 2013 (Hyder)

Directly opposite the facility's access off Greendale Road is a local road (Medway Road) which provides access to some low-density residential properties on the northern side of Greendale Road. It is a two-way sealed road and signposted as a "No Through Road".

5.2 Traffic Flows

Traffic surveys (Hyder Consulting, 2013) formed part of the EIS. They indicated that Greendale Road carried approximately 1,500 vehicles per day. The morning peak hour was recorded to take place between 8:00AM to 9:00AM with an average weekday volume of 103 vehicles per hour and the peak direction is eastbound. The evening peak was 4:00PM to 6:00PM, with an average weekday volume of 130 vehicles per hour and the peak direction is westbound.

Traffic surveys (SKM, 2012) indicated that The Northern Road at Greendale Road intersection carried approximately 14,000 vehicles a day, of which 6% are heavy vehicles. Morning peak hour (7:00AM to 8:00AM) flows are 689 vehicles while evening peak (4:00PM to 5:00PM) flows are 779 vehicles.

To aid in understanding the difference in traffic movements post Northern Rd re alignment, Colston Budd Rogers & Kafes Pty Ltd undertook a review of traffic in may 2021. This concluded:

- The average daily traffic flow was 2,670 vehicles per day (two way);
- The peak hourly flows occurred between 8am and 9am in the morning (193 vehicles per hour, two way) and 3pm and 4pm in the afternoon (221 vehicles per hour, two-way); and
- 81% of traffic was light vehicles (cars), 14% medium vehicles (rigid trucks)
- and 4% heavy vehicles (articulated trucks).

The results of the intersection count (including pedestrian movements) are summarised below:

- Greendale Road carried some 245 to 365 vehicles per hour (two way) in the weekday morning and afternoon peak hours. Traffic flows were higher east of Wentworth Road;
- Wentworth Road carried some 50 to 90 vehicles per hour (two way) in the weekday morning and afternoon peak hours. Traffic flows were higher south of Greendale Road; and
- Pedestrian flows were low at less than 10 pedestrians per hour (two way) using the pedestrian crossings on the western and northern legs of the intersection.

It can be concluded that the traffic on Wentworth Rd (was Northern Rd) has reduced substantially (by over 99%). Greendale Rd traffic has increased, but overall the traffic at the Bringelly School intersection has reduced approximately 80%. In addition to this school drop off areas and bus stops have been moved to the much quieter Wentworth Rd.

Intersection Performance & Mid-block Operation

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The performance of the existing road network is largely dependent on the operating performance of the key intersections which are critical capacity control points on the road network.

The impact of the nearby intersection at Bringelly Public School (now Wentworth Rd / Greendale Road) has been significantly impacted in a positive way by the upgrade and subsequent relocation of The Northern Road. This has removed significant traffic from the intersection, and Wentworth Road (which was previously The Northern Road) is now a cul-de-sac, and no through road.

The criteria for evaluating the operational performance of intersections are provided by the RMS and were assessed in the EIS and subsequent review in June 2021, based on a qualitative measure (i.e. Level of Service), which is applied to each average delay band.

The Level of Service (LoS) is the industry standard used to measure the performance of intersection operation and is defined as the qualitative assessment of the quantitative effect of factors such as speed, traffic volume, geometric features, delays and freedom of movement.

The EIS determined that the intersection of The Northern Road with Greendale Road and Bringelly Road operated satisfactorily with a LoS of "B". A LoS "B" implies that the level of service for a particular signalised intersection is good with acceptable delays and spare capacity. The most recent study, undertaken in May and reported June 2021, by CBRK, after the Northern Rd re-alignment, assesses the intersection at LoS = "A"

With an Average Annual Daily Traffic volume of 2,670 vehicles per day, the level of service for Greendale Road is equivalent to LoS "A", which indicates that Greendale Road has spare capacity to accommodate additional traffic and is not presenting a traffic problem in the area

5.4 Public transport, cyclist and pedestrian facilities

There are currently no public transport services in the immediate vicinity of the site, but there is a bus stop that services several routes nearby at The Bringelly Public School. These bus route links Bringelly with Liverpool and other local communities.

This bus stop is ID 255613 in Wentworth Rd opposite Bringelly Public School. See **Fig 1** below

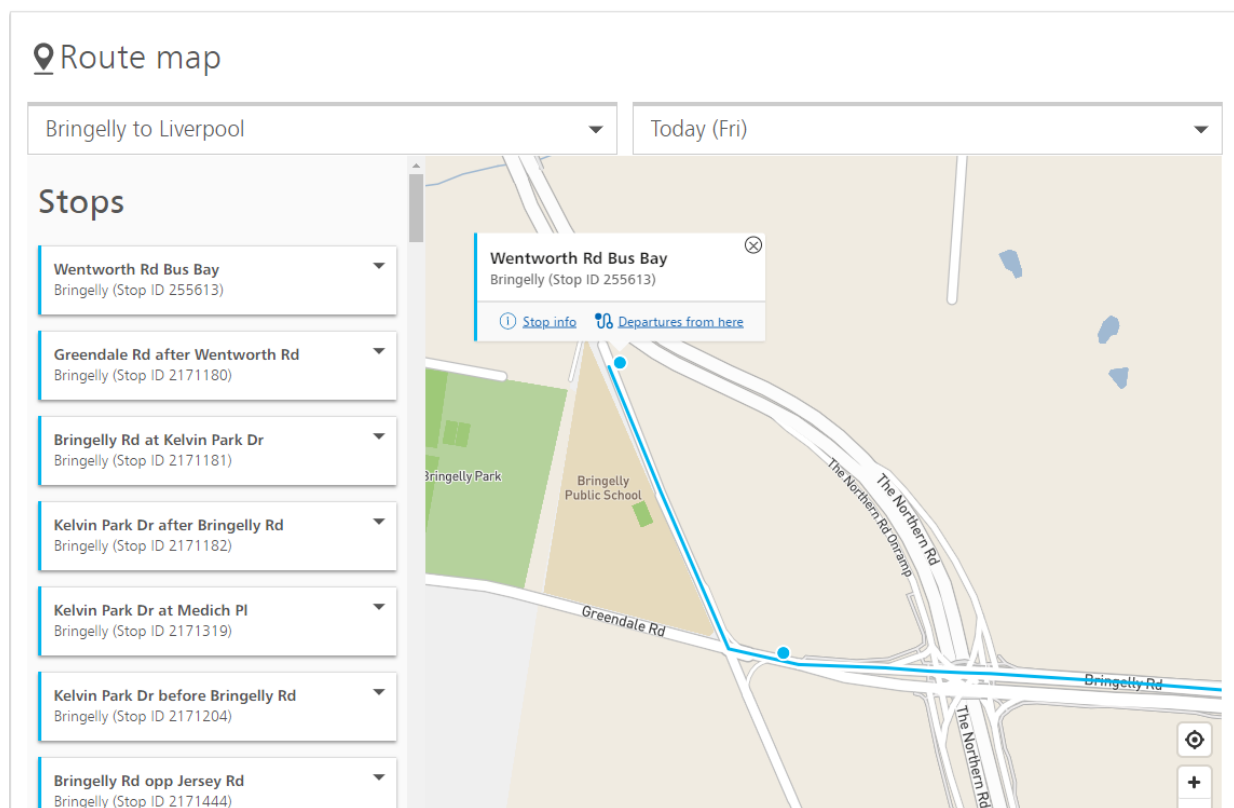


Figure 1 Bus stop in Wentworth Rd servicing several routes in and out of Bringelly.

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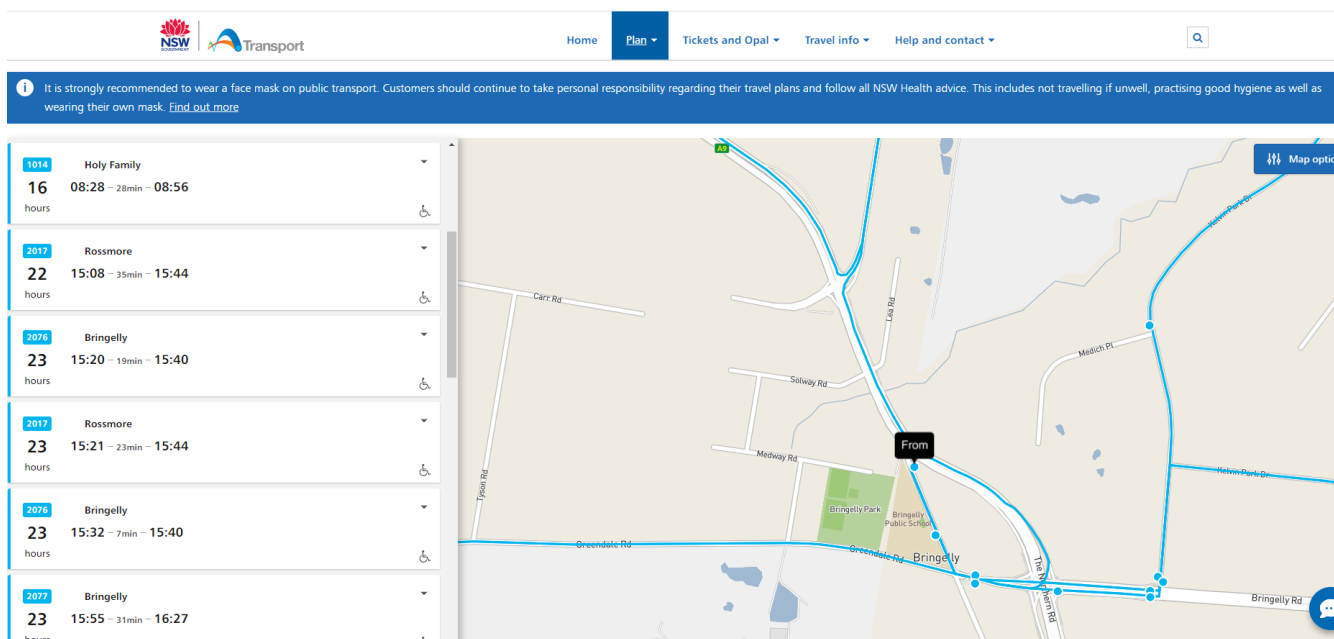
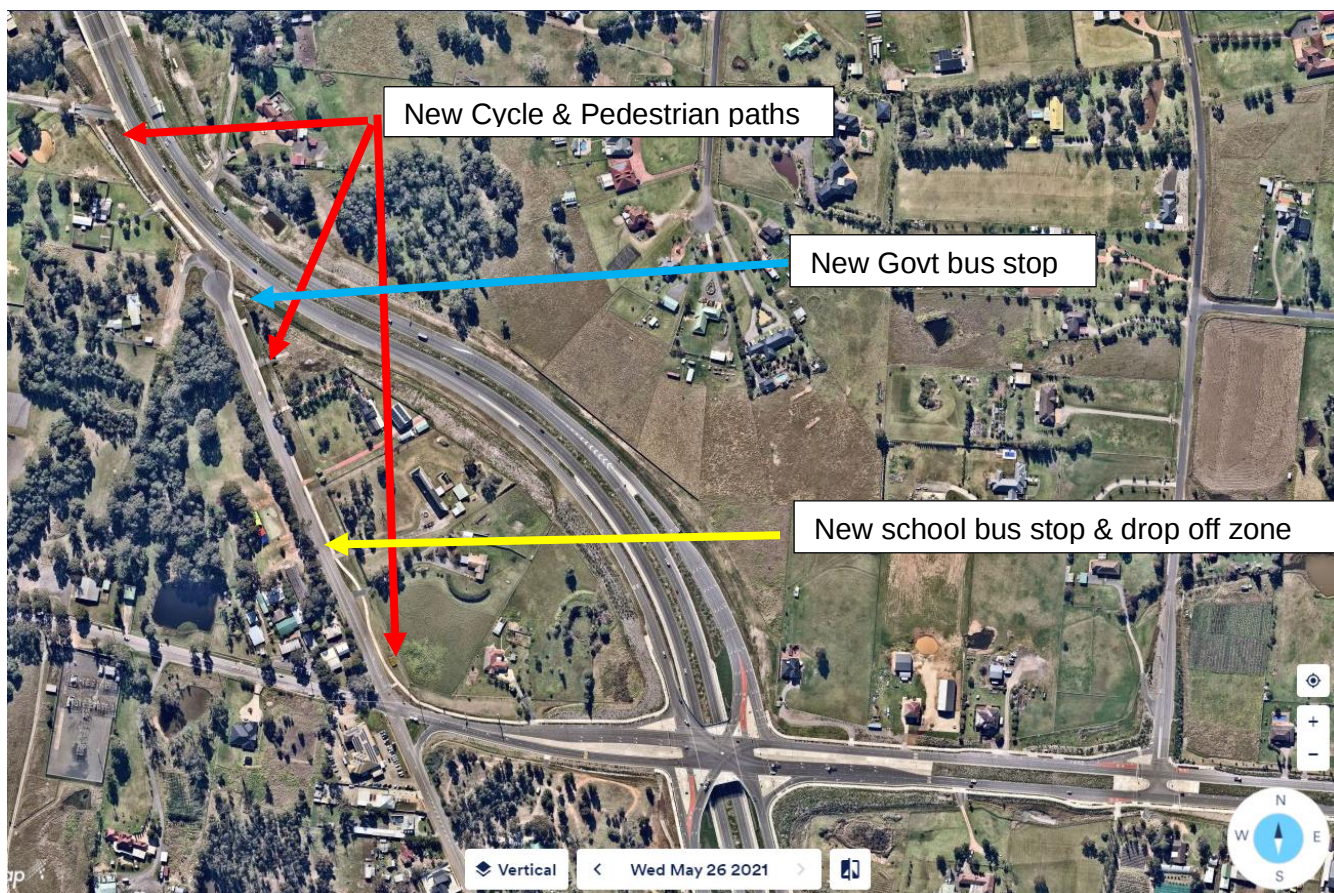


Figure 2 – Regular timetable available for the network of buses that stop near the site.

Dedicated pedestrian and cycle facilities have been installed at Wentworth Rd and Northern Rd. There is a pre existing pedestrian footpath on the northern side of Greendale Road running west from The Northern Road for approximately 320 metres. In the vicinity of Greendale Road, The Northern Road has a pre existing pedestrian footpath on the western side. (see Fig 3 below)



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Figure 3 - Pedestrian and Cycle ways have been installed in conjunction with the Northern Rd expansion and Northern Rd / Bringelly Rd intersection upgrade.

5.5 The Northern Road Upgrade

The upgrade to The Northern Road has been completed and traffic flow and congestion improved significantly.

Noise monitoring undertaken on site since the changes to the Northern Road have indicated lower than consented levels.

The Australian and NSW governments upgraded The Northern Road as part of the Western Sydney Infrastructure Plan, a 10- year , \$3.6 billion road investment program. The Northern Road Upgrade, about 35km in length, extends from The Old Northern Road, Narellan to Jamison Road, Penrith

Work on Stage 1 (most relevant to Greendale Rd performance) commenced in February 2016 and the remaining work impacting the site was completed during 2020.

This has had a substantial improvement on the performance of the intersection adjacent to Bringelly Public School, (now Greendale Rd / Wentworth Rd) as indicated in traffic review undertaken by CBRK and reported 8 June 2021.

5.6 Parking

This section has been included in accordance with CoA Schedule 3, Condition 12.

Whilst Camden Council has no specific rate for this type of land use, consideration of similar activities in the area resulted in the following parking assessment.

There are currently a minimum of 44 parking spaces on site. According to PGH staff, there are currently 27 day shift workers and 9 night shift workers. This allows for significant increase in staff if needed once the expanded Project commences.

According to the Camden Council's Development Control Plan (DCP) 2019, a Warehouse or Distribution Centre/Storage Premises requires 1 car parking space per 300m³ gross floor area. It should be noted that this category in the DCP is not specific to the Bringelly Project but has been used to respond to Camden Council issues raised in 2016 and 2021 correspondence. It is estimated that the useable floor area utilised by staff at Bringelly is approximately 11,000m² excluding non-pedestrian areas such as the kiln. This equates to approximately 37 carparks required on site; therefore, the parking space numbers are consistent with those required by Council.

All parking for construction workers will be contained on the development site.

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6. TRAFFIC GENERATION

Traffic generation for the facility is estimated on the basis of existing operations and the approved expansion. The vehicle movements anticipated as a result of an increase in brick production to 263,500tpa will consist of light vehicle movements (e.g. employee's travelling to and from work) and heavy vehicle movements (e.g. transporting raw materials and product dispatch).

6.1 Light Vehicle Movements

The bulk of light vehicle movements are employees attending their work shift.

The approved consent permits the brick production process to operate on a 24-hour basis.

The number of staff currently employed by the facility is 38. 24 of the employees worked on an 11-hour shift, four days on/off basis, 6:00AM to 5:00PM. Smaller shifts and maintenance teams do operate during the "night" hours, as demand dictates. Up to 26 employees are present at the facility at any one time.

When demand requires full 24hr production shifts to operate, an additional 34 employees could be working in the factory. This would bring the total employee base to 72. 56 of the employees could work on a 12-hour shift, four days on/off basis. Up to 44 employees could be present at the facility at any one time.

6.2 Heavy vehicle movements

The volume of trucks arriving and departing from the facility is attributed primarily to the delivery of raw materials/supplies and the dispatch of finished products. A small number of truck movements are attributed to heavy vehicles for maintenance, service and factory related delivery activities.

Consented vehicle movements (see Sch 2, Condition 7 - Table 1 above) are:

The Applicant shall not:

- Transport more than 263,500 tonnes of bricks from the site in a calendar year;
- Receive more than 90 trucks to the site per day or more than 18 trucks per hour; and
- Dispatch more than 90 trucks from the site per day or more than 18 trucks per hour

6.3 Construction

It is anticipated that the construction of the realigned site access and minor extensions to the brick making facility will be undertaken concurrently and take approximately 8 weeks in total.

During construction, additional light and heavy vehicle traffic will be temporarily experienced. Construction staff would comprise project management, various trades and general construction staff. A peak construction workforce is estimated to be approximately 10 employees, which would occur over a short period during the 8-week construction period. It is estimated that around four heavy vehicles a day would also be used over the construction period.

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7. ENVIRONMENTAL ASPECTS AND IMPACTS

7.1 Development Activities

Key aspects of the facility that could result in adverse impacts to traffic include (but are not limited to):

- Construction of the factory extension or realigned site access road;
- Delivery of raw materials/supplies;
- Employees attending work and shift changes; and
- Product dispatch and transportation.

7.2 Transport Impacts

7.2.1 Road Network Capacity

It is estimated that the approved expansion will attract an additional 123 vehicle trips per day consisting of 33 light vehicles and 90 heavy vehicles. This would increase the average daily traffic on Greendale Road (both directions) to roughly 1,631 vehicles per day with 16.1% heavy vehicle composition.

The increase in traffic would change the LoS for Greendale Road from LoS “A” to LoS “B”. In a rural context, LoS A and LoS B, are considered satisfactory.

Heavy vehicles departing the facility will continue to travel east along Greendale Road, and then north, south or east at the intersection with The Northern Road. There would be no significant change to the directional split of heavy vehicles at this intersection compared with existing operations.

Importantly no trucks from the PGH site would have the need to travel on the new Wentworth Rd adjacent to the school.

7.2.2 Site Access

Schedule 3, Condition 14 requires that an alternate access road be built to the site by Feb 2021, which is 12 months after commencement. (see table 1)

This has not been built as yet and the DPIE has agreed to delay this condition to allow PGH to further assess the requirement for this alternate entry.

If the existing site access road is to be realigned, it would be located approximately 140m to the east. The realignment would accommodate a dedicated 60m left turn lane at the approved vehicle access point on the westbound lane of Greendale Road. An assessment of sight distance requirements for the approved realignment was undertaken in the EIS with reference to Austroads Guide to Road Design, Part 3 – Geometric Design (November 2009). For a 60km/hr zone, the required minimum sight distance is 91m. To accommodate this sighting distance, it will require the removal of some vegetation on the southern side of Greendale Road, east of the approved access point.

7.2.3 Road Maintenance Contributions

The boundary between Camden and Liverpool LGA's falls on the centreline of Greendale Road, and all road maintenance contributions are paid to Camden Council (in line with an agreement between the councils).

Previously, BCB paid road maintenance contributions to Camden Council for every tonne of product transported to and from the site in accordance with Council's *Section 94 Contributions Plan No.7 – Extractive Industry* (CP7), which was developed in 1993. The contributions under CP7 were made at a base rate of \$0.0935 indexed against the RMS Road Cost Index.

However, in accordance with the CoA, PGH will henceforth pay Camden Council road maintenance contributions of \$0.0811 for every tonne of material transported to and from the site, indexed to the

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Consumer Price Index. Each payment will be:

- paid to Council at the end of each calendar year; and
- based on weighbridge records of all supplementary brick making materials transported to the site and bricks and spoil transported from the site.

If PGH and Camden Council are not able to agree on any aspect of the maintenance contributions, either party may refer the matter to the Secretary for resolution.

PGH will gather this information from SAP records that details weights and dates of despatch for FG Brick trucks.

Other materials used in brick manufacture will be gathered via SAP.

Raw Material truck weights for deliveries will be via invoiced amounts (weighed at departing site)

Weighbridge dockets were deemed not reliable enough, as all deliveries did not necessarily pass over the weighbridge (weighed elsewhere)

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8. ENVIRONMENTAL MANAGEMENT MEASURES

Specific traffic and transport management measures identified in the EIS and CoA have been interpreted and generally reproduced in Table 2. The management measures identified in this table are to be implemented to mitigate or manage impacts identified in Section 8.2. Where additional resources will be required to implement a management measure, these have been identified in the last column.

Table 2 *Environmental Management Measures*

ID	Measure / Requirement	Source	When to implement	Responsibility	Additional Resources Needed
T1.	Vegetation on the southern side of Greendale Road, east of the approved access point, will be removed to meet the sight distance requirements as required by AUSTROADS standards.	Section 7.4.4 EIS	Construction of access road	Plant Manager	
T2.	Personnel operating trucks and vehicles to and from the facility would be required to undertake a site-specific health and safety induction specifying operating hours, speed limits along Greendale Road, safe access and egress, and the avoidance of the morning and afternoon peak periods near Bringelly Public School.	Section 7.4.4 EIS	Operation	Plant Manager	Site Induction, Drivers' Code of Conduct
T3.	A heavy vehicle protocol would be developed for the facility and distributed to relevant staff and contractors during induction procedures. The protocol would deal with such issues as timing of vehicle movements, idling of vehicles, speed limits on Greendale Road and parking.	Section 7.4.4 EIS	Operation	Plant Manager	Drivers' Code of Conduct
T4.	Deliveries would be scheduled on larger capacity 'truck and trailer' vehicles rather than 'truck only' vehicles where possible* to minimise truck movements. * Consumer demand has driven smaller vehicles for smaller lots and streets.	Section 7.4.4 EIS	Operation	Plant Manager	
T5.	Where non-routine vehicle movements are required, such as for the transport of oversized loads, within the confines of fatigue management and scheduling, PGH will undertake these tasks outside of normal working hours and/or the peak morning and afternoon periods.	Section 7.4.4 EIS	Operation	Plant Manager	

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ID	Measure / Requirement	Source	When to implement	Responsibility	Additional Resources Needed
T6.	PGH trucks servicing the site will be fitted with speed monitoring systems via GPS tracking software.	Section 7.4.4 EIS	Operation	Plant Manager	
T7.	All development-related heavy vehicles must enter and exit the site in a forward direction.	COA, Schedule 3, 13(a)	All times	Plant Manager	Drivers' Code of Conduct
T8.	All laden vehicles entering or exiting the facility must cover their loads (with the exception of vehicles carrying bricks).	COA, Schedule 3, 13(b)	All times	Plant Manager	Site Induction, Drivers' Code of Conduct
T9.	All laden vehicles that have accessed the extraction and/or stockpile areas are to be cleaned of sand and other material that may fall on the road, before leaving the facility.	COA, Schedule 3, 13©	Operation	Plant Manager	Site Induction, Drivers' Code of Conduct
T10.	All heavy vehicles exiting the facility are to travel east from the facility along Greendale Road to The Northern Road and/or Bringelly Road.	COA, Schedule 3, 13(d)	All times	Plant Manager	Drivers' Code of Conduct
T11.	The dispatch of laden trucks is to be avoided during the peak drop-off and pick-up times at the Bringelly Public School within the confines of fatigue management and scheduling, particularly prior to the upgrade of the Greendale Road/Bringelly Road intersection by RMS. [now upgraded – significant positive impact on congestion]	COA, Schedule 3, 13(e)	Operation	Plant Manager	Drivers' Code of Conduct
T12.	Trucks are not to queue on Greendale Road at the entrance to the facility before 6:00AM.	COA, Schedule 3, 13(f)	All times	Plant Manager	Drivers' Code of Conduct
T13.	Sufficient parking is to be provided on-site for all development-related traffic, in accordance with the Camden Council's parking codes.	COA, Schedule 3, 12	All times	Plant Manager	

BRINGELLY BRICKWORKS AND QUARRY EXPANSION - AIR QUALITY MANAGEMENT PLAN

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9. COMPLIANCE MANAGEMENT

9.1 Monitoring and Inspections During Construction

Should traffic control be required during construction, the requirements to monitor and inspect traffic control is stipulated in Section 6 in the RMS Traffic Control at Worksites Manual and Australian Standard 1742.3 Traffic control devices for works on roads. These guidelines and standards are applicable for works being undertaken on public roads.

A monitoring and inspection regime of traffic control measures, should they be required during construction, is proposed in **Table 3**.

If required, a Traffic Control plan will be submitted to Camden and Liverpool City councils prior to the related construction works being undertaken.

Table 3 *Monitoring and inspection requirement relevant to traffic controls during construction*

Inspection	Frequency	Action	Reporting	Responsibility
Pre-start and pre-closedown	Daily	Before works start, check approved Traffic Control Plans, Road Occupancy Licence and Speed Zone Authorisations are onsite	Pre-start Brief	Construction Contractor
Short term traffic control inspections (day and night)	Weekly	Undertaken in accordance with Australian Standard 1742.3 using the drive through video method	Video recording or other	Construction Contractor
Long term traffic control inspections (day and night)	Fortnightly	Undertaken in accordance with Australian Standard 1742.3 using the drive through video method	Video recording or other	Construction Contractor

9.2 Monitoring and Inspections During Operations

9.2.1 Implementation of environmental management measures

Monthly inspections and daily visual observations by the Plant Manager (or delegate) of on-site traffic conditions, vehicle movements and implementation of the Driver's Code of Conduct will occur throughout the operational lifetime of the facility, in accordance with the EMS.

9.2.2 Product transportation monitoring and control system

A monitoring system has been developed that allows monitoring of all relevant truck arrivals and departures on an hourly and daily basis to ensure that consented traffic allowances are not exceeded in compliance with the transportation limits stipulated in CoA Schedule 2, Condition 7.

Controls prevent trucks entering the site (quarry and brick yard) for delivery or loading after the daily or hourly count is reached.

Once the count on the hour is reached, trucks will be delayed from entering until the hour has passed. Once the daily limit is reached, trucks will be turned away in the safest manner, with regard to not creating further congestion or truck movements. Trucks will not be able to stay on site (outside site's

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capacity to hold trucks) or **Council's road reserve area** and will need to return the next day.

SAP & invoicing information will be utilised to quantify the road maintenance contribution to be paid to Camden Council, as described in Section 7.2.3. Weighbridge records are not complete in every aspect to utilize in this regard.

SAP data on transport of finished goods will be utilized to ensure that the limit of 263,500 tonnes is not exceeded on an annual basis. This is unlikely unless planned transport exceed the plant capacity. Should the demand indicate that the plant will be at maximum capacity, then special attention will be given to these despatch tonnes, in conjunction with daily vehicle numbers.

Within the confines of fatigue management and scheduling, dispatch and arrivals during peak pick up/ drop off times at Bringelly Public School will be minimised and avoided. NSW public school speed zone operate during the following hours on designated school days (**Table 4**).

Table 4 NSW Public School Zone Operating Hours

School	Morning	Afternoon
Primary School	08:00 - 09:30	14:30 – 16:00

Since the relocation and upgrade of The Northern Road, traffic congestion has improved significantly at Bringelly Public School.

The drop off zone has been relocated to Wentworth Rd, on which through traffic has been removed due to cul-de-sac, which further reduces the risk of pedestrians, and in a similar manner, the school bus stop is also in Wentworth Rd. (see Fig 3 above)

In addition to intervention by the Bringelly yard despatcher, the normal cycle of daily brick deliveries prevents excessive truck despatches during school pick up & drop off times. (most trucks are out on distant sites completing delivery at these times)

9.3 Training

All employees and contractors driving heavy vehicles to or from the facility for construction or operational purposes, will undergo site induction and Driver's Code of Conduct training, which will cover issues relating to traffic management, including:

- Existence and requirements of this Plan, particularly those traffic and transport management measures outlined in **Table 2**;
- Relevant legislation;
- Bringelly Brickworks operational hours and delivery times;
- External and internal speed limits;
- Location of sensitive receivers; and
- Complaints reporting.

Further details regarding staff induction and training are outlined in the Bringelly Brickworks Environmental Management Strategy (EMS).

9.4 Auditing and Reporting

Audits (both internal and external) and reporting will be undertaken to assess the effectiveness of traffic and transport controls, compliance with this TMP, CoA and other relevant approvals, licenses and guidelines. Audit requirements are detailed in Section 6.3 of the EMS.

A Noise Auditing Program will be utilised annually in conjunction with the Noise Management Plan.

9.5 Drivers' Code of Conduct

A Drivers' Code of Conduct has been developed, see *Appendix B* to set driver behaviour controls to

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minimise impacts on road users and the surrounding community (especially on Greendale Rd in the vicinity of Bringelly Public School). Clauses will be entered in conditions of employment, or in contracts, that drivers must adhere to the Drivers Code of Conduct as new contracts are drafted or renewed.

These conditions will be monitored by observing drivers' behaviour and compliance with the Code of Conduct will be assessed randomly during a monthly safety walk or visual observation undertaken by the Plant Manager (or delegates). Breaches of the Code of Conduct will be addressed using the following flow chart as included in the Code of Conduct: (Fig 4)

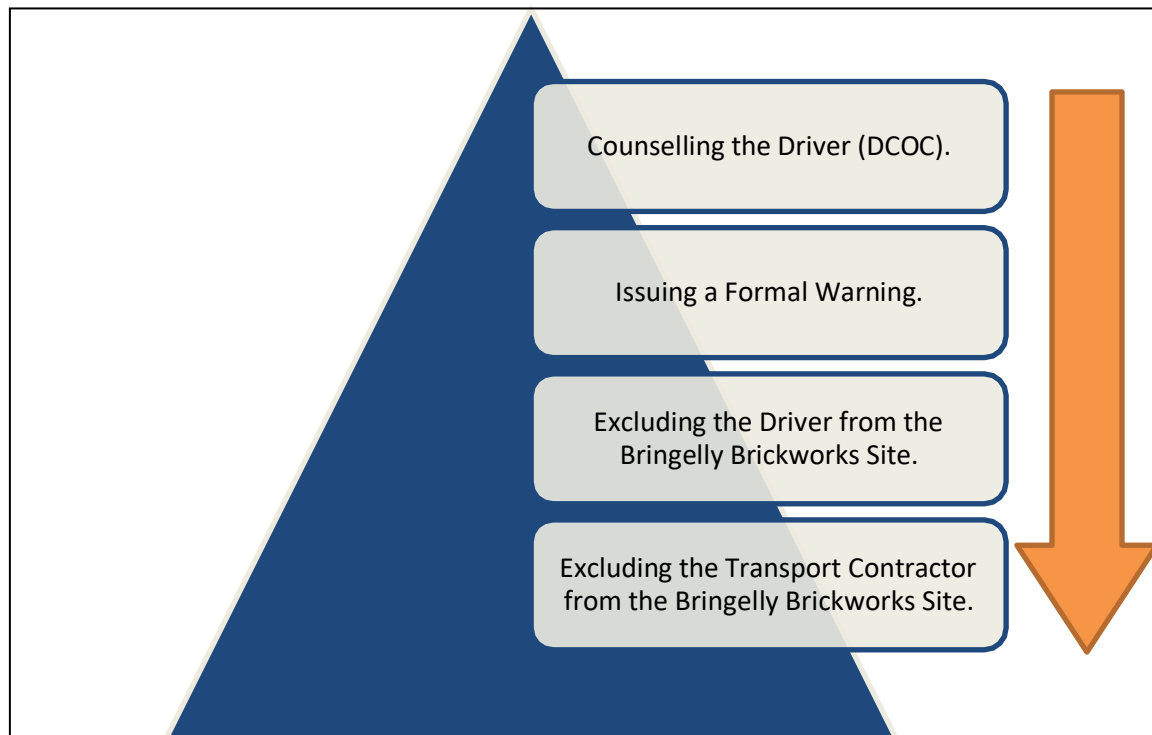


Figure 4 *Hierarchy of Disciplinary Actions to be taken by PGH*

9.6 Contingency Plans

Should an exceedance of any consent condition occur, immediate actions will be put in to place to mitigate or prevent any material harm to the environment.

The key measure of concern here is the management of truck numbers entering and departing site.

Protocols around the management of this condition are outlined above in 9.2.2.

Should other exceedances be discovered, they will be rectified immediately and corrective actions put in place to ensure that the risk of future transgressions are minimized.

9.7 Reporting of Non Compliance and Incidents

PGH will report and manage all incidents and non compliances in accordance with Section 8 of the EMS. Depending on the nature of the incident or non compliance, appropriate reporting will be undertaken.

All breaches of consent conditions will be reported to DPIE immediately and a detailed report submitted within 7 days Schedule 5, Condition 7.

For non compliances / incidents relating to council, EPA or other authority reporting will be undertaken as required.

Where non compliances relate to a receiver or neighbour, these persons will be advised and informed in corrective actions to be undertaken,

Incidents and non compliances will be presented in the CCC meeting.

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9.8 Complaints

Complaints will be managed as per Section 8.2 of the Environmental Management Strategy and as outlined in the Drivers Code of Conduct.

A 24hr phone line is available and any complaints received by the site will be displayed on the external website.

Complaints will be logged and reported to the CCC meetings and in the Annual Review. CCC meeting minutes will be available on the website (and can be emailed to council on request)

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10. REVIEW AND IMPROVEMENT

10.1 Continuous Improvement

Continuous improvement of this TMP will be achieved in accordance with Section 10 of the EMS, through the ongoing evaluation of traffic and transport management performance against traffic and transport policies, objectives and targets.

The continuous improvement process is designed to:

- Identify areas of opportunity for improvement of traffic and transport management and performance;
- Determine the cause or causes of non-conformances and deficiencies;
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies;
- Verify the effectiveness of the corrective and preventative actions;
- Document any changes in procedures resulting from process improvement; and
- Make comparisons with objectives and targets.

10.2 TMP Update and Amendment

The processes described in Sections 6 and 10 of the EMS may result in the need to update or revise this TMP.

The approval of updates or revisions to the TMP will need to be considered in accordance with Section 11.2 of the EMS.

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APPENDIX A CORRESPONDANCE ON MANAGEMENT PLAN FROM AUTHORITIES

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Camden Council (Final) Response

RE: Contact for Consultation on Traffic Management Plan



Sophak Eng <Sophak.Eng@camden.nsw.gov.au>

To: Travers, Michael

You forwarded this message on 25/08/2021 5:50 PM.

Enterprise Vault

Reply Reply All Forward

Mon 23/08/2021 12:40 PM

Get more add-ins

Hi Michael

We have sought clarification from our team and can advise that we are happy with your original wording. The paragraph now reads

Within the confines of fatigue management and scheduling, dispatch and arrivals during peak pick up/drop off times at Bringelly Public School will be avoided. NSW public school speed zone operate during the following hours on designated school days (**Table 4**).

In regard to your question “where will turned away trucks go?” – this will be away from site and back to their destination. They will not be able to stay on site (outside our capacity to hold trucks) or Council’s road reserve area and will need to return the next day. Is this answering your question satisfactorily?

Yes I am happy with this statement but can we just add a sentence as shown in red above please.

Regards

Sophak Eng
Senior Traffic Engineer



70 Central Avenue, Oran Park, 2570
(02) 4645 5026

www.camden.nsw.gov.au

PO Box 183, Camden NSW 2570
Sophak.Eng@camden.nsw.gov.au



INNOVATION



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COMMITMENT



SAFETY

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TfNSW Response



Major Projects

Bringelly Quarry/Brickworks

Lodge

Post Approval (SSD-5684-PA-14)

TRANSPORT FOR NSW ([PAE-24985960](#))

Status

Closed

Due Date

Friday, 13 August 2021

Notes:

Greetings,

TfNSW has assessed the Transport Management Plan provided in support of Post DA - 14, and has no further comment. Should you have any questions, please do not hesitate to contact development.sydney@transport.nsw.gov.au. Thank you for your consideration in this matter.



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Liverpool City Council Response



Our Ref: SSD-5684
Contact: Charles Wiafe
Ph: 8711 7542
Date: 23 August 2021

Michael Travers
Pacific Planning

Email: mtravers@csr.com.au

Dear Michael,

Re: Bringelly Brickworks – Draft Transport Management Plan

I refer to the submitted Draft Bringelly Brickworks Transport Management Plan (TMP) (Ref. BRK-BG-3.10.7-P10 Version 3) and note that the plan has been submitted to comply with Condition No. 15 of Development Consent for Bringelly Bricks (SSD 5684).

Council has reviewed the TMP and request that the plan is to be revised to incorporate or address the following comments:

1. Haulage Tonnage

Council notes and agrees that Brickworks operation is to:

- (a) Transport no more than 263,500 tonnes of bricks from the site in a calendar year;
- (b) Receive or dispatch more than 90 truck movements to the site per day or more than 18 trucks per hour

2. As indicated the development consent condition trucks movement along the section of Greendale Road fronting in Bringelly Public School, is to be minimised and avoided as much as possible, during the peak drop-off and pick-up times at the school, currently approximately 8:30-9:15 am and 2:30-3:30pm.

The school is to be consulted to confirm the peak drop-off and pick-up times at the school and for arrangement to be implemented to avoid truck movements during these times.

3. The plan is to specify a range of truck movements per hour, during the peak drop-off and pick-up times and outline arrangement that would be implemented to maintain road safety in front of the school to the satisfaction of Liverpool and Camden Councils, in consultation with the School Principal.

4. A Drivers' Code of Conduct is to be implemented to ensure safe driving behaviour on the local road network close to the Brickworks, particularly along the section of Greendale Road fronting the section of the public school, and travel at the applicable school zone speed limit.

5. All the construction vehicles shall enter and exit the site in a forward direction.

6. Council supports the establishment and regular meetings of the Brickworks Community Consultative Committee.

A copy of the Consultative Committee meeting minute is to be emailed to Council after each meeting. This is to ensure that road safety concerns due to operation of the Brickworks, on



Customer Service Centre Ground floor, 33 Moore Street, Liverpool NSW 2170
All correspondence to Locked Bag 7064 Liverpool BC NSW 1871
Call Centre 1300 36 2170 Email loc@liverpool.nsw.gov.au
Web www.liverpool.nsw.gov.au NRS 13 36 77 ABN 84 181 182 471

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the local network close to the Brickworks, can be assessed and if required addressed by the Brickworks at no cost to Council.

7. Parking for all construction workers should be accommodated within the development site.

Should you require further clarification, please contact me or via email on Wiafec@liverpool.nsw.gov.au.

Yours sincerely

Charles Wiafe
Service Manager Transport Management

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APPENDIX B PGH DRIVER CODE OF CONDUCT