

PCU079608

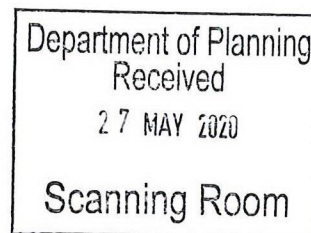
Mr Leigh Ashford
"The Mill"
PO Box 41
HOWLONG NSW 2643

0490 705 342
lwa25159@gmail.com

21 May 2020

Mr Joel Herbert
Locked Bag 5022
PARRAMATTA NSW 2124

joel.herbert@planning.nsw.gov.au



Dear Sir

OBJECTION TO SSD 17-8804
HOWLONG SAND AND GRAVEL EXPANSION PROJECT

INTRODUCTION

I am a long term resident and residential property owner at 7 Ashford Road, Howlong. This location is on the proposed transport route for the development. The house has been in the family for the last 120 years. Originally having a property adjacent to a highway was a significant benefit. Now it is a curse. The rapid increase in heavy transport over the last 20 years without any effective desire to, or control by government, to limit road noise and heavy vehicle noise has seen the amenity of the area significantly reduced. The large increase in traffic has seen road safety compromised and threatened. This proposed development appears to create additional threats to the environment, safety and the livability of the town of Howlong.

There are many documents related to the development which are on public exhibition. My comments will only relate to the two which I believe immediately affect our family. Unfortunately I do not have the knowledge, resources or time to adequately review and comment about some of the other technical documents.

SOCIAL LICENCE

I do not believe that this development has a social licence to operate in its current form. The development will have adverse effects on our family's health and amenity as well as that of residents of over 100 properties directly abutting the transport routes.

Residents question why a development to the east of Howlong has a transport route west through Howlong to access Albury-Wodonga, instead of directly east to Albury. The commonly held view by residents of this area is that the proponent and government are prepared to sacrifice the town of Howlong for additional profit and the commercial and community benefits to Albury-Wodonga.

It is considered that the proposal should have properly considered the removal of the barriers and blockages affecting direct access to Albury as part of the assessment and not just dismissed them outright. As an example, I find it difficult to fathom why a different vehicle configuration, that would conform with current Transport for NSW restrictions, could not be used to access Albury directly.

ENVIRONMENTAL HAZARDS TO TRAFFIC

This area along the Murray River is particularly susceptible to thick fogs. Our experience over many decades is that fogs affect the area for approximately 20 days per year. Most fogs lift at about 10.30am but on one or two occasions annually, do not lift until mid-afternoon.

Site distance is often less than 50m.

Entry onto the Riverina Highway during fog periods is fraught with danger. We have developed strategies over the years to reduce the risk of a motor vehicle crash. We warn visitors of the dangers of accessing the highway during these times. Hearing becomes critical on identifying approaching traffic.

The Riverina Highway west of Albury is also notorious for very poor visibility at low sun angles. I am aware of a three car motor vehicle crash near our property, less than 2 years ago. Poor visibility due to the setting sun was the primary cause of the rear end crash.

The media have recently reported another rear end accident on the Riverina Highway west of Albury in late afternoon.

Besides the intersection of Ashford Road and the Riverina Highway, there are 15 other intersections along the proposed transport route through Howlong. They are all affected by fog and 10 affected by low sun angles.

The traffic study does not address the adverse environmental conditions of fog and low sun angle issues, at all. I believe this oversight will result in regular annual rear end motor vehicle crashes if the project is approved. The traffic study needs to be revised to address these risks and recommend appropriate strategies to eliminate the risk.

ROAD CROSSINGS AND COMMUNITY FACILITIES

The traffic study makes no comment about the 16 intersections along the transport route. The Ashford Road, Riverina Highway intersection adjacent to our property, does not have any road safety treatments and has been the site of motor vehicle crashes over the years. The Traffic Study should address the impact of the proposed 20% increase of heavy vehicles on the serviceability and safety of these intersections.

The Traffic study also does not address the impact of a 20% increase of heavy vehicles on safety, around the Howlong Public School, access and egress of Lowe Square, Howlong Childcare Centre and Oolong Residential Care Home.

HAUL ROAD LIGHT VEHICLE NUMBERS

The calculated light vehicle movements using the haul road, from the quarry to the Riverina Highway intersection does not appear to mirror reality.

The figures provided show a reduction in light vehicle traffic from the current background traffic figures. Logic suggests that the light vehicles generated by the development should be added to the background levels.

The traffic study needs to reassess the light vehicle numbers. This is important as it has an effect on the type of treatment required at the haul road, Riverina Highway intersection. Alternatively, controls should be implemented to ensure the traffic numbers do not exceed the identified limits.

STARTING TIME

The report makes the presumption that it is acceptable that heavy vehicles are able to commence at 6.30am because that is how they operate now. This is not acceptable and the site should not be receiving heavy vehicles until 7.00am at the earliest.

VIBRATION

Our dwelling vibrates in certain conditions when heavy vehicles pass. This is generally in summer when conditions are dry. It is expected that the 20% increase in heavy vehicles will increase the amount of vibration through the house to an unacceptable level.

NOISE

Road traffic noise at our property has been an increasing annoyance and has become a serious health hazard. Having lived at this address for over 60 years, the peaceful enjoyment of our property has significantly deteriorated in the last 20 years due to traffic noise. All in the name of economic development and at a cost to local community amenity, which of course is hard to measure and cannot be effectively defined in dollars.

There are over 100 private houses which directly abut the Riverina Highway and Sturt Street from the quarry haul road. There is also a public school, child care centre, two churches, a residential care home and a retail/commercial precinct on the proposed route.

I find it incredible that the noise study findings just happen to fit the maximum levels outlined in the NSW Government Policy on road noise limits. These results are significantly less than the independent noise study carried out in 2018.

NOISE MEASUREMENT SITE NOT REPRESENTATIVE

The site chosen for the noise assessment of traffic from the haul road to Sturt Street at the Holbeach Street/ Riverina Highway intersection, is not indicative of traffic noise for any area east of Holbeach Street.

The area east of Holbeach Street is not within the 50kph zone and is a sprayed bitumen pavement and could produce different levels of noise.

INDEPENDENT NOISE STUDY

The study makes no reference to the independent noise study undertaken by GHD at our property in 2018 for RMS.

This study showed at that time, the overall daytime noise level exceeded the maximum levels outlined in the NSW Road Noise Policy on 9 of the 11 days of the study. The night time noise levels exceeded the maximum level on 3 days.

My understanding is that the perceived noise level is 14% higher than the NSW Road Noise Policy maximum level on some days.

The development will increase heavy vehicle usage of the road by over 20%. The noise study suggests that the overall noise level will increase by one decibel. In reality this further increases overall perceived noise by another 7%.

In our case the overall perceived noise level will exceed the NSW Road Noise Policy maximum from Monday to Saturday and be 21% higher for at least a quarter of every week.

These results are all very well for academics and regulators who are looking for numbers to justify decisions, but have little practical relevance or understanding to the ordinary person.

In layman speak, our reality is that the current noise levels mean that each time a heavy vehicle passes the property we are not able to hear or be heard, or to enjoy our garden. It also impacts noticeably inside our house. In our front garden, the noise meter reads at well over 80dba each time a truck goes past. Some make 90dba. The proposed development will further decrease the practical use and enjoyment of our property for another 30 to 40 minutes each day.

The noise is affecting both our physical and mental health.

The Noise Study makes no comment on the effects at the Howlong Public School, Howlong Childcare Centre or Oolong Residential Care Home. All these directly abut either the Riverina Highway or Sturt Street.

The noise study is currently inadequate and it has not addressed all the scenarios affecting the community. It has not referenced the existing independent data which shows a higher noise level than

determined in the project support documentation nor has it considered impacts on the school, child care centre and nursing home.

CONCLUSION

On the information provided I object to the approval of the proposed development. It exposes us, the residents abutting the transport route, and the Howlong community to additional significant, safety, noise and health issues. These have not been addressed nor have enforceable mitigation strategies been identified.

Yours faithfully

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

Leigh Ashford

Political donations disclosure statement



NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____

Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning and Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

Disclosure statement details				
Name of person making this disclosure LEIGH WILLIAM ASHFORD		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) SSD 8804 Howlong Sand & Gravel Expansion State Project.		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / (NO) OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION (YES) / NO				
Reportable political donations made by person making this declaration or by other relevant persons				
<i>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</i>				
<i>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</i>				
<i>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</i>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ of donation
NIL				
Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date Lf Ashford 21/5/2020				
Name(s) LEIGH WILLIAM ASHFORD				



Roads and Maritime Services

7 Ashford Road Howlong
Noise monitoring

October 2018

Table of contents

1.	Introduction.....	1
1.	Noise monitoring methodology.....	1
2.	Noise monitoring results.....	5
3.	Conclusion.....	6

Table index

Table 1	Noise monitoring details.....	2
Table 2	Noise monitoring results, dBA	5

Figure index

Figure 1	Locality map and noise monitoring location.....	4
----------	---	---

Appendices

- Appendix A – Noise monitoring charts
- Appendix B – Calibration certificate
- Appendix C – Glossary of acoustic terms

1. Introduction

The Noise Abatement Program (NAP) targets locations or lengths of existing roadways where road traffic noise levels are very high and are considered excessive for noise-sensitive land uses such as residences, schools, churches and health care institutions.

The purpose of this assessment is to conduct noise monitoring at 7 Ashford Road Howlong.

1. Noise monitoring methodology

Noise monitoring was undertaken from 21 September to 1 October 2018 at the dwelling located at 7 Ashford Road Howlong (shown in Figure 1) during a typical traffic flow period.

Noise monitoring was undertaken using a Svan SV979 sound level meter programmed to accumulate L_{Amax} , L_{Aeq} and L_{A90} noise descriptors continuously over the entire monitoring period. Details of the noise monitoring equipment are provided in Table 1. The sound level meter conforms to the requirements of Australian Standard AS 1259.2 *Sound Level Meters* and carries current NATA calibration. Calibration certificates of the noise monitoring equipment are shown in Appendix B.

Prior to deployment, a calibration check was performed on the noise monitoring equipment using a sound level calibrator with a sound pressure level of 94 dB(A) at 1 kHz. At completion of the measurements, the meter's calibration was re-checked to ensure the sensitivity of the noise monitoring equipment had not varied. The noise loggers were found to be within the acceptable tolerance of ± 0.5 dB(A).

The data collected by the logger was downloaded and analysed, and any invalid data removed. Invalid data generally refers to periods of time where average wind speeds were greater than 5 m/s (adjusted for noise logger height), or when rainfall occurred. Meteorological data was sourced from the Bureau of Meteorology weather station located at Rutherglen AWS.

All noise monitoring activities were undertaken and processed in accordance with AS 2702 *Acoustics – Methods for the Measurement of Road Traffic Noise*.

Table 1 Noise monitoring details

Noise Logger	Location
Monitoring location	7 Ashford Road Howlong
Resident (client)	Mr Leigh Ashford,
Logger Type/ Serial No.	Svan SV979 Serial 27100
Measurement started	12:30 hours, 21 September 2018
Measurement ceased	12:30 hours, 1 October 2018
Pre/Post calibration	94.00 / 94.01 dB @ 1 kHz
Freq. weighting	A
Time response	Fast
Microphone height	1.5 m from the ground
Microphone location	Free-field
Photograph 1	



Photograph 2



Noise Logger

Location

Photograph 3



Photograph 4





Figure 1 Locality map and noise monitoring location

2. Noise monitoring results

Noise parameters are summarised in Table 2 with monitoring charts of noise parameters presented in Appendix A (free-field). Note the noise monitoring parameters in Table 2 include a façade correction. Detailed descriptions of the acoustic terms can be found in Appendix C.

Table 2 Noise monitoring results, dBA

Date	Noise parameters ¹		
	L _{Aeq} (15hr)	L _{Aeq} (9hr)	L _{Aeq} (24hr)
	7 am to 10 pm	10 pm to 7 am	12 am to 12 am
Friday-21-Sep-18	61	55	60
Saturday-22-Sep-18	60	55	58
Sunday-23-Sep-18	62	54	61
Monday-24-Sep-18	61	56	59
Tuesday-25-Sep-18	61	55	60
Wednesday-26-Sep-18	61	57	60
Thursday-27-Sep-18	62	56	61
Friday-28-Sep-18	62	53	60
Saturday-29-Sep-18	60	53	58
Sunday-30-Sep-18	61	55	59
Monday-1-Oct-18	61		59
Overall	61	55	60

Note 1: Includes façade correction of 2.5 dBA

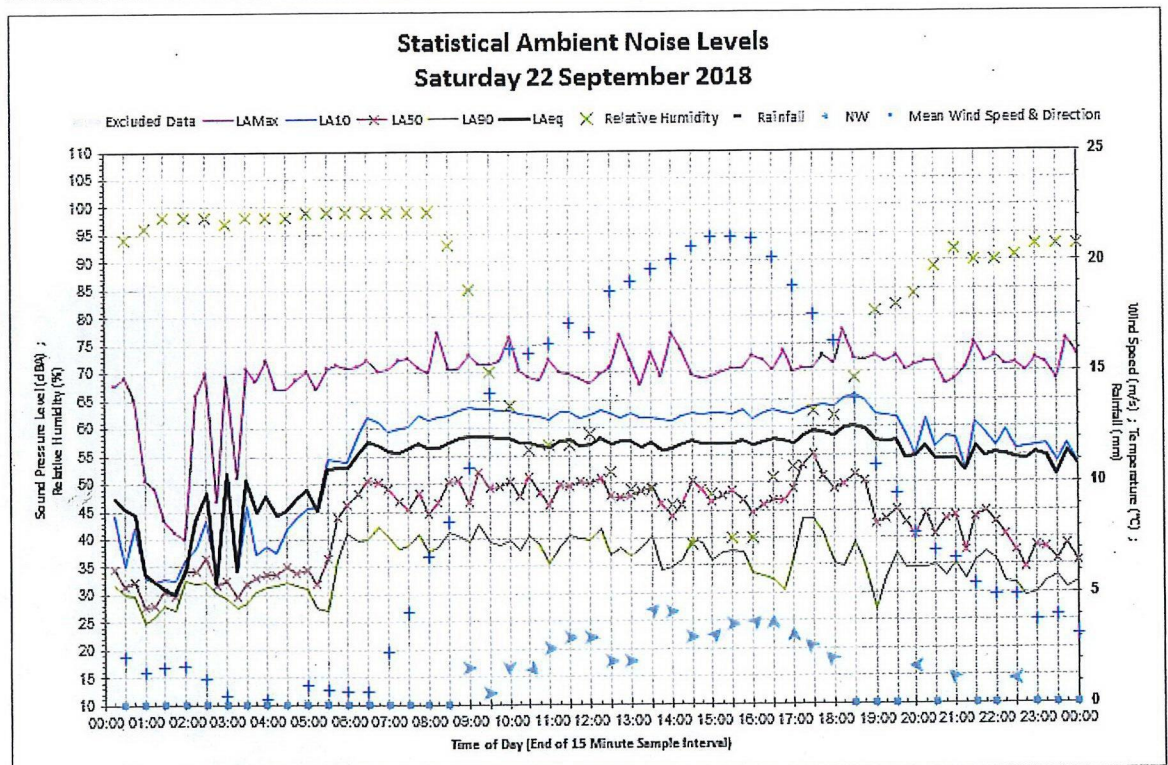
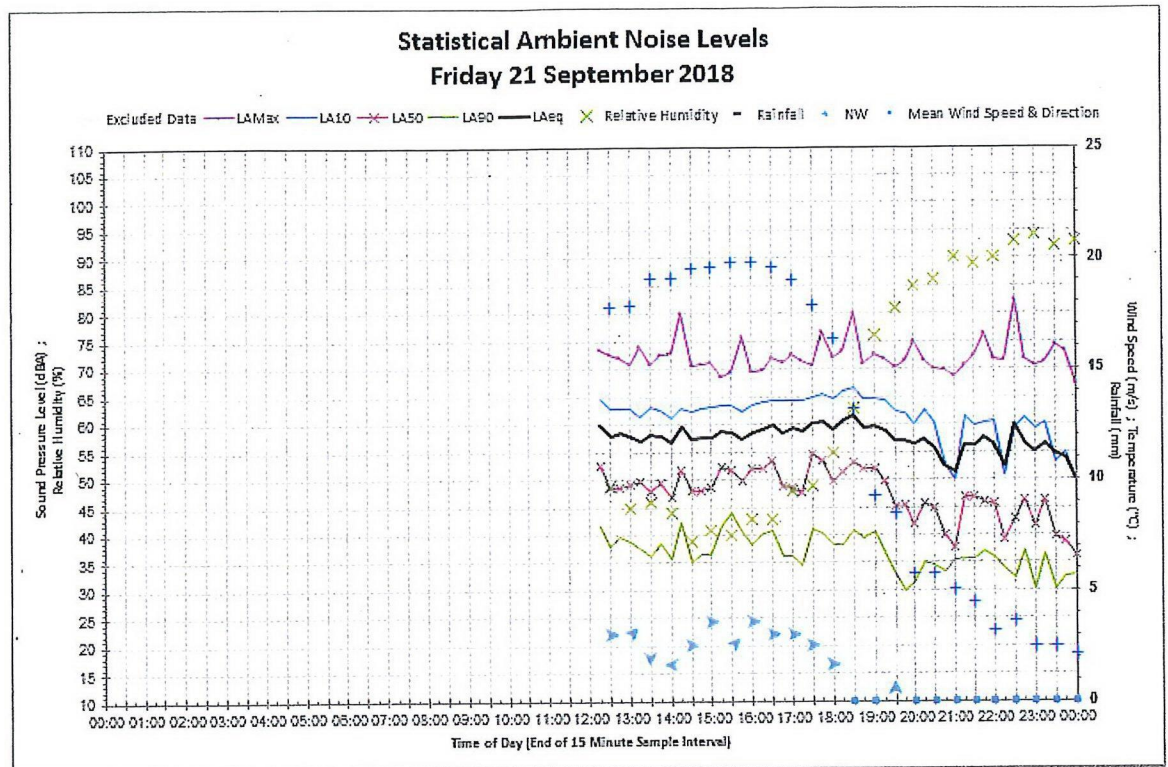
3. Conclusion

This noise monitoring assessment presents the results of the road traffic noise monitoring undertaken at the residential dwelling located at 7 Ashford Road Howlong.

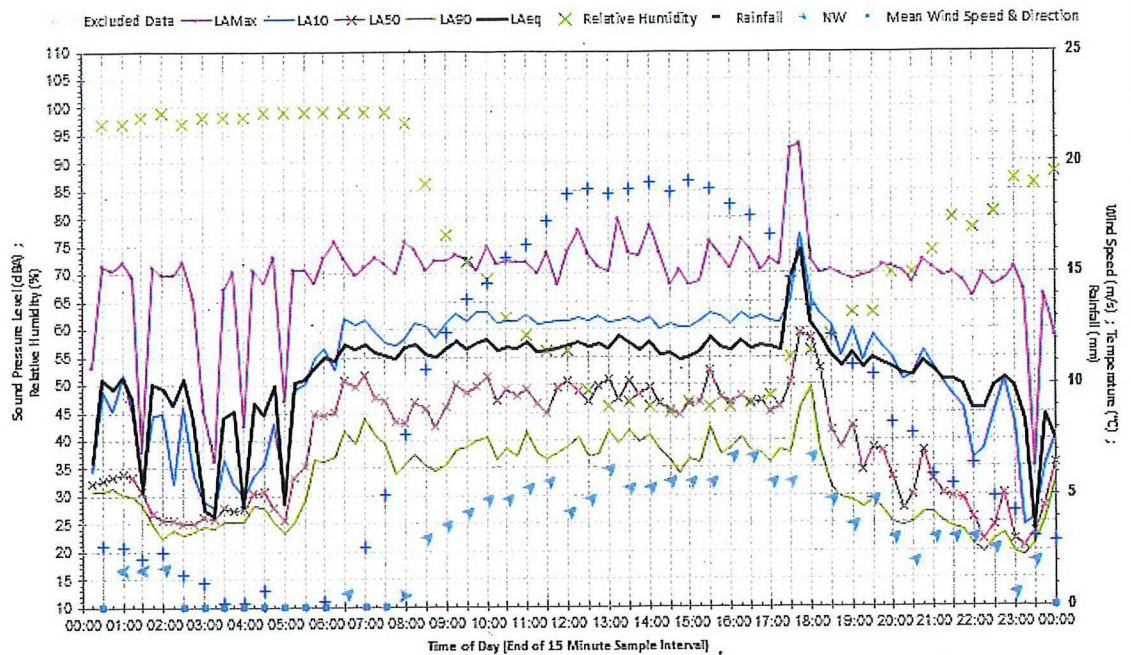
The road traffic noise results include $L_{Aeq}(15hr)$, $L_{Aeq}(9hr)$ and $L_{Aeq}(24hr)$ noise parameters and the results are summarised in the report.

Appendices

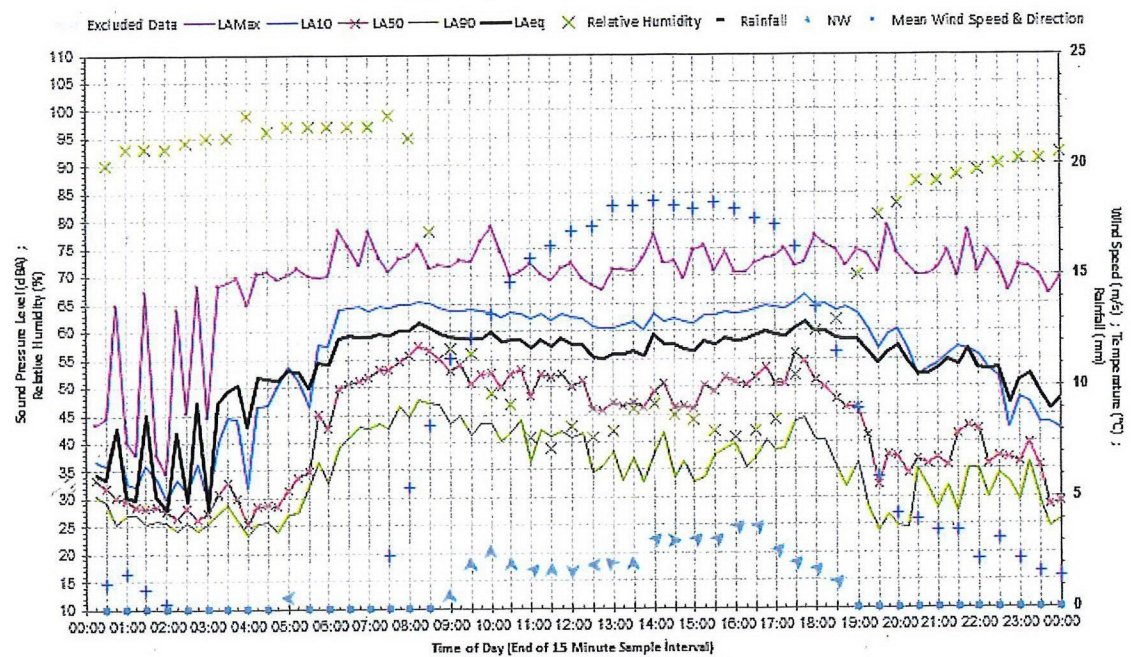
Appendix A – Noise monitoring charts



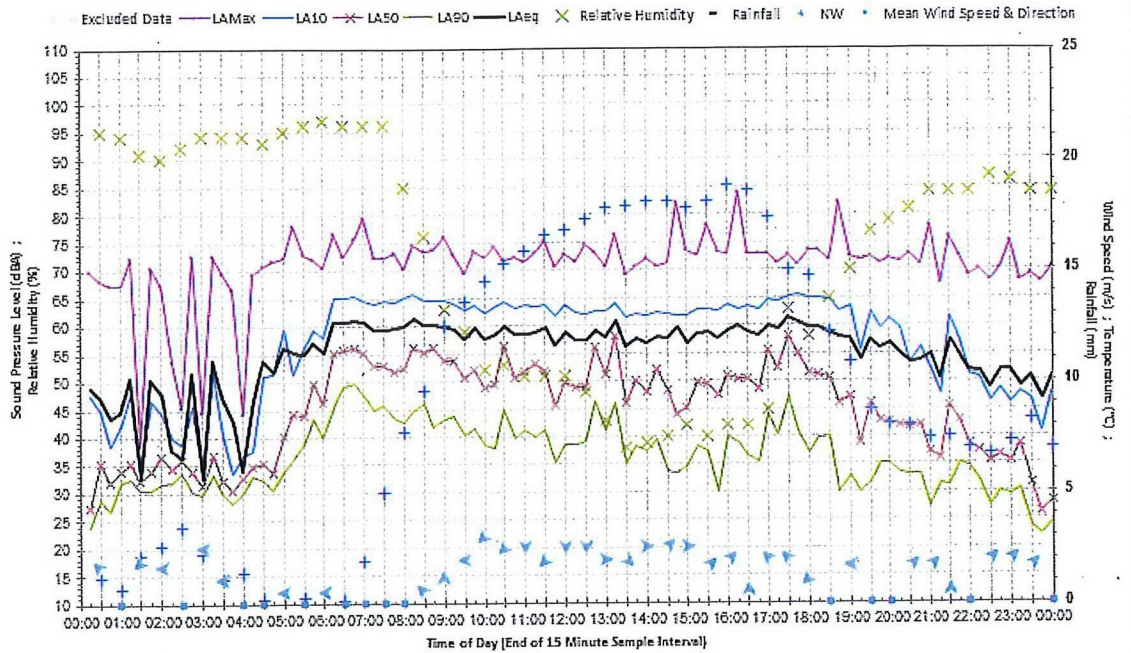
Statistical Ambient Noise Levels Sunday 23 September 2018



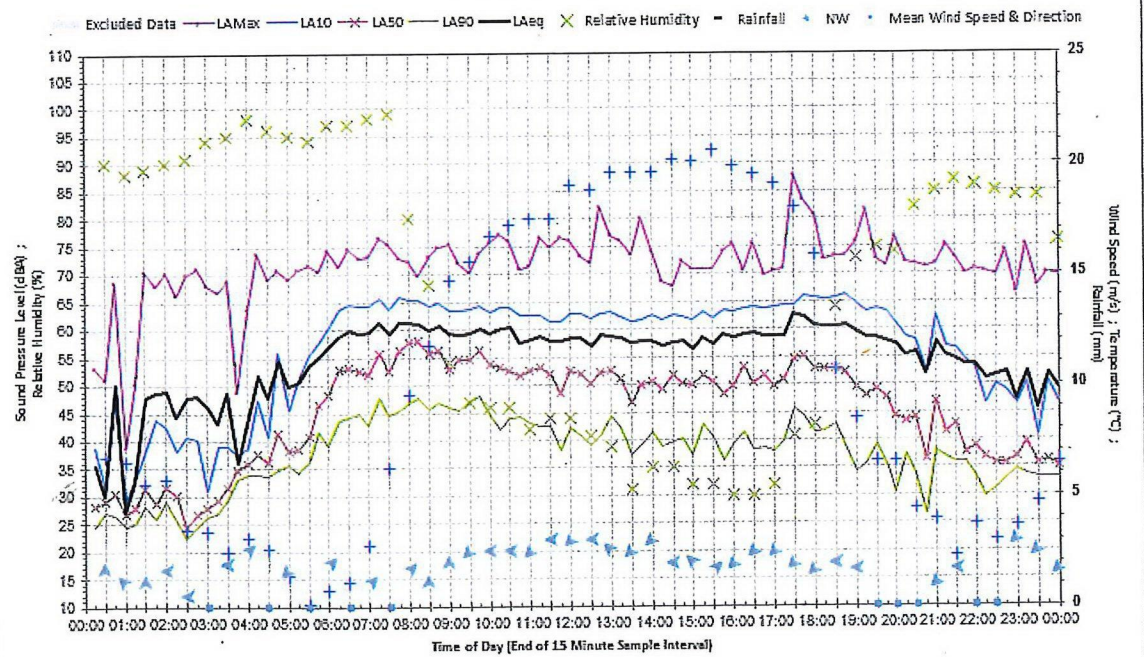
Statistical Ambient Noise Levels Monday 24 September 2018



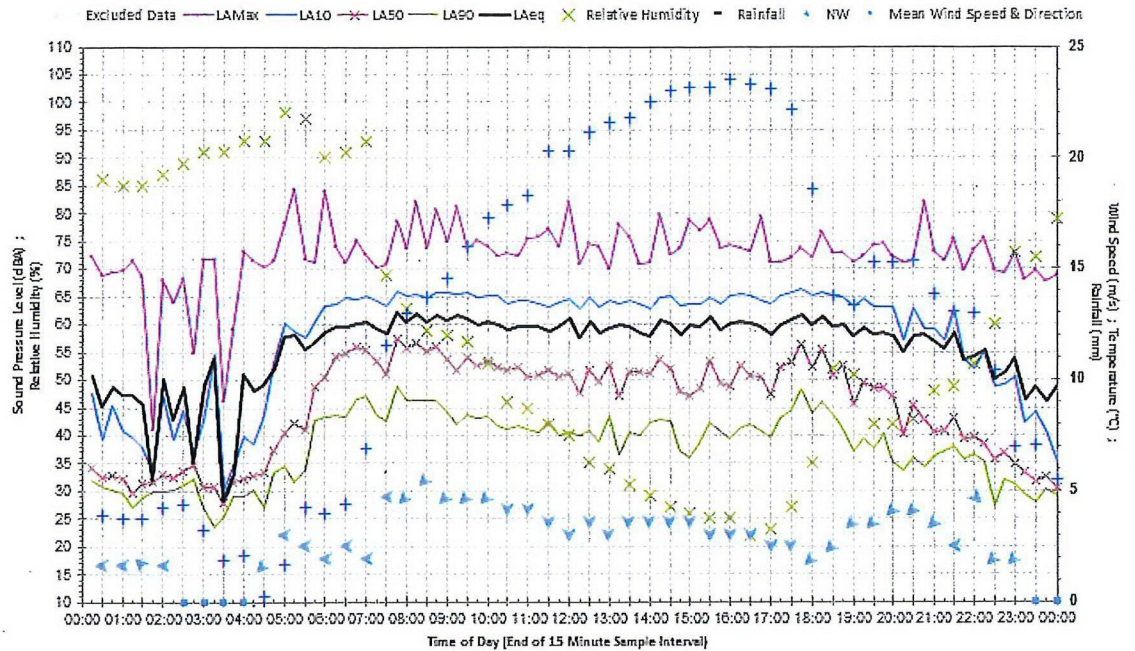
Statistical Ambient Noise Levels Tuesday 25 September 2018



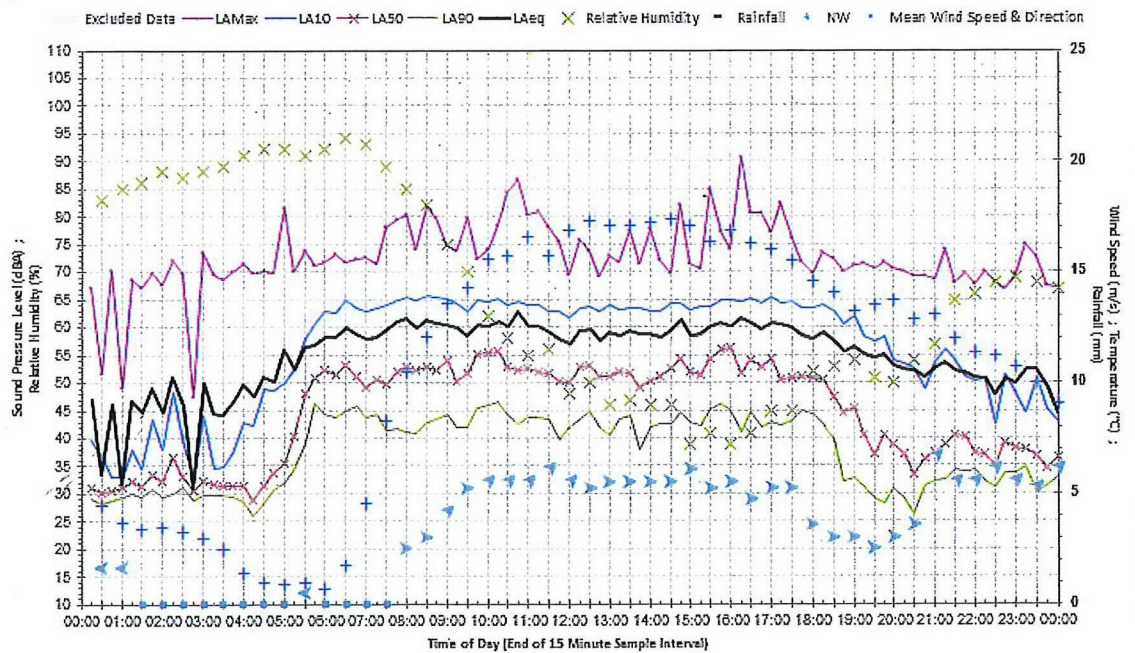
Statistical Ambient Noise Levels Wednesday 26 September 2018



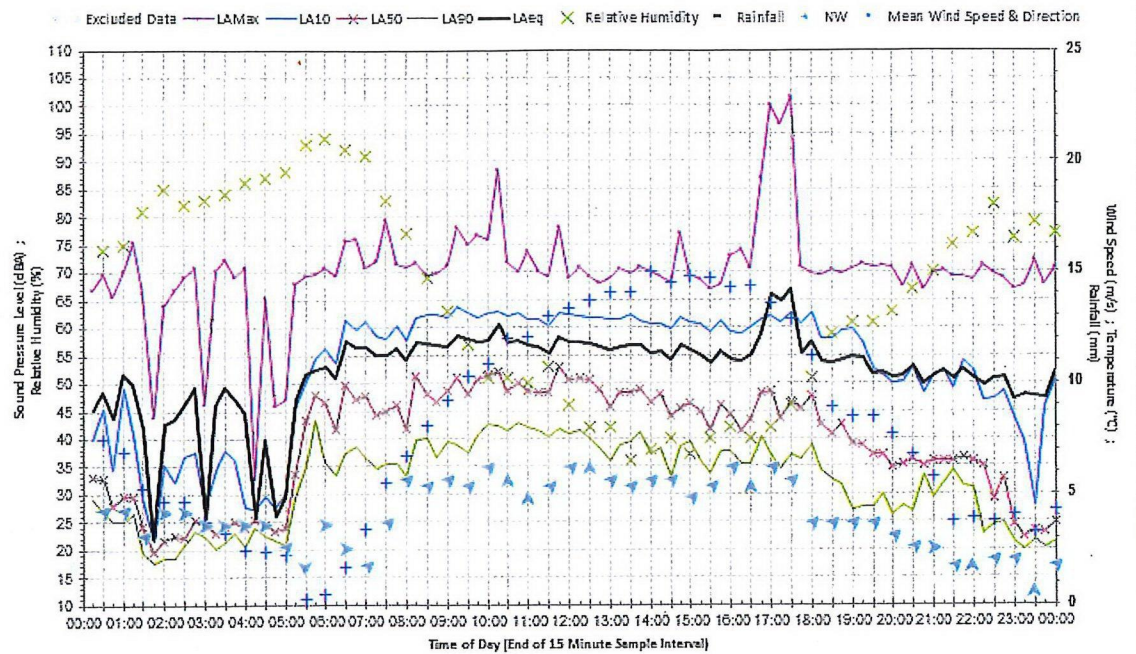
Statistical Ambient Noise Levels Thursday 27 September 2018



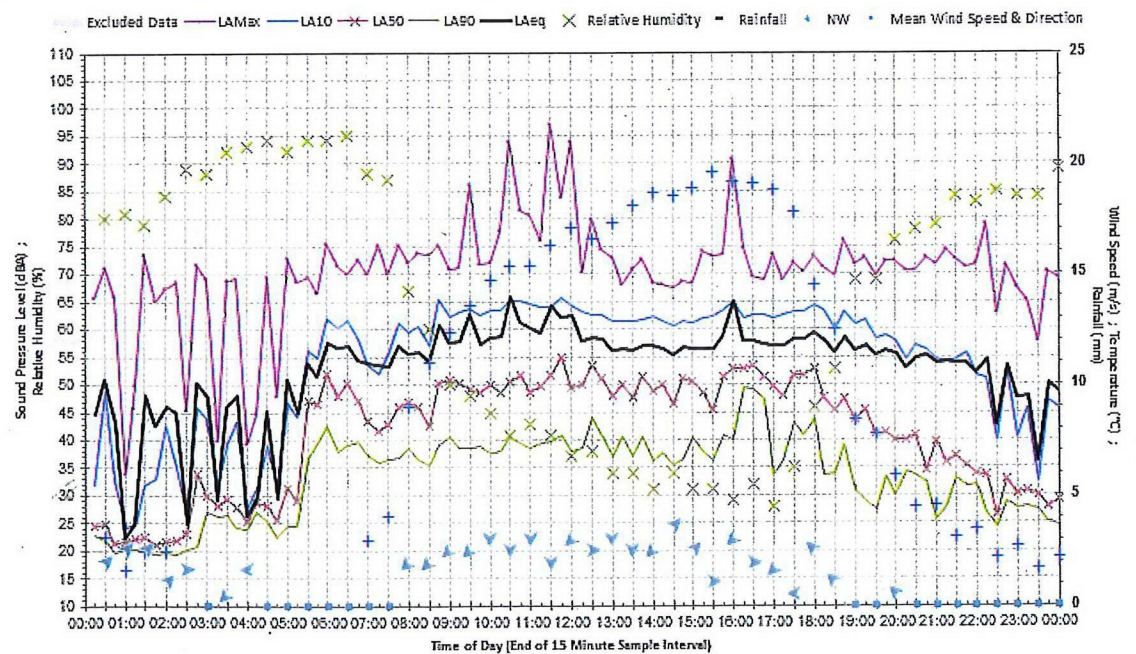
Statistical Ambient Noise Levels Friday 28 September 2018



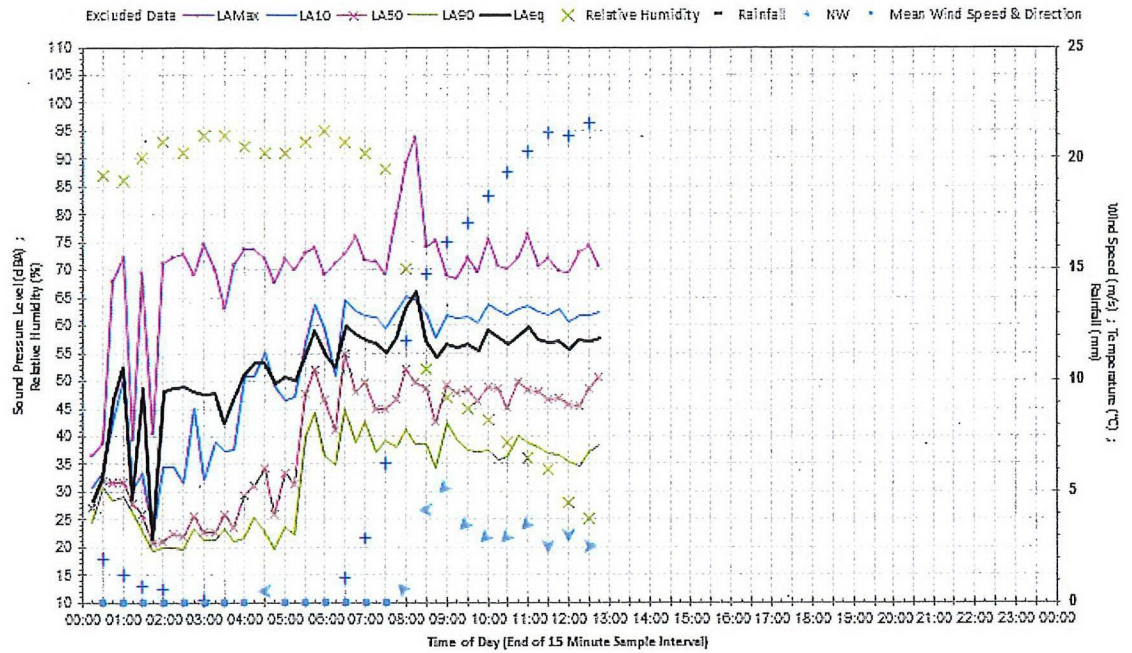
Statistical Ambient Noise Levels Saturday 29 September 2018



Statistical Ambient Noise Levels Sunday 30 September 2018



Statistical Ambient Noise Levels Monday 1 October 2018



Appendix B – Calibration certificate

**CERTIFICATE OF
CALIBRATION**

CERTIFICATE No.: SLM 22431 & FILT 4575

Equipment Description: Sound & Vibration Analyzer

Manufacturer: Svantek

Model No: Svan-979 **Serial No:** 27100

Microphone Type: 40 AE **Serial No:** 137942

Filter Type: 1/3 Octave **Serial No:** 27100

Comments: All tests passed for class 1.
(See over for details)



Owner: GHD Pty Ltd
Level 15, 133 Castlemain Street
Sydney, NSW 2000

Ambient Pressure: 1000 hPa ± 1.5 hPa


Temperature: 24 °C ± 2 °C **Relative Humidity:** 60% ± 5 %

Date of Calibration: 29/03/2018 **Issue Date:** 03/04/2018


Acu-Vib Test Procedure: AVP10 (SLM) & AVP05 (Filters)

CHECKED BY:  **AUTHORISED SIGNATURE:** 

Accredited for compliance with ISO/IEC 17025 – Calibration
The results of the tests, calibration and/or measurements included in this document are traceable to
Australian/national standards



Accredited Lab. No. 9262
Acoustic and Vibration
Measurements



HEAD OFFICE
Unit 14, 22 Hudson Ave. Castle Hill NSW 2154
Tel: (02) 96088133 Fax: (02) 96088233
Mobile: 0413 809800
web site: www.acu-vib.com.au

Page 1 of 2
AVCERT10 Rev. 1.3 05.02.18

Appendix C – Glossary of acoustic terms

Abbreviation	Definition
dB	Decibel is the logarithmic unit used for expressing the sound pressure level (SPL) or power level (SWL) in acoustics.
dB(A)	Frequency weighting filter used to measure 'A-weighted' sound pressure levels, which conforms approximately to the human ear response, as our hearing is less sensitive at very low and very high frequencies.
L _{Amax}	The A-weighted maximum sound level recorded during the measurement period.
L _{Aeq} (15hr)	The A-weighted equivalent continuous (energy average) L _{Aeq} noise level for the period 7 am to 10 pm.
L _{Aeq} (9hr)	The A-weighted equivalent continuous (energy average) L _{Aeq} noise level for the period 10 pm to 7 am.
L _{A90} (period)	The A-weighted sound pressure level exceeded for 90 per cent of the time over which a given sound is measured. This is considered to represent the background noise.

GHD

Level 15

133 Castlereagh Street


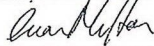
T: 61 2 9239 7100 F: 61 2 9239 7199 E: sydmail@ghd.com

© GHD 2018

This document is and shall remain the property of GHD. The document may only be used for the purpose for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.

GHDDocId/https://projects.ghd.com/oc/Sydney/nabinalongandjugion/Delivery/Documents/2126751-REP 7 Ashford Road Howlong.docx

Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	E Milton	V Lau		E Milton		8/10/18