

The Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2000

November 27, 2015

ian.shenton@holcim.com

RE: SSI 6878 - Albion Park Rail Bypass Project (RMS)

Dear Madam,

Please find enclosed a submission on the RMS Albion Park Rail Bypass Project on behalf of Holcim (Australia) Pty Ltd (Holcim Australia). The EIS supporting the Project application has been on public exhibition, with the period concluding Friday 27 November 2015.

OVERVIEW

Holcim Australia is the owner and operator of the Albion Park Quarry, an existing hard rock quarry located on Woollybutt Drive, Albion Park Rail, New South Wales (NSW). In addition to the quarrying operations the site also operates a concrete batching plant. The location of the site is shown in Figure 1. Albion Park Quarry is located within the Shellharbour LGA, with the existing site occupying an area of approximately 630 hectares within the foothills of the Illawarra Range. The site has been in operation since 1963 and has approval to operate 24 hours a day, 7 days a week and provides a mixed range of aggregate products to the local and regional market. The site has approval to extract and sell up to 2 million tonnes of material per annum. The batching plant operates to the same parameters as the quarry and supplies ready-mix concrete to the local market.

The site is regularly accessed by a number of heavy and light vehicles associated with product delivery to and from the site, and employee/contractor transport. Existing traffic accesses the site via the East West Link and the Princes Highway. Access from the East West Link to Woollybutt Drive is via a round-a-bout which is suitable for use by heavy vehicles. The site does not experience any issues with the current access arrangement. It should be noted that the round-a-bout adequately caters for all traffic movement to and from the site.

All site traffic enters and exits through one entrance. Both quarry and concrete operations intersect and utilise the Woollybutt Drive round-a-bout to access the marketplace. Quarry traffic (heavy vehicle) passes over a weighbridge before exiting the site. The current access allows for a bank of 3 heavy vehicles between the Woollybutt Drive round-a-bout and the site weighbridge. This allows for smooth transition between weighing/ticketing of heavy vehicles and exit from the site.

HOLCIM TRAFFIC VOLUMES

Traffic movements from the site constitute both light and heavy vehicles. Movements are based on production volumes for quarry and concrete batching operations, and associated support (ie - employee movements,

contractor deliveries). Quarry movements are associated to employee and contractor transport (light), product sales (heavy) and contractors (heavy). Concrete batch plant movements are associated to employee and contractor transport (light), product sales (concrete agitators - heavy), product delivery (cement/flyash tankers and truck and dogs - heavy) and contractors (heavy). A breakdown of peak traffic volumes is provided in Table 1.

Table 1: Holcim Albion Park - Peak Daily Traffic Movements (In + Out)

	QUARRY	CONCRETE	TOTAL
HEAVY	500	130	630
LIGHT	140	10	150
TOTAL	640	140	780

Figure 1: Holcim Albion Park - Site Entrance Layout



ALBION PARK RAIL BYPASS - ENVIRONMENTAL IMPACT STATEMENT

The Environmental Impact Statement (EIS) for the Albion Park Rail Bypass Project (the Project) gives minimal consideration to the Holcim Albion Park operations. The future movement of trucks (quarry only) is stated as an issue for consideration due to the removal of the existing East West Link.

It should be noted that the EIS makes reference to the Illawarra Regional Growth and Infrastructure Plan, in which the Dunmore - Shellharbour Hills hard rock resources are detailed for their importance to the regional and Sydney construction markets.

The impact of the Project on Holcim's quarrying operations is described as partial, focusing on the following areas:

- Conversion of quarry land in to a transport corridor; and
- Slight impact to access roads.

It is stated that quarry operations will not be impacted by the Project. Access to the site would be via a new service road replacing the existing East West Link. It is stated (EIS, p 407):

"All quarry trucks would therefore be able to move between the quarries and the Oak Flats Interchange using this road. It is not anticipated that the project would therefore have any substantial social or economic impact on quarrying in the area."

The 2014 traffic study conducted in support of the EIS identified roughly 15,000 vehicles per day on average. BY 2041, it is anticipated that the bypass will reduce traffic volumes along the East West Link and Tongarra Road by 54%. No data was provided on the scale of traffic reduction along the East West Link.

Project Details - East West Link Changes (EIS Technical Paper 1 - Traffic and Transport)

The existing East West Link is proposed to be removed and replaced by a new road about 25 metres to the south of the bypass motorway to become the new (proposed) East West Link. The new road would have one lane in each direction. A new intersection is proposed to provide an access point for the Holcim site. The proposed intersection layout for both quarry access points would consist of channelized right turn with 110 metre turning lane and an auxiliary left turn with deceleration lane of 50 metres. The existing round-a-bout is proposed to be replaced with a T intersection, controlled by signage. It could not be determined if pedestrian and/or cycle paths were detailed in the proposal.

The justification for the intersection change is based upon the following estimated quarry trip generation figures (Traffic & Transport Assessment, p 125):

	AM Peak		PM Peak		Total Movements
	In	Out	In	Out	
Cleary Bros Quarry	54	45	35	61	195
Holcim Quarry	30	23	26	35	114

Cleary Brothers trip figures are based upon a Traffic Impact Assessment undertaken in 2012 (GTA Consultants), supporting a proposed increased to annual production levels. No source is detailed for movements associated to the Holcim site. No detail was supplied as to whether the movements were associated to heavy or light vehicles, nor whether or not movements associated with the concrete batching plant have been considered.

HOLCIM RESPONSE TO PROPOSED CHANGES

Holcim observes that RMS have grossly underestimated the number of movements associated to peak operation of the Albion Park site (quarry and concrete batching operations). It appears as though assumptions have been made with regard to traffic movement, with no consultation or information sought by RMS, from Holcim. The proposed changes to the East West Link and the Holcim intersection with this roadway (the only access point for supply of products to the market) are based on these figures.

Consequently, Holcim are of the opinion that the proposed changes will not adequately cater for future operations and vehicle movements to and from the site. The proposed changes will have an impact on:

1. Integration of site traffic with public movements along the proposed new East West Link.
2. Ability to transport products from the site at required peak volumes (ie - sales requirements).
3. Ability for the site to weigh and dispatch trucks.

1. Traffic Integration

Holcim believes that the proposed T intersection does not give adequate consideration to the integration of site traffic (quarry and concrete) with future road use. Movements to and from the site have been severely under-estimated (114 V 780), thus bringing in to question the ability of the proposed intersection to cater for site traffic. In addition, no data could be found on required lead times for fully-laden heavy vehicles merging with other vehicles. An acceleration lane has not been mentioned. Holcim is concerned that heavy vehicles exiting the site would encounter substantial waiting times before departing the T intersection and merging with other road users.

2. Peak Movements

Movements from the site (ie - laden heavy vehicles) during peak hours would be severely impacted by the T intersection proposal. It is anticipated that wait times would be substantial. Holcim is concerned about the flow-on effect this would have to site operations - effectively 'banking' vehicles up before they could exit the site. Given the proposed East West route would consume roughly 25 metres of existing buffer between the site weighbridge and the existing round-a-bout, ability for trucks to queue prior to departure would be removed.

3. Heavy Vehicle Ticketing

The location of the proposed East West route would jeopardise the functionality of the site weighbridge. By removing ability for trucks to queue (following ticketing) prior to departure, the use of the weighbridge would effectively be controlled by the ability for heavy vehicles to depart the site in a timely manner. Holcim does not consider this to be an acceptable impact from the Project.

Summary

The Holcim Albion Park site is a regionally significant resource and must be protected. The inadequate design of the proposed intersection (between the site and East West Link replacement) to cater for site movements, leading to lengthy wait times for exiting vehicles, seriously jeopardises the operation of the Holcim site. Holcim does not consider the proposed changes to be acceptable to their operations and objects to the Project proposal, in it's current form. Current access arrangements for the site (ie - round-a-bout) should not be jeopardised by the Project. Any impacts to functionality of operations must also be mitigated, ie - relocation of site weighbridge to allow for continued operations.

Additionally, no pedestrian or cycle paths should be located along the same side of the road network as the Holcim site.

In it's current state, the Project proposal is considered to have potential for substantial economic (operational

NSW/ACT



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and sales restrictions) impact to the site.

Should you have any questions regarding this submission please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Shenton', written in a cursive style.

Ian Shenton

Planning & Environment Manager - NSW/ACT