

Reference: SSD8804
Contact: Susan Appleyard

19 May 2020

Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001
Attention: Joel Herbert
Joel.Herbert@planning.nsw.gov.au

Dear Joel

State Significant Development 8804 – Expansion of Howlong Sand and Gravel – Request for additional information and clarification.

Council has reviewed the documentation for the proposed development outlined above, and note that there is the potential for an adverse impact on the community of Howlong from the following factors, as a brief summary –

- Increased traffic movements through the centre of the town potentially affecting the amenity and safety of the residential and commercial areas of the town;
- Increased risk of pollution to the river Murray and therefore of the towns offtake for the reticulated water supply;
- The impact of the proposed levee on the behaviour of floods and the impact of this on surrounding properties.

The Council also notes that the proposal is of economic benefit not only to the community of Howlong, but to the entire community within Federation Council and a number of areas in NSW and Victoria for the provision of raw materials required for infrastructure and construction projects.

Federation council is requesting additional information prior to providing any draft conditions of consent in the event an approval is issued.

At the 19 May 2020 Federation Council meeting, delegation was given to the Director of Development and Environmental Services, Ms Susan Appleyard, to review the additional information requested as outlined in the following and to prepare draft conditions of consent in conjunction with the Department of Planning, Industry and Environment in relation to the concerns outlined in this submission, in the event that an approval is granted.

To discuss any of the matters raised in this submission please contact Susan Appleyard on 02 6033 8999.

Yours Sincerely

ADRIAN BUTLER
GENERAL MANAGER

ADDITIONAL INFORMATION REQUESTED

1. Impact on amenity and safety, from truck movements through the centre of Howlong and validity of the traffic impact assessment. Clarification and review of the data used in the report is requested to ensure that the information is accurate and the defined intersection assessments are suitable for the increased traffic volumes.

The assessment provided indicates that the increase of heavy vehicles movements will increase by 80 a day and that the road system is adequate to cater for the increased traffic movements. Transport for NSW will be assessing the networks capacity. Council's concerns are in relation to the impact on the amenity of Howlong and the residential areas in particular, and the impact on safety, in Hawkins Street in particular, with the current angle parking, meaning people reverse out already into a busy road at times. There is no width for a parking/entry lane to the main traffic. Council also has concerns with the accuracy of the traffic study undertaken.

The Road Transport Assessment by R.W. Corkey & Co Pty Limited dated 2 March 2020, states

From the study undertaken in March 2012 the daily average vehicles accessing the site, were 42 vehicles on a weekday with 9 being heavy vehicles (33 being light vehicles). Under section 4.1 the project has assumed, for the purpose of this assessment that there will be 26 light vehicle trips per day and 80 heavy vehicle trips per day. Based on the base line studies, the number of light vehicles entering and exiting the site is reducing by 7 light vehicle movements, even with an increasing work force of 8-10 .

Also in the base line data outlined in table 4.3, the growth with no project is far below what has been recorded for access at the site.

Further clarification on the number of vehicle movements and percentage of heavy and light vehicles is requested, as is further work on the movements of existing vehicles in Hawkins Street, around the compact, yet busy, e.g. Saturday mornings, Howlong Central Business District.

The hours of heavy vehicle movement is of particular concern to the council with heavy vehicle traffic movements to be between the hours of 6.30am and 10.00pm. The impact on the amenity of the residential areas with frontages to the Riverina Highway, Hawkins Street and Sturt Street is of particular concern. In accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment (Noise Control) Regulation 2017, the noise emanating from the heavy vehicles is to comply. The limiting of engine brakes and other loud operational noise from the heavy vehicles is to be limited in the urban areas of Howlong to maintain the amenity of the town.

There are other areas where further clarification is sought includes:

- Width of the access road to the site, noted in the study as being 12m wide but measured at the entrance from Riverina Highway as being 6m wide.
- The data assumptions and base line figures.
- The updated figures and the impact on the treatments for the access and egress points for the site, and the corner of Hawkins Street, Riverina Highway and Sturt Street Howlong.
- Adequacy and safety of the bridge over the Black Swan Creek.
- The impact of light on drivers entering and exiting the site due to the east west orientation of the access point.

2. Details on the impact the proposed levee for stage 4 will have on the flood patterns on properties surrounding the site, vehicle access to the site and overland flows.

The proposal includes the construction of a levee to a maximum height of 2.7 or 147m AHD around stage 4 of the proposal. The study undertaken on the impact of the levee on flood flows only addresses the impact and protection of the operational area of the site.

The documentation states that the impact on floodwaters to the east will be for 4km at a height ranging from 300mm to 5mm, however it does not address if this effects on the Riverina Highway, the access to the site, neighbouring properties or other infrastructure on neighbouring properties. Council requests that additional information regarding the impact on flood waters be provided for both upstream and downstream of the site, and that such information includes the overland flow changes that will be caused by the construction of the levee.

3. Further details regarding the impact on water quality in the River Murray and the pollution controls that will be employed for the life of the project.

The application is attempting to make the system closed to the remainder of the River Murray System, however the site is located between the main channel of the Murray River and an anabranch – Black Swan Anabranch.

Council request details regarding the additional pollution controls that should be employed during the life of the project. This information is requested to ensure that the water quality is maintained for the health of the aquatic habitat and for the town of Howlong's water supply.

4. Details regarding the proposed bushfire protection measures that will be in place for the life of the development.

The land is defined as bushfire prone and is only accessible via one access road and bridge. The bush fire assessment again only defined the impact on the site itself. Details of the proposed Bushfire protection measures that will be employed on-site are to be provided for assessment.

5. Details regarding the effect the re- use of the water used in the processing for irrigation on the land capability and the areas where the re-use irrigation water will be applied.

The document states that the water utilised in the processing of the material will be used for irrigation purposes on the site and other sites. There is no detail on the other sites provided and no land capability details regarding the land to be irrigated with this water. Additional information is requested regarding the sites to be irrigated and the land capability, to ensure that the reuse of this water does not adversely impact on land within the Riverine Environment, and that the recharge to the river system will not adversely impact on the river system in the vicinity of the areas irrigated.

6. Details of the Emergency Management Plan for the overall development.

The site is located essentially on an island within the River Murray System. The site is classified as Flood Prone, Bushfire prone, and with hydrocarbons (fuel) being stored on site, there is an increased risk of pollution to the River Murray system. It is therefore requested that an emergency management plan be developed and approved prior to works commencing on site to address at a minimum, the site's emergency response to the following events:

- Flooding
- Bushfire
- Pollution incident

- Evacuation of the site for all emergencies
- Failure of the onsite sewerage Management System onsite
- Bridge Failure

Council requests a copy of the plan prior to the application being approved.

7. Compliance with Building Code of Australia and relevant Australian Standards for services, structure and employee facilities on site.

The increase in operations on the site means that additional amenities and facilities will be required for the workers on site. Approvals for these works and structures are to be sought from Federation Council prior to operations commencing.

8. Rehabilitation plan and future use of the site.

The Environmental Impact Statement outlines that the site will be rehabilitated and make up part of the aquatic habitat of the River Murray, however measures of how the site will be rehabilitated has not been provided in any sufficient detail. Prior to works commencing it is requested that an agreement be created and tied to the title of the property requiring the rehabilitation of the site as an aquatic habitat at the cessation of the project, and that the state government hold a bond for the rehabilitation works to ensure that the rehabilitation works are undertaken to a suitable standard.

9. Upgrade and operation of septic system

A review of council's records indicates that there is an onsite sewerage management system on site for the property. Given the likely increase in vehicle movements and employee numbers, a review of the current onsite sewage management system is to be undertaken to ascertain whether it has the capacity to treat the additional wastewater loads from the development or whether an upgrade to the system will be required. The review is to be undertaken by a suitably qualified person and a report of the findings provided to Council. If any upgrades to the system are required, these are required to be undertaken prior to any works commencing.

10. Details regarding the erosion and sediment controls that will be utilised for all stages of the development.

Given the nature of the works on site a detailed erosion and sediment control plan is required for the site for the life of the project.

11. Details regarding the waste management plan for the site.

With the increased staffing and vehicle movements to the site the increase in waste generated from the site needs to be addressed. It is therefore requested that a waste management plan be prepared and approved by the Department of Planning, Industry and Environment, Environmental Protection Authority and Federation Council prior to the commencement of operations.

12. Federation Council's Developer Levy

The levy payable will be calculated at 1% of the capital value of the construction works for the overall development. The levy based on the capital value for the project of \$5.1 million will be \$51,000. Please note all contributions will be payable prior to the approval being enacted.