

Reference: 22/8451  
Contact: Susan Appleyard

Major Projects  
Department of Planning and Environment

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Dear Carl

### **Howlong Sand and Gravel Quarry Expansion(SSD-8804) Response to Additional Information.**

Federation Council officers have reviewed the additional information provided and still have concerns regarding the proposal:

#### **1. Flooding Impacts on Assets and Neighbouring Properties**

Council are still concerned about the impact on neighbouring properties. The Letter from Water Technology dated 17 November 2021 states (Appendix 8):

*"A more detailed and targeted impact assessment is required to effectively determine the level of flood impact on upstream properties, assets and infrastructure caused by the proposed levee development."*

The township of Howlong is impacted by overland flows and there is concern that by providing the additional levee there may be an increase to overall flows. The information provided does not address the overland flow and potential increased impact on the township of Howlong.

If the authority is to consent to the application it is requested that the more detailed impact assessment be undertaken to ensure that there is no adverse impact on the neighbouring properties and on the Riverina Highway prior to works commencing on the site.

#### **2. Flooding - Site Access**

The access road is impacted by flood water without the levee being in place. No details have been provided as to whether the access is to be all weather or dry weather only.

Given that the access will be inundated on a regular basis over the operational life of the quarry it is recommended that the access be defined as a dry weather access only and that the condition of the access is to be monitored during storm and flood events to ensure access and egress of staff and vehicles can be maintained. This should also be included in any emergency response plan for the Quarry Site.

### 3. Traffic Impact Assessment

No updated TIA provided with additional information, only a review of the existing data was undertaken. Council is concerned about the impact on the safety of pedestrians and light vehicles in the centre of Howlong and on the regional roads required to be maintained by Federation Council, Sturt Street and River Road. The following two statements from the additional information highlight the limited focus of the study and the impacts the vehicle movements will have on the township of Howlong in particular.

Page 42, the additional information reads:

*2. Council's comments refer to an additional 80 heavy vehicle movements per day and additional workforce of eight to ten persons. However, it is noted that existing activities feature an average of 10 heavy vehicle movements per day and currently employs a maximum of eight people. Therefore, the change in traffic levels is not as great as anticipated.*

This does not take into account heavy vehicle movements required for the farm operations on the site and indicates a 4 fold increase in heavy vehicle movements for the quarry operation on its own per day.

Page 82:

*It is important to acknowledge that the Riverina Highway is a State Highway. These routes are managed and maintained by the NSW State Government in Recognition of their importance for regional transportation activities such as freight and in the case of the Quarry, the movement of construction material.*

This statement does not acknowledge that Riverina Highway is owned by council and that the areas in the road reserve outside the fog lines are maintained by Council. Council are to ensure the safety of all road users from pedestrians through to heavy vehicles.

Information provided:

- After consultation with TfNSW the limit of 10 vehicle movements per hour has been defined for the site. (Various Pages)
- The traffic assessment has been undertaken that all heavy vehicles will access the site from the west. (Appendix 12, page 1 Letter ttp dated 4 September 2021)
- "...a cap of 40 laden truck departures would be observed. (Appendix 12, page 2 Letter ttp dated 4 September 2021)
- The Peak 6 laden truck departures could therefore occur over six hours per day not 15 hours. (Appendix 12, page 2 Letter ttp dated 4 September 2021)

Given the inconsistency outlined in the above points Council request that the number of laden trucks be limited to 5 per hour over a period of 8 hours from 7am to 5pm Monday to Friday to ensure the proposed access upgrade is suitable of the number of heavy vehicles exiting the site from Riverina Highway to cater for not only quarry traffic but farm operations traffic as well.

To ensure traffic limits are being adhered to the Council request a maintained traffic counter be installed at the entrance gate to the site and that the data is provided to Council and Transport for NSW on request.

All weighbridge records are also to be made available to Council on an annual basis.

A Haulage Movement Plan for material leaving the quarry must be provided for movements exceeding 10 individual heavy vehicle movements per day. Any adjustment to the haul routes must be submitted to Council prior to the change of haul routes.

Maximum allowable material to be extracted per annum 300,000 tonne. Detailed Annual Survey of the site is to be provided to Council and the state to ensure compliance with the limitation of materials moved.

#### **4. Impact on Council maintained infrastructure:**

The report outlines there will be an increase in heavy vehicle traffic movement in Sturt Street and by extension River Street of 14.5%. This will increase the amount of maintenance required to these regional roads. Council would like to negotiate an annual contribution towards the maintenance of Sturt Street from Hawkins Street to the River Street to the south. And for all of River Street from its most northern point to the Victoria Border. The contribution would be based on the tonnage of material carted along the Sturt Street and River Street Haulage Route.

If additional haulage routes are identified in the Haulage Movement Plan it is also requested that these local and regional roads be included in any negotiations. Federation Council would recommend the utilisation of a voluntary planning agreement in accordance with Section 7.4 Planning Agreements of the Environmental Planning and Assessment Act 1979.

#### **5. Amenity Impact**

Given the increase of daily heavy vehicle movements within the urban centre of Howlong, which includes the commercial core and a public school as well as residential areas it is requested that a driver code of practice be established as outlined in the additional information and that any trucks hauling material from the site be clearly definable as Howlong Sand and Gravel Trucks and a complaints register is to be established and maintained by operator of the site.

The operator shall nominate a contact person and telephone number for the benefit of the Howlong Community and establish a complaints register that includes records of nature, time and date of complaint, climatic conditions such as wind direction and speed and the action taken to address complaint. The register shall be made available to Council upon request.

The operator shall notify all residents along Hawkins Street and Sturt Street south to River Street of the development site of the contact details and associated information.

#### **6. Other conditions:**

- Potable water supply is to be provided for the workers onsite.
- Waste Management Plan is to be prepared and provided to the Consent authority prior to works commencing

- Emergency Management Plan is to be prepared and in place prior to works commencing on site.
- Onsite Waste Management System - A report on the system to be provided to council prior to operations commencing indicating if upgrade works are required to the existing onsite system for any likely increase in effluent generated. If upgrades are required a section 68 approval is to be sought from Council. The system due to its location is defined as high risk and is to be assessed by a suitably qualified person and a report provided to council on its condition on a bi-annual basis
- Details of any Ancillary Structures proposed on the site, i.e. staff facilities or machinery shed, storage sheds; are to be provided to Council prior to works commencing on site to determine if separate local approvals are required for the structures.
- Fuel – fuel to be located on farm – Council to be consulted prior to placement of fuel infrastructure on the farm to determine the site is suitable for the location of the fuel and to define what approvals are required.

If you require further information please contact me on 02 6033 8999.

Yours Sincerely

**SUSAN APPLEYARD**  
**DIRECTOR DEVELOPMENT AND ENVIRONMENT**