



Traffic Management Plan

For Banksmeadow Transfer Terminal

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QUALITY INFORMATION

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Definitions/Abbreviations

BTT	Banksmeadow Transfer Terminal
CEMP	Construction Environmental Management Plan
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
KL	Kilo-Litres
km	kilometre/s
km/h	Kilometres per hour
L	Litres
m	Metre
m³	Cubic metre
NIMS	National Integrated Management System
non-putrescible waste	“general solid waste (non-putrescible)” as per the Waste Classification Guidelines, Part 1; Classifying Waste (EPA, 2014)
NVMP	Noise and Vibration Management Plan
OEMP	Operational Environmental Management Plan
POEO Act	Protection of the Environment Operation Act 1997
putrescible waste	“general solid waste (putrescible)” as per the Waste Classification Guidelines, Part 1; Classifying Waste (EPA, 2014)
Rd	Road
RMS	Roads and Maritime Services
St	Street
T	tonnes
TfNSW	Transport for New South Wales
The Vault	Veolia Incident and Compliance Management System
TMP	Traffic Management Plan
TPA	Tonnes Per Annum
Veolia	Veolia Australia and New Zealand
WAD	Works Authorisation Deed
WHS	Work Health and Safety (Act and Regulation)

SECTION 1 INTRODUCTION

1.1 Overview

Veolia Australia and New Zealand (Veolia) operates the Banksmeadow Transfer Terminal (BTT), which is located at 14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow (refer to site plans in OEMP Appendix A).

The BTT facility has been approved receive up to 500,000 tonnes per annum (TPA) of waste (including 400,000 TPA of putrescible waste and 100,000 TPA of non putrescible waste) from within the Sydney Region. The waste will be containerised and loaded onto rail wagons for transportation by rail to the Woodlawn Eco Project Site (owned and operated by Veolia) in the Southern Tablelands (approximately 250 kilometres southwest of Sydney) for treatment, recycling and energy recovery.

The BTT includes the following infrastructure:

- An access road for waste trucks entering and exiting the facility from Beauchamp Road.
- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.
- A hardstand area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading on to trains.
- Rail sidings for the loading of containers onto trains for rail transport to Woodlawn.

The NSW Department of Planning and Environment (DPE) assessed the State Significant development (SSD 5855) and granted Development Consent for the 'State Significant' development on 28 April 2015, in accordance with section 89 (e) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In addition, an Environmental Protection Licence (EPL) has been issued under the *Protection of the Environment Operations Act 1997* (POEO Act) by the NSW Environment Protection Authority (EPA).

This Traffic Management Plan (TMP) has been prepared to meet the regulatory requirements for the operation of the Banksmeadow Transfer Terminal (BTT). The TMP details control strategies for traffic movements onsite and offsite throughout the operation of the BTT and forms part of the Operational Environmental Management Plan (OEMP).

1.2 Legal and Other Requirements

1.2.1 Conditions of Development Consent

Conditions 22 to 29 of Schedule 3: Environmental Performance Conditions of the Development Consent relates to traffic management. In particular, Condition 29 requires the preparation and implementation of a Traffic Management Plan to the satisfaction of the Secretary.

The conditions of consent considered relevant to this TMP are provided in Table 1.1, below.

Table 1.1 Operational Consent Requirements

Relevant Condition	Requirement	TMP Reference
Access Road and Upgrade Works		
22	Prior to the commencement of operations, the Applicant must obtain approval for rail access from the Australian Rail Track Corporation.	Noted
23	Prior to the commencement of operations, the Applicant must undertake the road upgrade works at the intersection of Beauchamp Road and Perry Street and the left turn deceleration lane into the site, in consultation with City of Botany Bay Council and Randwick City Council, and to the satisfaction of RMS and the Secretary.	Noted
24	Detail design plans for the intersection works referred to in condition 23 above, including Traffic Control Signal plans, must be prepared by a suitably qualified person in consultation with City of Botany Bay Council and Randwick City Council and submitted to the RMS for review and endorsement prior to the commencement of construction of the road upgrade works. The Applicant will be required to enter into a Works Authorisation Deed (WAD) with the RMS for the works. The WAD will need to be executed prior to the RMS's assessment of the detailed design plans.	Noted
25	The Applicant must be responsible for all public utility adjustment/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents.	Noted
26	All works/regulatory signposting associated with the development are to be at no cost to the RMS	Noted
Traffic Monitoring		
27	The Applicant shall:	
27(a)	keep accurate records of the volume of waste transported to the site;	See WMP
27(b)	nominate a haulage route to be used by heavy vehicles accessing the site; and	See Section 4.1.1

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27(c)	make these records available in its Annual Review	See Section 5.2
Operating Conditions		
28	The Applicant shall ensure that:	
28(a)	internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2;	Noted.
28(b)	the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTRROADS Guide to Road Design;	Noted
28(c)	the Development does not result in any vehicles queuing on the public road network;	Refer Section 4.1.3
28(d)	a right turn restriction into the site from Beauchamp Road shall be implemented between 6am – 10am and 3pm – 7pm;	Refer Section 4.1.1
28(e)	heavy vehicles do not use Perry Street to travel to/from the site;	Refer Section 4.1.1
28(f)	heavy vehicles and bins associated with the Development do not park or stand on local roads or footpaths in the vicinity of the site;	Refer Section 4.1.3
28(g)	all vehicles are wholly contained on site before being required to stop;	Refer Section 4.2.1
28(h)	all loading and unloading of materials is carried out on site;	Refer Section 4.2.1
28(i)	the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;	Refer Section 4.1.2
28(j)	all trucks entering or leaving the site with loads have their loads covered; and	Refer Section 4.2.1
28(k)	all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.	See Section 4.1.2
Traffic Management Plan		
29	The Applicant shall prepare and implement a Traffic Management Plan for the development, to the satisfaction of the Secretary. The Plan must:	This Plan
29(a)	be prepared by a suitably qualified and experience expert in consultation with RMS, City of Botany Bay Council and Randwick City Council;	Noted
29(b)	be approved by the Secretary prior to the commencement of construction;	Noted

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29(c)	include construction traffic management measures detailing: <ul style="list-style-type: none"> • access and parking arrangements for the site during construction; • measures to ensure that the local road network is not utilised by vehicles during construction; • measures to control traffic movements from site during construction; • procedures for notifying residents of construction traffic routes and potential disruptions to routes and access; and • the impact of the development on the road network, where temporary road closures are required during construction. 	Not relevant for operations
29(d)	include a plan showing the designated haulage route/s to be used by heavy vehicles during operation;	See Section 4.1.1
29(e)	include a drivers code of conduct;	See Section 4.2.1
29(f)	describe the measures that will be implemented to ensure: <ul style="list-style-type: none"> • the nominated haulage routes are used; • drivers adhere to the right turn restriction into the site from Beauchamp Road between 6am-10am and 3pm-7pm, as required by Condition 28 (d); • conflicts with other road users are minimised; • drivers adhere to the code of conduct including; • road noise impacts are minimised through measures such as limiting truck compression braking; and compliance with the relevant conditions of this consent.	See Section 5.1
29(g)	include a program to monitor the effectiveness of these measures.	See Section 5.2

1.2.2 Mitigation Measures

In addition, the operational mitigation measures appended to the Consent Conditions for waste management are presented below.

Table 1.2 Operational Mitigation Measures Requirements

	Mitigation Requirement	TMP Reference
1	The requirements of the Roads Act and the Road Transport (General) Act will be followed at all times, including notice requirements, consultation and consent/concurrence requirements for works in, or closures of, public and classified roads and the use of RAV routes for semi-trailers.	Noted
2	Veolia will enter into a Works Authorisation Deed with RMS for the upgrade of the Beauchamp Road / Perry Street intersection. Detailed design of the intersection upgrade works will be undertaken in accordance with the Works Authorisation Deed and will be designed in accordance with RMS' standards and specifications.	Noted
3	The Site Access will provide access for future land use development proposals on the Asciano land, to the immediate north of the Banksmeadow TT site. Detailed design for the Site Access via a single shared Beauchamp Rd Intersection will be designed for Veolia's required traffic movements plus a minimum of 100 traffic movements (in & out) per	Noted

	hour for the remaining portion of the Asciano Site not being leased by Veolia.	
4	During development of the detailed design of the Perry Street /Beauchamp Road intersection upgrades, consideration will be given to the development of engineered measures to restrict trucks using Perry Street to access the Site from the east.	Noted
5	Veolia would liaise with City of Botany Council regarding clearing or trimming of vegetation on the western side of McPherson Street, at the intersection with Beauchamp Road, to re-instate a safe entering sight distance sight line.	
6	Veolia will liaise with Botany Bay City Council regarding the implementation of kerb side parking restrictions on McPherson Street and adjust line-marking, to allow vehicles to approach the intersection on a perpendicular angle.	Noted
7	Interconnectivity will be provided within the Proposal site between the McPherson Street entry and the Perry Street / Beauchamp Road access to the Banksmeadow TT.	Refer to Figure 4.2
8	Detailed design of the Site will provide for appropriate queuing space provided the approach to the Perry Street/ Beauchamp Road access and provide layover areas for staggering dispatch of trucks.	Refer Section 4.1.3
9	A Traffic Management Plan will be developed for the Proposal that will specify the following:	
9(a)	Trucks accessing the Site will be strictly prohibited from using Perry Street.	Refer Section 4.1.1
9(b)	No right turn movements from Beauchamp Road into the Site would be permitted during the peak AM and PM hours.	Refer Section 4.1.1
9(c)	An induction process and education program will be developed for the Site, which will specify the access route restrictions.	Refer Section 4.2.5
9(d)	Development of a monitoring and recording program and an enforcement program that will provide for the monitoring and recording of vehicles accessing the site and provide a mechanism for retraining and reprimand of drivers observed breaching the access restrictions or waste acceptance requirements on the site.	Refer Section 5.1
9(e)	Development of a traffic congestion procedure for McPherson Street, that will specify the measures to be implemented to manage any potential traffic impacts on neighbouring businesses. This procedure will be developed in consultation with Botany Building Recyclers.	Refer Section 4.1.3
10	Asciano will secure rail access from ARTC on behalf of the Proposal from ARTC prior to commencement of operation of the Proposal. .	Noted

1.2.3 Environment Protection Licence

There were no specific traffic management mitigation measures required in Environmental Protection Licence 20581, however it is required that Veolia make all efforts to control environmental pollution from the BTT.

1.3 Stakeholder Consultation

1.3.1 Government Bodies

The following government bodies were consulted with as part of the preparation of this TMP:

- NSW Department of Planning and Environment
- NSW Environment Protection Authority (EPA)
- City of Botany Bay Council (Botany Council)
- Randwick City Council (Randwick Council)
- Roads and Maritime Service

1.3.2 Community

Veolia aims to ensure that the local community remains informed of the progress of the project in a pro-active and responsive manner. Veolia's communication may include the following where applicable:

- public notices and announcements;
- meetings and correspondence with appropriate regulatory authorities; and
- discussions with adjoining land owners / neighbours who may be affected by the BTT.

The key objectives of the community focused communication and consultation program include:

- Educating stakeholders regarding key aspects of the the BTT; and
- Informing community groups and neighbours to help Veolia understand concerns.

The following avenues provide availability of information about the BTT:

- Dedicated Veolia webpage:
<http://www.veolia.com.au/sustainable-solutions/community-development/banksmeadow-transfer-terminal>
- Community telephone line:

Location	Contact
BTT 24 hour feedback line	1800 298 981
Port Botany Resource Recovery Facility Weighbridge (24 hours)	02 9311 0166

- Dedicated email address:
banksmeadow@veolia.com.au
- Published monitoring data:
<http://www.veolia.com.au/sustainable-solutions/environmental-compliance/nsw-environmental-monitoring-data>

SECTION 2 GOALS OF THE TMP

2.1 Scope and Objectives

The objective of this TMP is to provide traffic management procedures to form part of the BTT Operational Environmental Management Plan (OEMP). It has been prepared to align with the needs of the BTT Consent Conditions and relevant legislation,

The objectives of the TMP are to describe the measures to ensure that:

- the nominated haulage routes are used including adherence by drivers to any road use restrictions;
- conflicts with other road users are minimised;
- drivers adhere to Veolia's driver code of conduct;
- road noise impacts are minimised through measures such as limiting truck compression braking;
- manage on site movements of Banksmeadow Transfer Terminal (BTT) as set out in Condition 29 (Traffic Management Plan) and Appendix A (Management and Mitigation Measures) of the Development Consent.

Additionally the TMP will illustrate the designated haulage route/s for use by heavy vehicles during operation to and from the site.

2.2 Roles and Responsibilities

The following table details the roles and responsibilities associated with the TMP.

Table 2.1 TMP Roles and Responsibilities

Action	Responsibility	Timing
Overall implementation of the TMP	Facilities Manager	Ongoing
Implementation of monitoring program and report compilation	Facilities Manager or nominee(s)	Ongoing
Maintain internal records of monitoring	NSW Technical and Engineering Team	As required
Collate and maintain records of complaints, respond to complainant	Facility Manager and/or nominee	Upon receipt of complaint
Identify non-conformances and notify Facility Manager/ Safety Health Environment Quality (SHEQ) Representative	Operational Personnel	Ongoing
Authorise and confirm the implementation of mitigation measures	Facility Manager/SHEQ Representative	As required
Training and communication	Facility Manager/SHEQ Representative	Training as required, 12 monthly corporate refreshers Monthly toolbox meetings to discuss any safety and

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		<p>compliance issues, including dust, that have arisen since the previous meeting.</p> <p>Review of any complaints received relating to dust and reports from monitoring conducted as a result</p>
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SECTION 3 EXISTING ENVIRONMENT AND OPERATIONAL IMPACTS

3.1 Existing Environment

Entry to the BTT site is via a left turn from Beauchamp Road, or right turn at the traffic lights/signals. Exiting is either left or right at the traffic lights/signals. The site has an entry right turn restriction into the site from Beauchamp Road between 6am – 10am and 3pm – 7pm and heavy vehicles are restricted from using Perry Street to travel to/from the site.

The BTT shall accept waste from municipal, commercial and industrial sources, delivered by both Veolia and contracted customers. No waste can be delivered by nor will be accepted from private non-commercial vehicles.

3.1.1 Operational Activities

All waste transport vehicles enter the BTT site from Beauchamp Road, and then via the incoming weighbridge. Vehicles accessing the waste area of the transfer terminal building drive in via the entry door on the north-east corner of the building. The vehicles then back up to the northern or western wall and deposit their load, before exiting via the same entry, on the alternate side.

Employee and visitors also use the McPherson Street entrance. However, they use the eastern driveway to access the parking provided adjacent to the transfer terminal building. 23 car parking spaces are provided for staff and visitor parking.

3.1.1.1 Operation Hours

Operation of the Terminal is up to 24 hours, seven days a week, with truck movements peaking in the morning and early afternoon.

3.1.1.2 Operational Vehicle Types

A range of waste vehicle types will deliver waste to the BTT, with the majority of vehicles delivering putrescible waste being either front lift or rear lift trucks.

Front lift trucks, an example of which is shown in Figure 3.1 below, can lift bins with a capacity of up to 4.5 m³. They range in length between approximately 9 m and 11 m and a turning circle of approximately 23 m.



Figure 3.1 Front lift truck

Rear lift trucks, an example of which is shown in Figure 3.2, generally have capacity to transport between 6 m³ and 19 m³ of waste. Rear lift trucks may have a height up to 3.3 m, a length up to 10.1 m and turning circle of approximately 15 m



Figure 3.2 Rear lift truck

3.2 Predicted Traffic Impacts

A traffic impact assessment was undertaken as part of the BTT EIS to assess the potential impacts of the project on traffic and transport, once the terminal is operating at full capacity.

Table 3.1 EIS Risk Assessment

Issue	Potential Impacts	Comment	Preliminary Risk Ranking	Key Issue? (Y/N)
Traffic and access	Increased traffic volumes and frequency, including heavy vehicles, placing pressure on intersection and road capacities within the vicinity of the Site.	The facility will be open to receive waste 24 hours a day, seven days a week. Vehicle types accessing the Site will include heavy vehicles up to, and including, semi-trailers (19.0m).	High	Y - Intersection upgrade under a WAD
	Reduction in road safety as a result of increased number of heavy vehicles operating on the road networks around the Banksmeadow TT site.	The Banksmeadow TT results in an increase of trucks accessing the Site from Beauchamp Road and McPherson Street. The size and mass of trucks means that they have greater potential to cause a serious road accident than light vehicles.	Moderate	Y - Intersection upgrade under a WAD
	Accidents occurring on-site as a result of light and heavy vehicles, trains, container handlers and machinery operating within close proximity.	The operation of numerous vehicles on the Site, including trains, trucks, front-end loaders and container handlers, has the potential to result in a collision if not appropriately managed.	Very high	Y - See Section 4.1.2
	Operation of rail link not accommodated within ARTC's network.	Insufficient train paths available within the ARTC rail network to accommodate the proposal. Design or operation of the proposal is not consistent with ARTC operating standards.	High	Y – ARTC has provided written approval to the rail provider to operate trains from the BTT
Noise and vibration	Noise impacts on adjacent receivers from Site operations.	Operational noise and vibration in relation to loading, unloading and dropping of containers, as well as from reversing vehicles and deposition of waste on the transfer terminal floor.	Moderate	Y - See NVMP
	Noise impacts on adjacent receivers from trucks and trains accessing the Site.	Increased noise from rail and vehicular traffic going to and from the Site.	Moderate	Y – See NVMP

Once operating at full capacity the BTT would see up to 215 trucks per day for the delivery of putrescible waste and up to 140 trucks per day for the delivery of non-putrescible.

The transfer of putrescible waste from the facility is via rail, requiring one train per day, and the transfer of non-putrescible waste from the facility requires up to 16 trucks per day.

As a result of the traffic impact assessment a number key of issues for traffic management at the BTT were identified. These included:

- Increased traffic volumes and frequency, including heavy vehicles, placing pressure on intersection and road capacities within the vicinity of the Site
- Reduction in road safety as a result of increased number of heavy vehicles operating on the road networks around the BTT
- Accidents occurring on-site as a result of light and heavy vehicles, trains, container handlers and machinery operating within close proximity
- Rail access to and from the site via external rail networks.

Table 3.2 shows the predicted vehicle volumes expected as a result of the BTT operations. The following sections provide the predicted traffic impacts as modelled through the EIS process.

Table 3.2 - Existing versus future traffic volumes (number of vehicles)

Intersection	Period	Existing Case	Proposal development case
Beauchamp Road/Perry Street/ Site Access	AM Peak	2029	2077
	PM Peak	1970	1998
Beauchamp Road / Denison Street	AM Peak	1915	1925
	PM Peak	1829	1835
Botany Road / Beauchamp Road	AM Peak	2856	2898
	PM Peak	2899	2925

3.2.1 **Beauchamp Rd/ Perry St:**

The modelled results indicate that, without the implementation of mitigation measures (as detailed later in the TMP), traffic associated with the BT and other development within the area would have impacted on the route times of Bus Route 309 / L09 / X09 along Beauchamp Road. The implementation of the mitigation measures identified restore the function of this intersection to its current operating capacity. Consequently, impacts on the service are not predicted.

3.2.2 **Beauchamp Rd/ Denison St:**

The BTT traffic has marginal impacts to this intersection and does require mitigation measures as a direct result of the BTT alone.

3.2.3 Botany Rd/ Beauchamp Rd:

This intersection has sufficient capacity to absorb the additional traffic generated by the BTT, other major land use changes, and the growth in background traffic. No mitigation measures were proposed for this intersection.

SECTION 4 TRAFFIC MANAGEMENT MEASURES

4.1 Traffic Control Mitigation Measures

4.1.1 Haulage Routes and Turn Restrictions

During BTT operation, heavy vehicles (Waste Collection) will be advised that access to the BTT site is from Foreshore Road (approaching the site from the south). A left turn into site is allowed 24 hours, 7 days per week. The BTT can only be accessed from Wentworth Avenue, Dension Street and Bunnerong Road (approaching the site from the north) with a right turn into the site. This access is restricted between 6am – 10am and 3pm – 7pm.

Heavy vehicles will be advised not to use Perry Street to travel to/from the site at any time.

The local haulage routes are shown below in Figure 4.1.

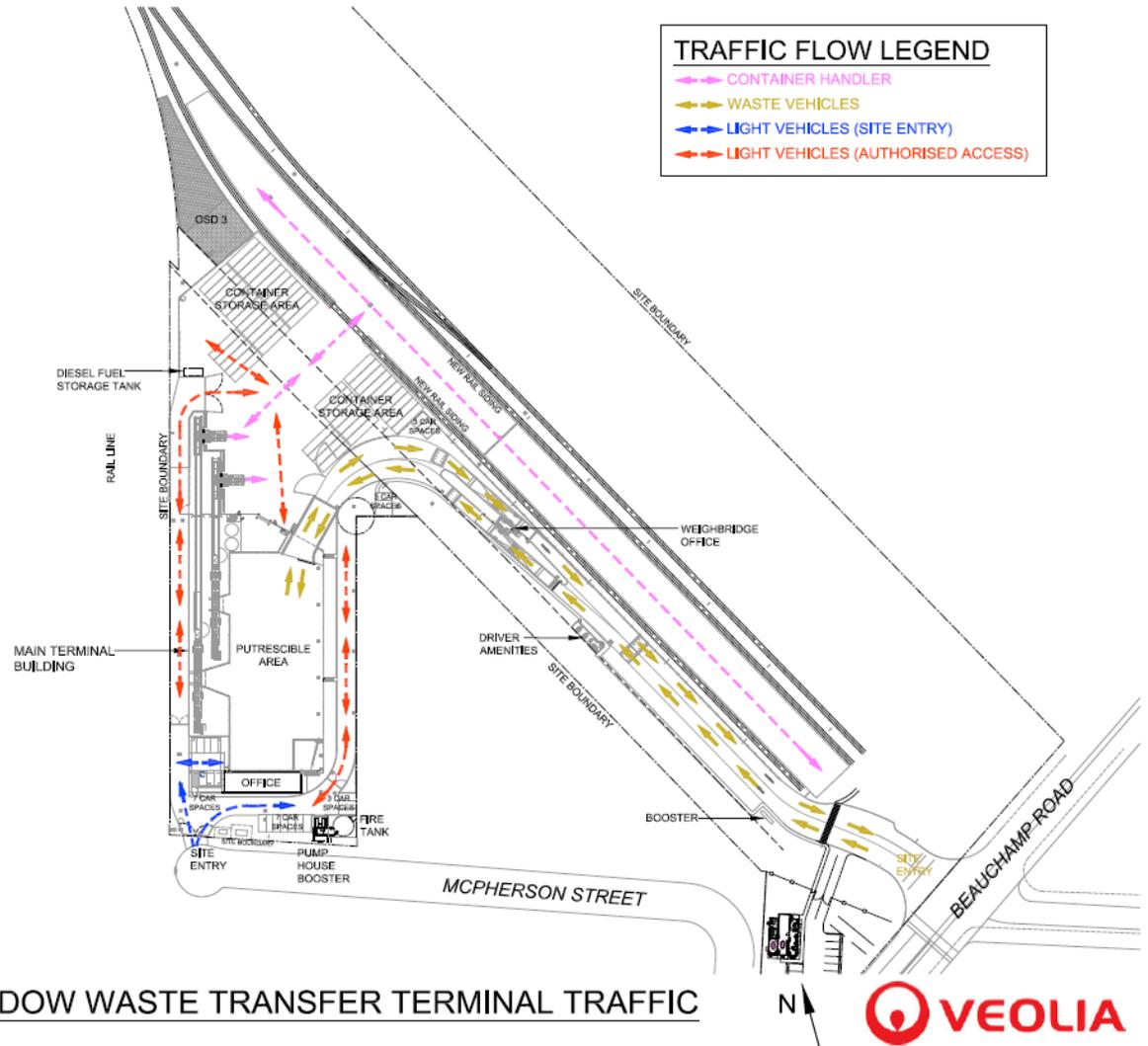


Figure 4.1 Haulage routes

4.1.2 **Onsite Traffic Route Diagram**

The onsite traffic route, shown in Figure 4.2, has been designed such that the risk of collisions and accidents between moving vehicles is minimised. Additionally the design ensures that no heavy or light vehicles on site will come into contact with waste, with the exception of the specific vehicles used for waste management. This ensures that no waste is tracked offsite onto public roads.

The BTT site access via Beauchamp Road is designated for use by Heavy Vehicles



BANKSMEADOW WASTE TRANSFER TERMINAL TRAFFIC

(Waste Collection). The BTT site access via McPherson Street is designated for light vehicles, which includes staff, contractors and visitors. There is parking provided for Heavy Vehicles and Light Vehicles as shown in the Figure 4.2.

Additionally, the use of hardstand onsite removes the risk of tracking dirt, sand and other materials onto public roads.

All turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.

Figure 4.2 Onsite BTT Traffic Routes

4.1.3 Disruptions and Queuing (Traffic Congestion Procedure)

In the event that the site becomes congested, causing the banking up of traffic beyond the Banksmeadow Transfer Terminal, the following procedure is followed:

- The Facilities Manager or Weighbridge Operator direct the relevant site personnel to assess the scope and/or cause of the congestion.
- Vehicles queued beyond the boundary are organised so as not to obstruct the traffic movements of neighbouring businesses.
- When possible, vehicles are moved onto the areas of the Banksmeadow site pending resolution of the problem.
- Should all the above measures fail to relieve congestion or resolve the problem in full causing traffic to bank to the Beauchamp Road slip lane, vehicles are directed away from the site.
- In addition, the Facilities Manager (or nominee) contacts waste transporters advising them to cease further deliveries to the site until the problem has been resolved.

This procedure ensures that any traffic congestion on Beauchamp Road or McPherson Street that is a result of traffic from the Banksmeadow Transfer Terminal is managed and cleared as efficiently as possible to overcome any impact on neighbouring businesses.

4.2 Driver Management

4.2.1 Professional Conduct

All Commercial and Municipal Heavy Vehicle Drivers must maintain a high level of professional conduct, and as a minimum:

- Adhere to posted speed limits and road signs.
- Use of the horn only as a warning device.
- Road noise impacts are minimised through measures such as driver training for limiting truck compression braking and avoiding use of engine brakes in residential areas. This is detailed further in the Noise and Vibration Management Plan (NVMP) which is found in the OEMP Appendix D5.
- All vehicles to be wholly contained on site before being required to stop
- All loads are to be covered when leaving the site.
- All vehicles are to be loaded and unloaded only so-site
- Allow enough room between vehicles.
- Respect and be watchful for pedestrians and other drivers on the dedicated transport routes
- Follow instructions given by Police, Road and Traffic Authority (RTA) and other authorities.

4.2.2 Workplace Safety

Veolia has the responsibility to ensure that everything reasonably practicable is carried out to reduce the potential risk of injury and environmental harm, to employees, contractors, subcontractors and visitors. All employees, contractors and visitors have a duty to act in a responsible manner and to carry out works in such a way as to prevent injury to themselves and others and also to prevent environmental harm.

All accidents and incidents must be reported and recorded on site, including environmental incidents and all accidents (including environmental accidents) must be reported to the Site Management as soon as practicably possible.

4.2.3 Drivers Licence Requirements

All Commercial and Municipal Heavy Vehicle Drivers must have the appropriate RTA Drivers Licences. All Commercial and Municipal Heavy Vehicle Drivers must keep their Drivers Licence with them at all times and make it available to Veolia Management and relevant authorities upon request.

4.2.4 Drug and Alcohol Policy

A Drug and Alcohol Policy (Policy) has been developed as part of Veolia's Integrated Management System. Under this Policy, it is the responsibility of each employee, contractor and visitor to the site, to ensure that they are not, by consumption of alcohol and or drugs, in such a state as to endanger their own safety at work or the safety of any other person at work.

The Veolia Drug and Alcohol Policy acknowledges that as part of its obligation to provide a safe and healthy working environment; it must address the impact in the workplace of drugs, medication and alcohol on other workers and the public.

A Fitness for Work Procedure (Procedure) applies to all of Veolia's NSW sites, and requires that all employees, contractors and visitors to the site acknowledge that they may be randomly selected to undergo a drug and alcohol test in accordance this Plan.

4.2.5 Driver Training

A comprehensive training plan has been developed for the BTT based on a Veolia standard that requires corporate/site specific inductions, competency based licencing requirements for operators, administrative, risk and emergency response training. This is described in Section 4.2 of the OEMP.

All Commercial and Municipal Heavy Vehicle Drivers are required to be inducted prior to entering the site. The induction covers all the site rules, weighbridge usage and site transport management procedures.

SECTION 5 TRAFFIC MONITORING AND REPORTING

5.1 Monitoring Program

Inspection and monitoring during the operational phase of the BTT will be kept on Veolia’s document management system. This will ensure that all monitoring activities will assist to measure the effectiveness of the traffic control measures implemented at the BTT.

The measures detailed in Table 5.1 are employed to monitor and record the movement of vehicles accessing the site and adherence to the code of conduct:

Veolia uses monitoring data to review and identify any exceedances against the adapted goals with the appropriate corrective actions applied as discussed below.

Details of compliance reporting requirements are provided in Section 5.1.2 of the OEMP.

Table 5.1 TMP Monitoring Program

Parameter	Monitoring Required	Frequency	Standard	Criteria/ Performance Measure/Trigger	Response
Onsite Truck routes	Spot Monitoring	Weekly	See Figure 4.2	Onsite blockages or disturbance	Follow up with driver Review of procedures
Traffic Flow	Congestion	As Required		Complaints Detection	Respond according to result. See Section 4.1.3
Driver Management	Spot Monitoring	Ongoing on a case by case basis		Complaints Detection	Review of procedures and operations Follow up with driver

5.2 Performance Reporting and Review

Annual management reviews of the environmental performance of the BTT will assess the continuing suitability, adequacy and effectiveness of the on-site environmental management measures implemented. This review will include performance against the goals of the TMP.

Where performance reporting is required under the Consent Conditions or EPL, all relevant information will be recorded and maintained on site. This will include, but not be limited to, the following:

- Sampling dates, times and name of sampler;
- Chain of Custody, analysis and results;
- Complaints received and corrective actions taken; and
- Copy of the EPL, development consent and other relevant approvals.

Veolia will use monitoring data to review and identify any exceedances against the adapted goals with the appropriate corrective actions applied as discussed below.

Details of compliance reporting requirements are provided in Section 5.1.2 of the OEMP.

5.3 Exceedances and Corrective Actions

Handling of any traffic complaints will be managed in accordance with the process outlined in Section 4.3.4 of the OEMP. The Facility Manager, or their site nominee, will record and manage all complaints in accordance with Veolia's complaints handling, notification and reporting procedures.

Any traffic related incidents will be managed in accordance with Veolia's Non Conformance Procedure (PRO-COL-000-137). Investigations will be undertaken in accordance with the NSW Incident Investigation Procedure (PRO-NSW-000-130) or on a case by case basis depending on the severity of the incident as described Section 5.1.1 of the OEMP.

Notification, emergency response and reporting requirements relating to incidents are detailed in Section 4.4 of the OEMP.

At completion of any investigation, any corrective actions required will be recorded in the Vault and managed in accordance with the NSW Corrective Action Procedure (PRO-NSW-000-132) in a timely manner as described in Section 5.1.1 of OEMP.

5.4 Publishing of Monitoring Data

Where required, Veolia publishes the results of any environmental monitoring required under the EPL on the following website:

<http://www.veolia.com.au/sustainable-solutions/environmental-compliance/nsw-environmental-monitoring-data>

