

Our Ref: 600330  
Contact: Thomas (Tom) Yang

22 November 2016

Attention: Tracy Davey

Dear Tracy,

**RE: JOE WHITE MALTINGS (JWM) – MODIFICATION 4, RESPONSE TO REQUEST FOR INFORMATION**

I refer to the proposed Joe White Maltings located at 111 Stonny Batter Road in Minto (MP 08\_0157) and the subsequent comments in relation to traffic matters received from Campbelltown Council in a letter dated 27 September 2016 and NSW Environmental Protection Agency in a letter dated 22 September 2016.

Cardno has now had the opportunity to review the comments and prepare a response with additional information where required. The comments have been reproduced below with Cardno's response provided immediately thereafter.

**Campbelltown City Council – Traffic Comments, 27 September 2016**

*'Council agrees with RMS comments regarding traffic modelling and also requests that SIDRA data files be made available for assessment.'*

Noted, SIDRA files will be provided to both the RMS and Campbelltown City Council.

*'An assessment of impacts that the increase in heavy vehicles travelling to and from the site would have on Council's road pavement assets in the long term. This includes Stonny Batter Road and depending on desired access to the Hume Motorway could also include Ben Lomond Road, Rose Payten Drive and Blaxland Road.'*

*The Assessment should include a thorough discussion on the impacts that an increase in equivalent standard axle loadings will have on pavements proposed for use by trucks associated with the development. This discussion should include a consideration of the associated increase in dynamic loads exerted by trucks being the continual loading and unloading actions of trucks through their respective suspension systems and tyres when moving along the various roads at speed, and the consequential reduction in the design life of the pavement due to the impacts of dynamic loading of those pavements.'*

*This of course should be done after appropriate truck type has been established in accordance with the 45 tonnes per truck assumption mentioned earlier or alternate vehicle type(s) should it be determined that not every truck will be carrying this payload.'*

Prior to any detailed pavement assessment, the increase in truck movements needs to be considered in context with the existing volume of traffic that travel along these roads.

Based on the peak hour traffic volumes collected in 2016 as part of the submitted traffic study, the daily traffic volumes can be estimated by applying a peak-to-daily ratio of 7%

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in accordance with *Roads and Maritime's Traffic Modelling Guidelines, Version 1.0, Feb 2013*.

Furthermore, the comparison has adopted the revised truck intake numbers based on John White Malting's operational data between 29 June 2016 to 13 October 2016 in accordance with Roads and Maritime's requirement.

The revised truck intake estimate suggests the site can be expected to receive 35 trucks between 6:00am to 2:00pm for 26% of the time, and 8 trucks between 2:00pm to 6:00pm which is based on previous assumptions. Accordingly, only 26% of the time the site will expect to receive 43 truck intakes between 6:00am to 6:00pm on a typical work day.

The below comparison in **Table 1** has been set out to compare the additional 43 truck intakes generated from the proposed modification and the existing traffic volumes recorded on the road network.

**Table 1 Traffic Volume Comparison**

Location	Daily Traffic Volumes		
	Existing	Additional Trucks	% Increase
Campbelltown Rd north of Rose Payten Dr	63,886	22	0.03%
Campbelltown Rd south of Rose Payten Dr	49,957	22	0.04%
Rose Payten Dr between Campbelltown Rd and Airds Rd	20,500	65	0.32%
Airds Rd north of Rose Payten Dr	7,457	0	0.00%
Airds Rd south of Rose Payten Dr	8,800	0	0.00%
Rose Payten Dr between Airds Rd and Pembroke Rd	29,714	65	0.22%
Pembroke Rd southwest of Rose Payten Dr	14,829	0	0.00%
Smiths Creek Bypass east of Pembroke Rd	22,329	0	0.00%
Pembroke Rd between Rose Payten Dr and Stonny Creek Rd	23,043	65	0.28%
Stonny Batter Rd west of Pembroke Rd	3,214	86	2.68%
Pembroke Rd north of Stonny Batter Rd	15,800	22	0.14%

The above comparison shows the increase in traffic volumes on a daily basis is negligible along all adjoining road networks, where 90% of the road sections will experience an increase in traffic less than 0.1% with the exception of Stonny Batter Road which will experience a nominal increase in traffic in the order of 2.68%.

It is also pertinent to note in this regard that the site will not receive any truck intakes between the hours of 6:00am to 2:00pm for 74% of the time.

On the above basis, the level of increase in traffic volumes along the adjoining road network is negligible as a result of the proposed modification, and given the fact that these roads would have needed to be designed to service the industrial land uses in the area, Cardno considers there are no warrants for a detailed pavement analysis.

**NSW Environmental Protection Agency – Traffic Comments, 22 September 2016**

*'6. The existing project approval required an Operational Traffic Management Plan. If approved, this plan should also include, but not limited to, details of:*

- a. Driver traffic awareness to minimise noise, particularly from reversing alarms and compression braking*
- b. A regular Truck Noise Auditing Program (including testing and reporting requirements)*
- c. Identify, consider and implement feasible and reasonable management strategies to achieve best-practice noise and air emissions standards for vehicle movements associated with the Development. Diesel exhaust emissions are a major source of fine particle pollution. Where feasible vehicle servicing the JWM premises should be fitted with best available diesel control technology.'*

An existing Operational Traffic Management Plan (OTMP) is already in place for JWM which was previously prepared by Cardno in June 2012 (attached at the end of this letter) with the objectives of:

- > Maximise safety for internal and external users of the Malting plant associated with the amended proposed truck movements.
- > Manage the operational arrival and departure as well as onsite circulation of truck movements
- > Manage the movement of trucks on the road network surrounding the site.

On the above basis, the previously prepared OTMP remains largely valid on the basis that the modification proposal will not alter the site's existing operation and the document is considered to adequately address NSW EPA comments. Furthermore, this OTMP document will be updated upon approval of the modification proposal to ensure all information in that document is up to date.

I trust the above advice satisfies the requirements discussed with Campbelltown City Council. Should you have any questions or require any further information, please do not hesitate to contact me on (02) 9496 7700.

Yours faithfully,



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For **Cardno Traffic and Transport**

# Minto Joe White Malting Plant

## Operational Traffic Management Plan



Prepared for Joe White  
Malting's Pty Ltd  
June 2012

## Document Information

Prepared for	Joe White Malting's Pty Ltd
Project Name	Minto Joe White Malting Plant Operational Traffic Management Plan
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## Document Control

Version	Date	Author	Author Initials	Reviewer	Reviewer Initials
1 (DRAFT)	June 2012	Duncan Tjin	DST	Ray Cook	RJC
2 (FINAL)	June 2012	Duncan Tjin	DST	Ray Cook	RJC

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# 1 Introduction

## 1.1 Background

Joe White Malting's Pty Ltd (JWM) has commissioned Cardno to prepare an Operational Traffic Management Plan (Operational TMP) to satisfy the requirements of condition 19 of the modified Project Approval 08\_0157 issued on 20 April 2012 which required the modified TMP.

This Operational TMP is based upon and updates the existing Traffic Management Plan for the Malting Plant to reflect increased truck movements associated with the amended proposal to import a proportion of raw materials and export a proportion of malt via the road network.

## 1.2 Key objectives

The key objectives of the Operational Traffic Management Plan are to:

- > Maximise safety for internal and external users of the Malting plant associated with the amended proposed truck movements.
- > Manage the operational arrival and departure as well as onsite circulation of truck movements.
- > Manage the movement of trucks on the road network surrounding the site.

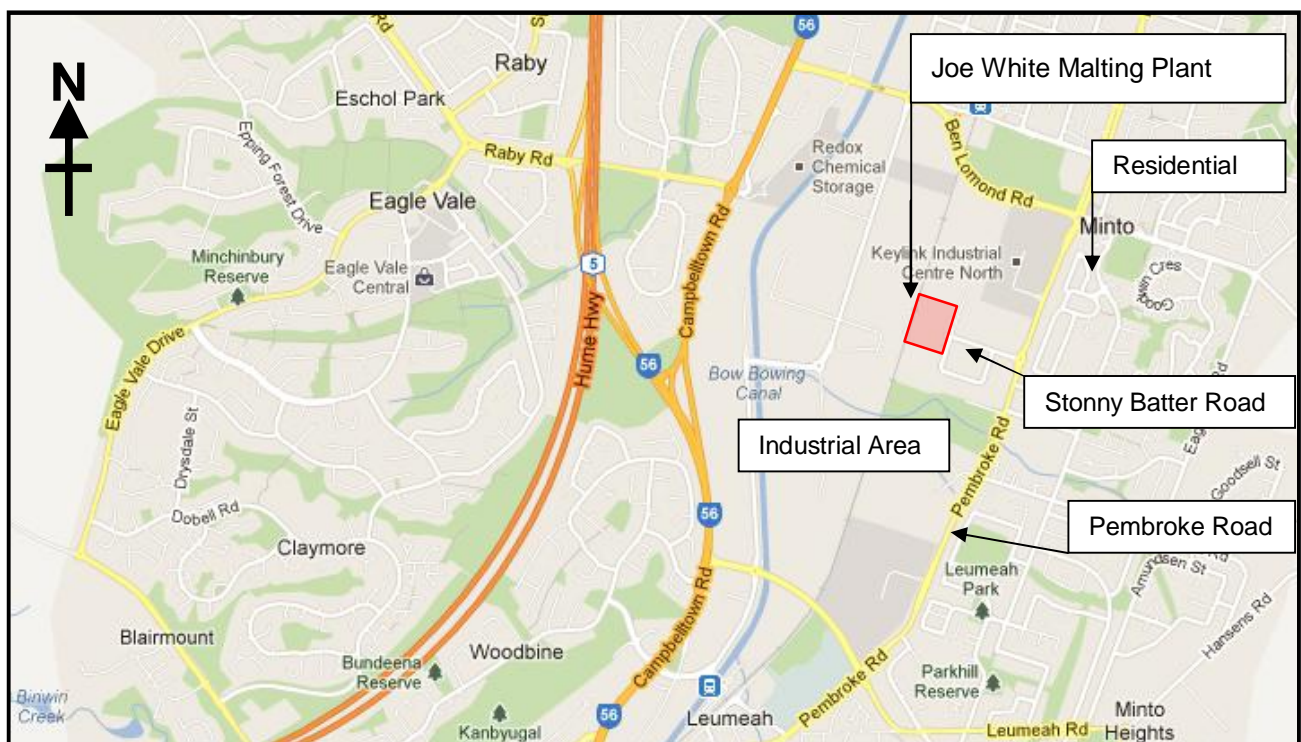
## 1.3 Study Area

The Joe White Malting Plant is located at 11 Stonny Batter Road, Minto, within the Minto Industrial Area and is bound by Pembroke Road to the east, Main Southern Railway line to the west and Ben Lomond Road to the north.

The site is surrounded by light manufacturing, warehousing and other allied industrial land uses, including a pharmaceuticals manufacturer, steel and metal fabricators and an intermodal shipping terminal. The nearest residential area is located approximately 400m to the east of the site.

**Figure 1** illustrates the location of the Minto Malting Plant and identifies the surrounding land uses and road network included within the Study Area.

**Figure 1 Joe White Malting Plant Study Area**



Cardno prepared a *Traffic Impact Assessment Addendum* report for the modified development detailing the impact of the associated additional truck movements on the surrounding road network. The addendum report considered traffic movements in the vicinity of the site as well as internal circulation and queuing. The report concluded that impacts to the road network will be minimal due to the scale of background traffic demand from the surrounding industrial area.

## **1.4 Reference documents**

The documents referenced within the Operational Traffic Management Plan are listed below:

- > Department of Planning and Infrastructure Assessment Report, *Assessment Report*, 20 April 2012.
- > Department of Planning and Infrastructure, *Notice of Modification*, 20 April 2012.
- > Cardno, *Minto Joe White Malting's Plant Traffic Impact Assessment Addendum*, December 2011.
- > Viterro, DRAFT *Malt Sydney Traffic Management Plan*.
- > BMD, *Sydney Maltings Project Traffic Management Plan – Construction Phase*, July 2011.
- > Heavy Vehicle Drivers Handbook (Roads & Maritime Services)



## 2 Operational TMP Consideration

### 2.1 Department of Planning and Infrastructure requirement

The Operational TMP as discussed herein, addresses the recommendation as stated by the Department of Planning and Infrastructure (DPI) *Assessment Report* dated 20 April 2012 as well as condition 19 of the modified approval.

Below is an extract of the Operational TMP recommendation as stated within the Assessment Report, with the entire document included at **Appendix A**.

*“...the Department has recommended that the Proponent be required to prepare and implement an Operational Traffic Management Plan of the project to ensure:*

- Any traffic impacts on the surrounding road network are minimised*
- The project does not result in any vehicle queuing on the public road network*
- The exportation/importation of material does not occur during night time hours except due to circumstances beyond the control of JWM.”*

The modified approval therefore reads as follows:

*“5) Replacing Condition 19 Schedule 3 with the following:*

*19The Proponent shall prepare and implement an Operational Traffic Management Plan for the Project to the satisfaction of the Director-General. The Plan must:*

- a. be prepared in consultation with RMS and Council;*
- b. be submitted to the Director-General for approval prior to the commencement of importation or exportation of grain, barley or malt to/from the site via road;*
- c. nominate routes for the heavy vehicles accessing the site*
- d. provide details on restrictions proposed for the hours that heavy vehicles may access the site;*
- e. describe the measures that would be implemented to manage traffic safely during operation of the project;*
- f. describe the measures that would be implemented to manage heavy vehicle driver behaviour and traffic noise associated with the development.”*

Further, the Operational TMP is based upon and provides an update to the existing Traffic Management Plan prepared for the Malting Plant. This report incorporates the additional truck movements associated with the amended proposal which is to import up to 54,000 tonnes of grain and export up to 25,000 tonnes of malt via the road network.

### 2.2 Operational TMP report

The Operational TMP has been structured to address the above recommendation and modified condition of approval as follows:

- > Authority consultation, addresses:
  - Amended condition 19, Part a.
- > Truck Import and Export Operations, addresses
  - Assessment Report, first, second and third dot point
  - Amended condition 19, Part d and e
- > Truck Import and Export Routes, addresses
  - Amended condition 19, Part c
- > Drivers Code of Conduct, addresses
  - Amended condition, Part f

It is noted that by the submission of this document, Part b of amended condition 19 is addressed.

### 3 Authority Consultation

Consultation with both Council (Campbelltown City Council) and RMS (Roads and Maritime Services) was undertaken to ensure that this Operational TMP document was prepared in accordance with authority requirements.

Cardno contacted the Land Use and Transport Planning Section within RMS on 1 June 2012 and again on 05 June 2012, which resulted in the following discussed items:

- > No standard template is available for an Operational Traffic Management Plan.
- > All requirements for RMS are stated by the above DPI recommendation and conditions.

Cardno contacted the Council's Planning & Environment Department on 1 June 2012 and again on 05 June 2012, which resulted in the following:

- > No additional concerns were raised.
- > All requirements for Council are stated by the above DPI recommendation and conditions.

### 4 Truck Import and Export Operations

#### 4.1 Malting Plant operational hours

According to site management, the manned operational hours of the Malting Plant outside of which truck access to and from the site is not proposed except in unforeseen circumstances is between 6am - 6pm Monday to Friday.

#### 4.2 Plant access

As stated within the Traffic Impact Assessment Addendum report (prepared by Cardno, 2011), to minimise the impact on the road network:

- > all truck movements associated with the import of grain and export of malts are expected to be dispatched as required, between 9am and 5pm, Monday to Friday.
- > no trucks associated with grain and/or malt transport shall access the site during the weekend hours or outside daylight hours except in unforeseen circumstances where management will need to arrange to unlock the gate to permit access.

Should truck movements occur outside the stated periods as well as during emergency scenarios the following Joe White Malting personnel shall be available to address all traffic management issues.

**Table 1 Emergency Contact Numbers**

Name	Mobile Number	Role
Mr Jase Carroll	0467 793 826	Logistics Manager
Mr Miroslav Prazak	0428 730 151	Plant Manager

#### 4.3 Truck Circulation

The additional trucks required to import and export materials to/from the Malting Plant shall access via the existing entry/exit location on Stonny Batter Road. It is noted that the Intermodal Terminal located at the northern end of Regents Farm Road will provide off site truck storage (should this be required).

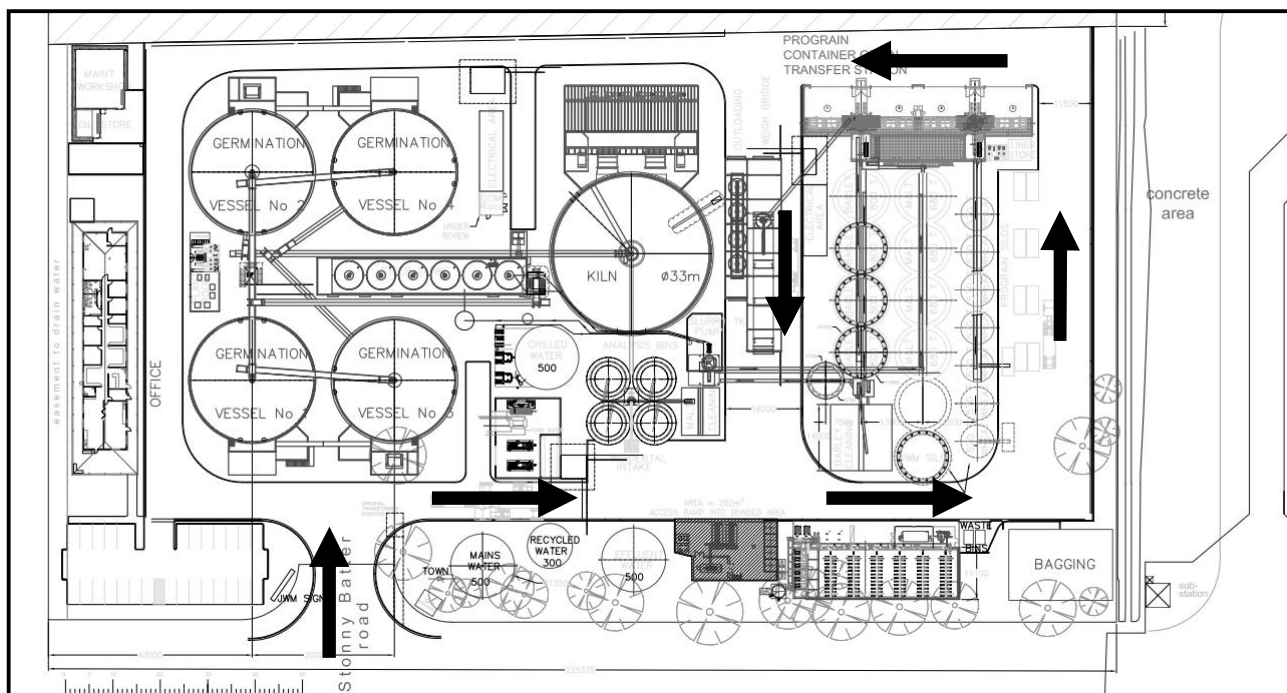
Upon entry, the existing 20m vehicle storage area at the access gate shall be used to provide a queue facility should the expected 19m Articulated Vehicle (AV) be required to stop before proceeding into the site. Due to the even distribution of trucks arriving per day, as discussed in **Section 4.2**, the entry storage area is deemed adequate to alleviate conflict on Stonny Batter Road.

Should the plant be inaccessible due to vehicles occupying the entry storage area, all arriving trucks are to proceed to the Intermodal Terminal to minimise conflict with the local road network.

Internal truck circulation at the plant will be as follows and as indicated on **Figure 2**, in that trucks will:

- > Enter the plant via the Stonny Batter Road access in a forward gear.
- > Turn right and travel northbound along the eastern boundary.
- > Turn left and travel westbound along the northern boundary (past the grain drop off area).
- > Turn left and travel southbound along the western boundary.
- > Turn left and travel eastbound beside the weigh bridge area (past the malt pick up area).

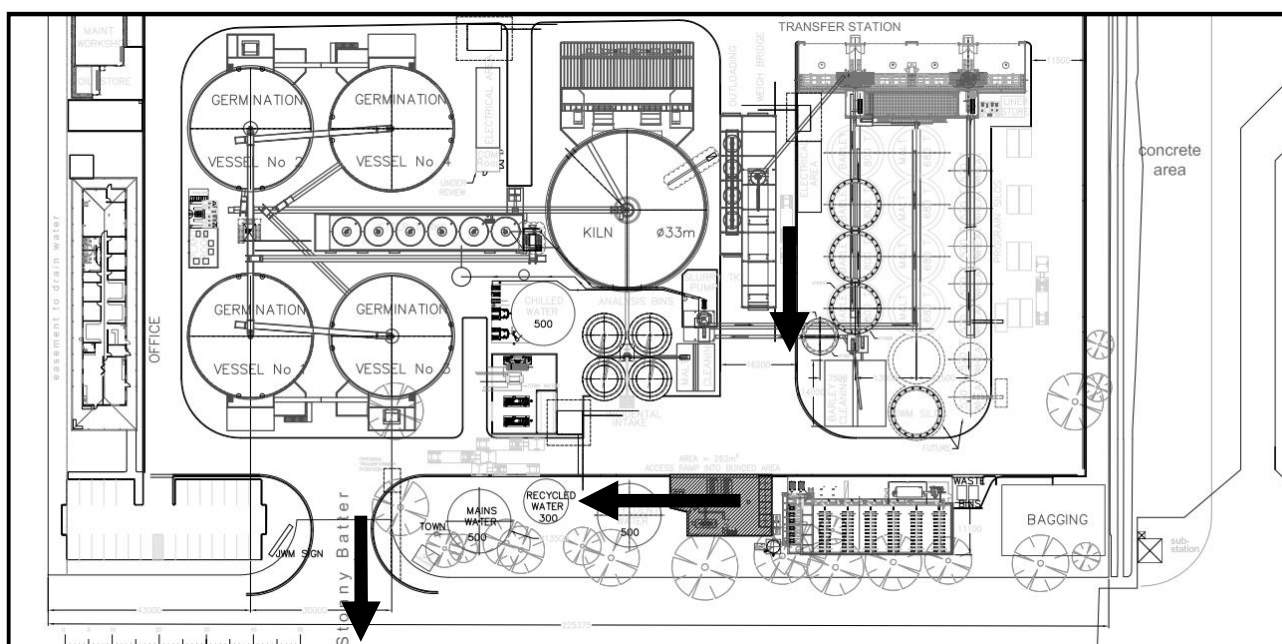
**Figure 2** Internal Circulation - Entry



For all trucks exiting the plant, circulation will be as follows and as indicated on **Figure 3**, in that trucks will:

- > Proceed from the Malting pick up area and travel eastbound.
- > Turn right and travel southbound along the eastern boundary.
- > Turn left and exit the plant in a forward gear.

**Figure 3** Internal Circulation - Exit



Truck swept paths are included at **Appendix B**.

## 4.4 Truck Impacts on Local Road Network

According to the Traffic Impact Assessment Addendum report, confirmed by the Department of Planning and Infrastructure, due to the minor increase in heavy vehicle volumes (around 1%), the amended truck operations would not significantly impact the surrounding road network.

Additionally, as mentioned above, the Intermodal Terminal will be available to store trucks off the road network to ensure plant operations do not result in queuing on Stonny Batter Road.

## 5 Truck Import and Export Routes

Trucks connecting between the plant and surrounding road network (namely Hume Highway) shall utilise the surrounding existing B-Double route. Additionally, it is noted that connections with grain supply and malt storage will be transported via the Hume Highway exit at Campbelltown Road.

Further, for directional origins, trucks shall utilise the following road network to access the site:

- > From north, Hume Highway –
  - Travel southbound along Hume Highway.
  - Exit at Campbelltown Road (south) and travel southbound.
  - Turn left at Rose Payten Drive and travel eastbound.
  - Turn left at Pembroke Road and travel northbound.
  - Turn left at Stonny Batter Road and travel westbound.
  - Enter the Joe White Malting Plant.
- > To north, Hume Highway –
  - Exit the Joe White Malting Plant and travel eastbound along Stonny Batter Road.
  - Turn left at Pembroke Road and travel northbound.
  - Turn left at Ben Lomond Road and travel westbound.
  - Turn left at Campbelltown Road and travel southbound.
  - Turn right at Hume Highway on-ramp (Campbelltown Road south exit).
  - Travel northbound along Hume Highway.
- > From south, along Hume Highway –
  - Travel northbound along Hume Highway.
  - Exit at Campbelltown Road (north) and turn left into Campbelltown Road and travel southbound.
  - Turn left at Rose Payten Drive and travel eastbound.
  - Turn left at Pembroke Road and travel northbound.
  - Turn left at Stonny Batter Road and travel westbound.
  - Enter the Joe White Malting Plant.
- > To south, along Hume Highway –
  - Exit the Joe White Malting Plant and travel eastbound along Stonny Batter Road.
  - Turn left at Pembroke Road and travel northbound.
  - Turn left at Ben Lomond Road and travel westbound.
  - Turn right at Campbelltown Road and travel northbound.
  - Turn left at Hume Highway on-ramp (Campbelltown Road north exit).
  - Travel southbound along Hume Highway.

The above vehicle routes are illustrated on diagrams at **Appendix C**.

## 6 Driver Code of Conduct and Traffic Noise

### 6.1 General

This section addresses the requirement to address driver behaviour and traffic noise.

### 6.2 Driver behaviour

Driver behaviour for vehicles entering and exiting the plant shall be managed by on-site personnel and include the following processes:

- > All truck drivers are to be made aware of and adhere to the existing Traffic Management Plan as well as this Operational Traffic Management Plan.
- > All truck drivers are to adhere to the RMS *Heavy Vehicle Driver Handbook*, December 2011
- > All complaints and comments regarding driver behaviour shall be directed to the following Joe White Malting personnel –

**Table 2 Driver Behaviour Contact Numbers**

Name	Mobile Number	Role
Mr Jase Carroll	0467 793 826	Logistics Manager
Mr Miroslav Prazak	0428 730 151	Plant Manager

### 6.3 Traffic noise

Due to the minor increase in heavy vehicle volumes (around 1%), and considering that the Malting Plant is located within an existing industrial area and that truck access to the site is restricted to daylight hours except in unforeseen circumstances when access will otherwise be managed, the additional traffic noise on the surrounding area will be negligible.

It is noted, however, that truck drivers shall be required to adhere to the RMS *Heavy Vehicle Driver Handbook*, December 2011 document to minimise noise impacts on the surrounding road network.

## APPENDIX A

# A

## DPI REQUIREMENTS







# Planning & Infrastructure

## ASSESSMENT REPORT

### Section 75W Modification Joe White Maltings, Minto Malting Plant and Packing Facility

#### Modification to allow Import/Export Via Road (08\_0157 MOD 1)

## 1. BACKGROUND

In May 2009, the then Minister for Planning approved an application from Joe White Maltings Pty Ltd (JWM) to construct a new maltings plant and grain packing facility at Minto in the Campbelltown Local Government Area (see Figure 1).

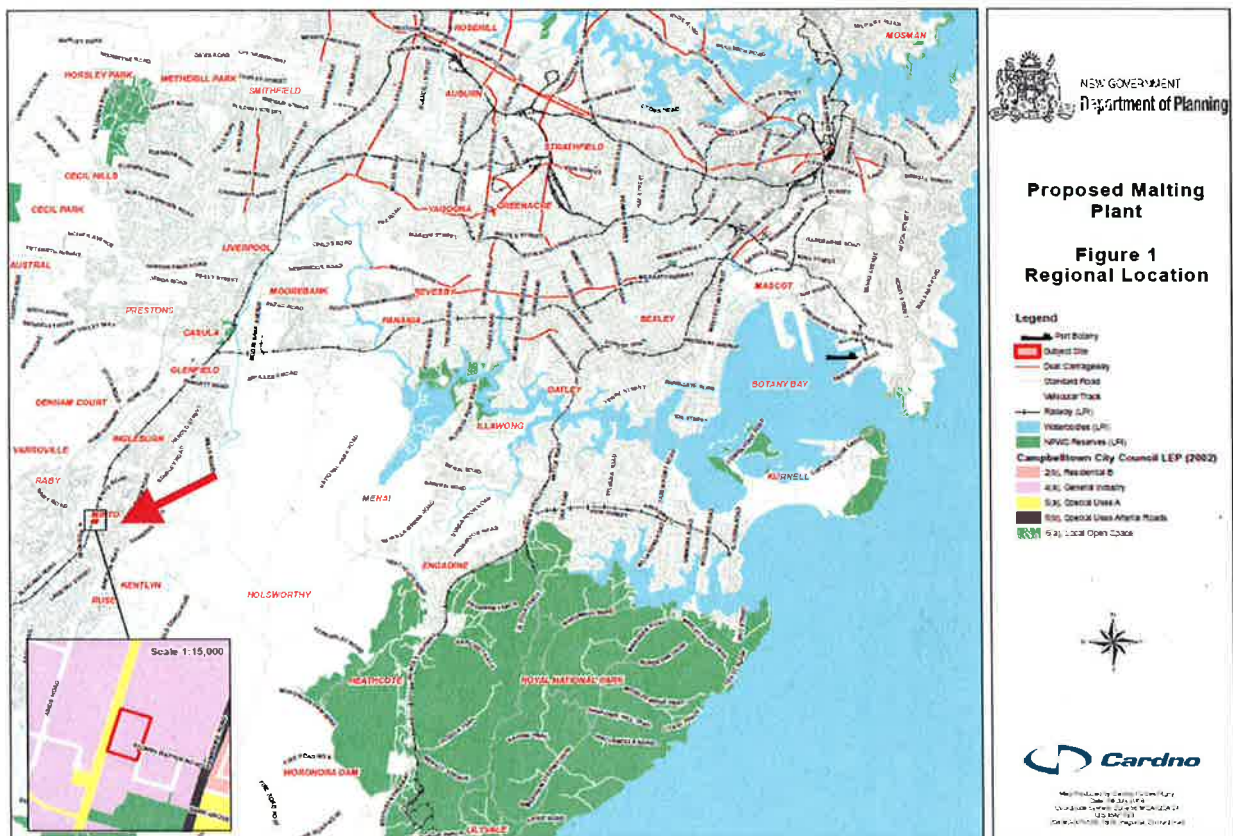


Figure 1: Regional Context (source: Cardno EA)

Generally the 'malting' process involves the germination of cereal grains, such as barley, by initially soaking the grains in water. Once germination occurs the process is halted and the grains are dried and the germination process ceases. Malted grains are then packaged and transported from the site and used to make products such as beer, whisky, malted shakes, malt vinegar, confections, flavoured drinks and baked goods.

The site is located within the Minto industrial area and is adjacent to the Main Southern Railway, which runs along its western boundary (see Figure 2). The site is surrounded by light manufacturing, warehousing and other allied industrial land uses, such as a pharmaceuticals manufacturer, steel and metal fabricators and an intermodal shipping terminal. The nearest residences are located approximately 400 metres to the east of the site.



*Figure 2: Aerial photograph of the site and surrounding land uses*

The 2009 Ministerial approval provided for:

- the importation of no more than 270,000 tpa of malt barley or grain to the site for processing;
- the production of up to 130,000 tpa of processed malt; and
- the exportation of up to 140,000 tpa of processed grain and 130,000 tpa of malt from the site.

Condition 7 of Schedule 2 of the Minister's approval specifies that all raw and finished product deliveries and dispatches must be rail utilising the adjacent Main Southern Railway. Under the current approval, all the grain and malt would arrive at, and be dispatched from the site within shipping containers and would be loaded utilising materials handling equipment located at the adjoining Macarthur Intermodal Shipping Terminal (MIST).

As such, the approved project provides for a maximum of only 68 vehicle movements per day. This figure includes light and heavy vehicles, contractor, visitor and waste removal vehicles.

JWM are now seeking to modify the approval to allow the transfer of a limited quantity of raw and finished product by road.

## **2. PROPOSED MODIFICATION**

JWM seeks to amend Condition 7 of Schedule 2 of the existing project approval, to permit the transportation of 54,000 tpa (20%) of imported grain and barley, and 25,000 tpa (20%) of exported malt from the site by road.

As stated in Section 1 of this assessment report, the 2009 approval allowed for the exportation of up to 130,000 tpa of malt product via rail. JWM now proposes that 25,000 tpa of the malt would be exported via road. Likewise, the original approval allowed for up to 270,000 tpa of grain to be imported via rail.

JWM now proposes that 54,000 tpa of the grain material would be imported by road. No less than 80% of raw and processed product would continue to arrive at, and leave the site via the existing heavy rail siding adjacent to the site.

Condition 7 of Schedule 2 states that;

*"The Proponent shall ensure that all the grain and barley imported onto the site, and all the malt and grain exported from the site, occurs via the adjoining rail siding to the Main Southern Railway. However, in exceptional circumstances, the Proponent may ignore these restrictions for short periods with the written approval of the Director-General".*

In the original traffic assessment it was stated that the Proponent would be taking maximum advantage of the existing intermodal infrastructure, especially the ability to reduce road freight impacts, costs and inefficiencies by utilising rail, with access to an excess of containers available for storage and export on the adjacent MIST site. Notwithstanding, it has recently become apparent to JWM that a limited amount of product would need to be transported via road.

JWM's major domestic customer, Tooheys Brewery at Lidcombe, now requires that the malt supplied for their processing comes from the Minto plant via road, as it is not possible to deliver malt to the brewery by rail. Additionally, the supply of grain can change seasonally and limited storage and low railhead stock availability makes it necessary for a percentage of grain to be transported by road from northern NSW.

### **3. STATUTORY CONTEXT**

Under clause 8J(8) of the *Environmental Planning and Assessment Regulation 2000*, the Minister's consent is taken to be an approval under Part 3A of the Act and can be modified by the Minister under section 75W of the Act.

The Executive Director may determine this application on behalf of the Minister in accordance with the Minister's delegation of 14 September 2011, subject to the following:

- the relevant local Council has not made an objection;
- a political disclosure statement has not been made; and
- there are less than 25 public submissions in the nature of objection.

As Council has not objected to the proposal, no public submissions have been made, and JWM has not made a political donation, the Department is satisfied that the application meets the terms of the delegation and the Executive Director may determine the application under delegated authority.

### **4. CONSULTATION**

Under Section 75W of the EP&A Act, the Department is not required to notify or exhibit the application.

The Department made the EA for the modification publicly available on its website and sought submissions from the Campbelltown City Council (Council) and the Roads and Maritime Service (RMS). Consultation with other government agencies and neighbouring sites was considered unnecessary, as the environmental impacts of the proposal would essentially remain unchanged from the approved project. A copy of the agencies submissions is available at Appendix 3.

The RMS did no objection to the proposed modification and raised no issues of concern.

Council did not objection to the proposed modification however, concerns were raised in regard to developer contributions, truck queuing on public roads and traffic noise. These issues are addressed in Section 5 of this assessment report.

### **5. ASSESSMENT**

In its review of the modification application, the Department has considered:

- the previous approval;
- submissions made on the original and current applications; and
- JWM's traffic impact assessment for the proposed modification (Cardno, 2011).



The Department has assessed the application on its merits, and considers the key environmental issue to be traffic, noise and developer contributions.

## **5.1 Traffic**

### ***Issue***

Increased truck movements to and from the subject site could impact on the traffic conditions on surrounding road networks.

### ***Consideration***

JWM proposes to utilise 19 metre articulated vehicles (AV) to transport a portion of the malt and grain materials via road. Approximately 10 AV's would be required to transport grain and malt material to and from the site (this equates to approximately 20 truck movements) per working day. It is expected that AV entry and exit movements would be evenly distributed throughout the day, with only one truck evident during each AM and PM peak hour periods.

The two main roads that would be immediately affected by the increased vehicle movements into and out of the site are Stonny Batter Road and Pembroke Road (refer to Figure 3). Pembroke Road is a north-south running State road which provides a connection to Rose Payten Drive and Ben Lomond Road. Pembroke Road carries approximately 1,000 vehicles in both directions during weekday peak periods, and varies from a four-lane divided carriageway to a two-lane undivided carriageway.

Stonny Batter Road is a Council road running east-west from Pembroke Road to the railway line. It is 12 metres wide and devoid of line marking, except at its eastern end where three lanes are marked on approach to the Pembroke Road intersection. Stonny Batter Road carries approximately 50 vehicles in both directions during the weekday AM peak period and 150 vehicles in both directions in the weekday PM peak period.

The proposed 10 AV's per day would amount to a 1% increase in existing background traffic volumes, which JWM considers to be minor. According to the SIDRA analysis program, which calculates the performance of intersections, the Pembroke/Stonny Batter Road intersection is already failing during both AM and PM peak hour traffic conditions, with an average Level of Service of F. The estimated 1% increase in traffic generation by the proposed modification is not considered to be significant.

In its submission on the modification proposal, Council generally raised no objection. However, Council's submission requested that the Department consider the potential impacts of trucks queuing on Stonny Batter Road prior to entering the site and the physical impact of increased truck movements on local and State roads.

The RMS raised no objections to the proposed modification or concerns regarding the minor increase in traffic.

### ***Conclusion***

The Department is satisfied that the minor increase in traffic numbers associated with the proposed modification would not result in any significant impact to the surrounding road network. Further, the existing approval includes conditions that require the Proponent to ensure the Project does not result in any queuing on public roads, which addresses Council's concerns.

Notwithstanding, the Department has recommended that the Proponent be required to prepare and implement an Operational Traffic Management Plan for the Project to ensure:

- any traffic impacts on the surrounding road network are minimised;
- the project does not result in any vehicles queuing on the public road network; and
- the exportation/importation of material does not occur during night time hours except due to circumstances beyond the control of JWM.



Figure 3: Intersection of Stonny Batter Road and Pembroke Road

## 5.2 Noise

### **Issue**

An increase in traffic could potentially increase traffic noise for surrounding residents.

### **Consideration**

The Department notes that increased truck movements could generate noise impacts on surrounding receivers, in particular the residential area located directly east of Pembroke Road. Monitoring was conducted during the original assessment and traffic noise was not considered to be a key noise issue for surrounding residents.

Given that the Project is expected to only marginally increase traffic generation (only 1%), it is considered that the additional 10 trucks per day would not result in any existing noise levels. Further, the site is located within a heavy industrial area, and existing conditions prohibit truck movements during the night time periods except under exceptional circumstances, as a means of managing noise generation from the site.

In its submission on the modification proposal, Council raised concerns that the proposal could result in an increase to background noise levels resulting from an increase in road transportation from the site.

### **Conclusion**

Given the limited number of additional traffic movements from the modification and the existing conditions which restrict night time activities on the site, the Department is satisfied that any increase in background noise levels would be negligible.

The Department is satisfied that any potential noise impacts could be managed through existing conditions of approval.

### 5.3 Developer Contributions

#### **Issue**

The requirement for the Proponent to pay additional developer contributions.

#### **Consideration**

As part of the determination of the JWM Project, conditions were included in the approval which required the Proponent pay a development contribution to Council to the amount of \$50,000 (ref. Condition 13 Schedule 2 of the existing approval).

As the proposed modification seeks to increase local road use, Council has requested that additional contributions be made by the Proponent to provide for the funding of maintenance for local road projects.

The *Campbelltown City Council Section 94A Levy Contributions Plan* was adopted in August 2011. The Plan specifies the types of development to which the plan applies and that contributions are required to be paid based on the value of the development.

Table 1 of the Plan specifies that development comprising work valued at less than (or equal to) \$100,000 do not attract a contribution levy. JWM has indicated that the proposed modification does not have any capital investment value, and as such, there is no trigger for payment under the current contributions Plan.

#### **Conclusion**

The proposed modification would not result in an increase in employment or an increase in demand on existing infrastructure and resources; and does not have any capital cost. As such, the Department does not consider there to be a nexus between Council's request for additional developer contributions and the proposed modification.

### 6. CONCLUSION

The Department has assessed the proposed modification in accordance with the requirements of clause 8B of the Regulations. This assessment has found that the proposed modification:

- is unlikely to have any environmental impacts beyond the approved facility; and
- would allow for the transport of grains and products to regional customers and clients, which would give a greater product flexibility; and support regional business.

Consequently, the Department is satisfied that the modification should be approved.

### 7. RECOMMENDATION

It is **RECOMMENDED** that the Acting Executive Director:

- **consider** the finding and recommendations of this report;
- **approve** the proposed modification subject to conditions; and
- **sign** the attached notice of modification (tagged A).

Christine Chapman  
Environmental Planner  
Industry, MPA



Chris Ritchie  
Manager – Industry  
Major Project Assessments

20/4/12



Heather Warton  
A/Executive Director  
Major Project Assessments

20/4/12



# Notice of Modification

## Section 75W of the *Environmental Planning and Assessment Act 1979*

As delegate for the Minister for Planning and Infrastructure, I hereby modify the project approval to in Schedule 1, subject to the conditions in Schedule 2.



Heather Warton  
A/Executive Director  
**Major Projects Assessment**

Sydney 20th April

2012

### SCHEDULE 1

**Application Number:** 08\_0157  
**Proponent:** Joe White Maltings Pty Ltd  
**Approval Authority:** Minister for Planning  
**Land:** Lot 201 DP 813362 - Stonny Batter Road, Minto  
**Project:** Minto Malting and Grain Project

### SCHEDULE 2

**1) Delete the following references from Definitions and Schedules 2, 3 and 4:**

DECC	Department of Environment and Climate Change
RTA	Roads and Traffic Authority

**2) Insert the following references in Definitions and Schedules 2, 3 and 4:**

Department	Department of Planning & Infrastructure
Director-General	Director-General of Department of Planning & Infrastructure, or delegate
EPA	Environmental Protection Authority
Minister	Minister for Planning & Infrastructure, or delegate
RMS	NSW Roads and Maritime Service

**3) Replace Condition 2 Schedule 2 with the following:**

2. The Proponent shall carry out the project generally in accordance with:
  - a. EA;
  - b. site plan (see Appendix 1);
  - c. statement of commitments (see Appendix 2);
  - d. Modification Application 08\_0157 - Mod 1 with supporting documentation by Cardno dated 11 December 2011 and 14 December 2011; and
  - e. conditions of this approval.

**4) Replace Condition 7 Schedule 2 with the following:**

7. The Proponent shall ensure that the Project:
- a) does not import more than 54,000 tonnes per annum of grain and barley by road;
  - b) does not export more than 25,000 tonnes per annum of malt and grain by road; and
  - c) imports/exports all remaining grain and malting barley via the rail siding to the Main Southern Railway.

However, in exceptional circumstances, the Proponent may be exempt from these restrictions for short periods with the written approval of the Director-General.

**5) Replacing Condition 19 Schedule 3 with the following:**

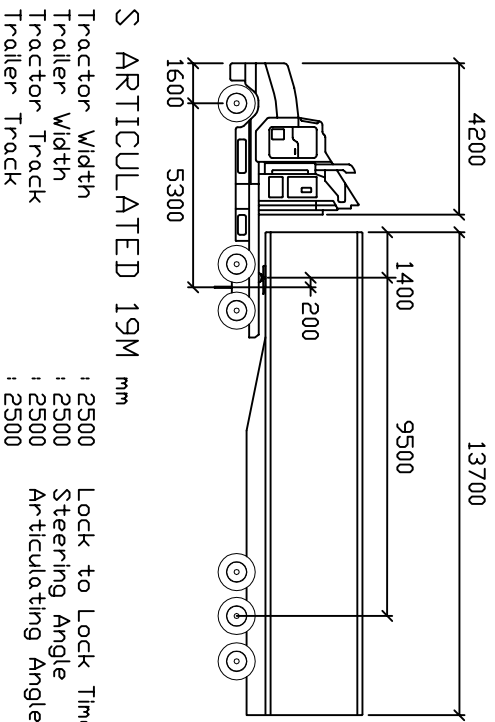
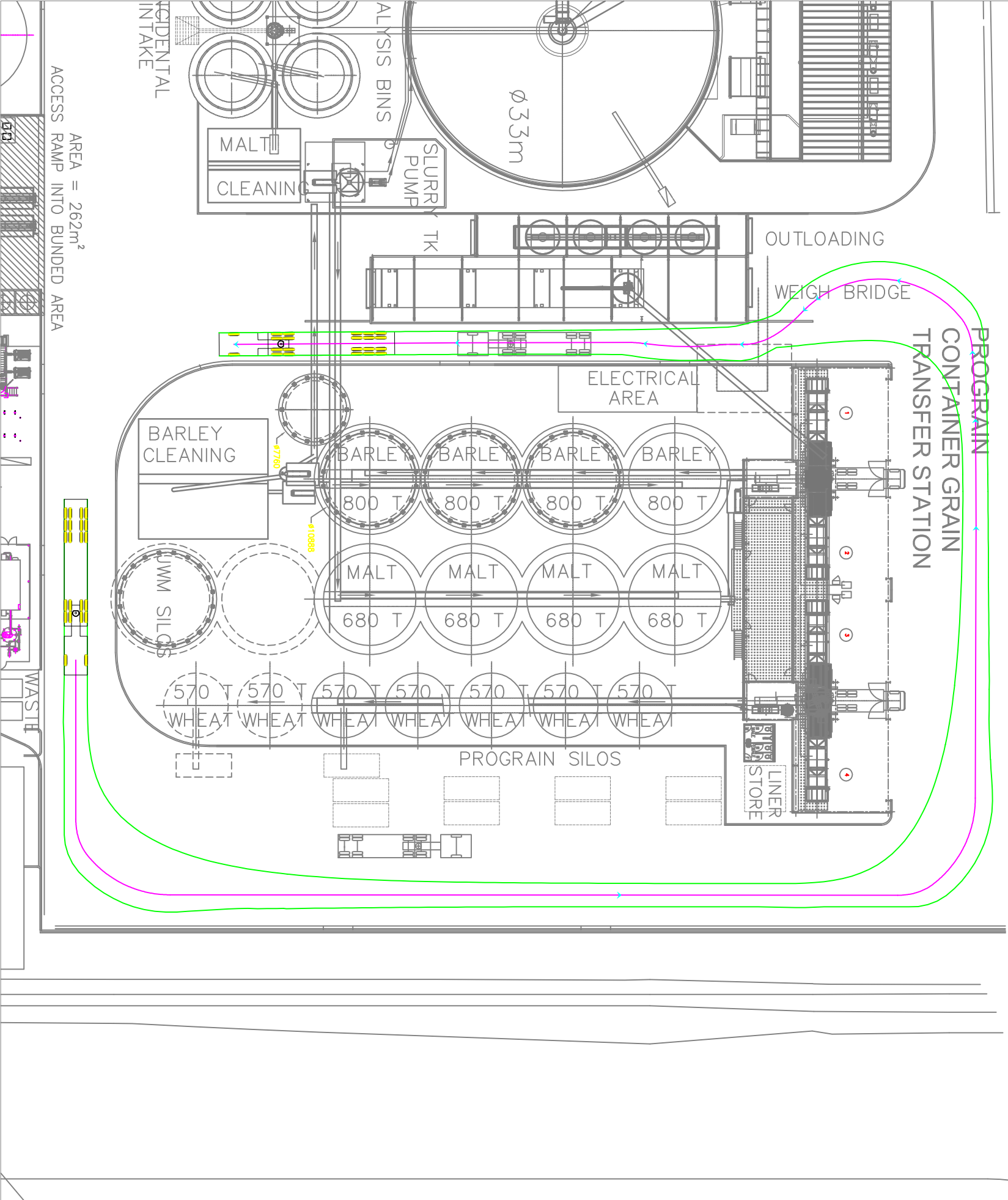
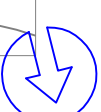
19. The Proponent shall prepare and implement an Operational Traffic Management Plan for the Project to the satisfaction of the Director-General. The Plan must:
- a. be prepared in consultation with the RMS and Council;
  - b. be submitted to the Director-General for approval prior to the commencement of importation or exportation of grain, barley or malt to/from the site via road;
  - c. nominate routes for the heavy vehicles accessing the site;
  - d. provide details on restrictions proposed for the hours that heavy vehicles may access the site;
  - e. describe the measures that would be implemented to manage traffic safety during operation of the project; and
  - f. describe the measures that would be implemented to manage heavy vehicle driver behaviour and traffic noise associated with the development.

## APPENDIX B

# B

## TRUCK SWEPT PATHS





S ARTICULATED 19M mm

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

Figure No: SK-03 | Project No: 600330 | Date: Nov 2011

JOE WHITE MALTINGS PLANT  
19m Articulated Vehicle Swept Path

## APPENDIX C

# C

## TRUCK ROUTES





