

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.

Sight 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

Leigh Ashford