

Howlong Sand and Gravel Quarry Expansion – comments by M. Considine

Open for public comment until 27 May 2020 at https://www.planningportal.nsw.gov.au/major-projects/project/9896?fbclid=IwAR12Sg52Gux7anQYOW_h66jCWUoYhedSc1R90gxzkdQm6xfMERjImkGC-tc

I live in the Howlong and Chiltern areas. The following are my comments on the community amenity, safety, and environmental issues for the Howlong Sand and Gravel Quarry Expansion. They are based on my understanding of the development which I have outlined in the Background Notes following my comments.

Comments

- The exhibited documents note ***“Residual impacts of the Project include the generation of dust and operational noise as well as potential changes to water resources and wear on the road network that could impact the attractiveness of the local area to tourists and residents”***.
- In Howlong:
 - The increase in semi-trailers moving through town will impact: safety at the school crossing; safety for pedestrians crossing the street in the shopping area, which is split by Hawkins St (part of the Riverina Highway); amenity of the multi-use recreational areas along Hawkins St and the road itself, which is already in bad repair. Possible consideration: Trucks should not be dispatched during school drop off and pick up times; 40 km/h zone in the shopping centre.
 - Increased noise from the trucks: Trucks will move through Howlong from 6.30-7 am in the morning, until 10-10.15 pm at night. The application notes the expected noise of these large trucks falls within the criteria for NSW freeways, arterial and sub-arterial roads. However, Howlong is not a freeway; it is a quiet rural environment, reliant on its outdoor amenity, including the country golf course and resort, for community recreation and regional tourism. Possible consideration: Can we have assurance that noise from the quarry will not be heard from the town and that all truck movements begin no earlier than 7am and cease no later than 8 pm?
- Murray River and groundwater: One pit will be 100 m from the river channel, which would seem to increase risks to the Murray itself. River, floodplain and groundwater flows will be all be affected by the development. The levees will be built to 1:100 year flood event; however, has this taken into account future climate change scenarios? Possible consideration: Can we have assurance that flood and pollution risks from the development – such as flooding upstream and downstream due to levees, and increased losses from groundwater – will not impact the town, including under future climate change expectations.
- Biodiversity: There will be major changes within the environmental management zone for wetlands and for landscape/riparian connectivity.
 - At this stage, the applicant’s objectives for the environment are general, and it is not clear what can be realistically achieved, in terms of functioning wetlands and floodplain ecosystems. For example, there are issues around the excessive depth of the pits for wetlands; managing the pits for both irrigation and environmental purposes; and the long-term commitment for managing wetlands after the quarry has finished (including the long-term management of the levees). Possible consideration: A more detailed management plan be prepared and approved by an independent evaluator (e.g. university) before proceeding with the development.

- Sloane’s Froglet has been uplisted from Vulnerable to Endangered under the Commonwealth Environment Protection and Biodiversity Conservation Act (EPBC Act) on 4 July 2019. Correspondence from the relevant Commonwealth department included in the exhibited project documents suggests the development does not require referral, but it is dated 4 June 2018. Therefore, the development needs to be assessed for impacts on the Sloane’s froglet as Endangered rather than its past status of Vulnerable under the Commonwealth Act.

The EPBC Conservation Advice for Sloane’s Froglet highlights that the species has largely contracted its range to wetlands along the Murray from Albury to Corowa. The action, with its hydrological alterations, will change existing local wetlands around the quarry. It should be assessed for likely significant impact on Sloane’s Froglet round issues such as: the long-term decrease in the population; loss of occupied areas (the species presence on the site is still indeterminate); fragmentation and decreasing connectivity; and modifying, removing and decreasing the availability or quality of habitat. It should also be assessed as to whether it is consistent with the EPBC Conservation Plan. Possible consideration: Consult with the scientific expert on Sloane’s Froglet at Charles Sturt University for advice on likely impacts, or submit the action for significant impact assessment under the EPBC Act.

- The Superb Parrot, a threatened species under both NSW and Commonwealth legislation, is a feature of Howlong, with many using the area during the breeding season and at other times during the year. It is not clear where the breeding sites are located along the river. Last year during October, over 20 birds fed daily in the grass on the side of Hawkins St for over 2 weeks. One bird was killed on the road by a vehicle (see photos). Trucks are often hitting native birds in the area. Possible consideration: In the proposed Drivers Code, drivers be made aware of the presence of threatened native species in the area, and drive with care when approaching them. This would also be important for trucks on the Chiltern-Howlong Road moving towards the Hume Highway as it cuts through the Chiltern National Park.



- For communication: over the course of the development, the developer should make relevant documents and annual reports of community interest publicly available, for public comment. Public notification should include using the popular local news outlet, the *Howlong Grapevine*.

Background Notes

Site and zoning:

- Adjacent to the Murray River, off Riverina Hwy, 2.5 km south-east of Howlong.
- In a flood zone within the Murray River floodplain, and includes Black Swan Anabran and Cods Creek.
- Most of the area is zoned E3 "Environmental Management" under Corowa planning which includes ensuring development is compatible with the flood hazard and riparian corridor of the Murray River. The area includes a number of ephemeral wetlands. Extraction is allowed with consent. Also partly zoned for agriculture (RU1).

Proposed action:

- Annual removal of 300 000 tonnes/annum for 30 years (from existing 30 000 tonnes) or about 9million tonnes
- It will result in four pits 21 m deep with a combined surface area of 42 ha (eventually all filling with ground water). It includes the construction and maintenance of 2.7 m high levee banks up to the 1:100 year flood level around each pit.
- Equipment to be used: suction dredge; floating cutter; hydraulic excavator and crushing unit.
- It will supply construction industries (eg concrete) including to Albury, Corowa and Wangaratta, with an increasing market in Melbourne (via concrete operations in Benalla). It includes moving trucks through Chiltern, on the Victorian side of the border.
- Approximately 100 ML of groundwater will be used each year. Groundwater will flow into the pits, and accumulated water will be moved between the 4 pits during the 30 years. After this, pits will be made into settlement ponds for wetlands. Water will also be used for farm irrigation during and after 30 years.
- Rehabilitation of various parts of the site is to occur over and after the life of the quarry.
- Currently 8 people are employed, but the proposed expansion will only increase this by 2 F/T employees, ie total of 10. Trucking will be done by independent companies.

Potential impacts and risks:

- Disturbance area: 56.5 ha; clearing < 1ha.
- Trucks: 19m/26m trucks and Dog or B-Double vehicles will travel to and from the quarry, in a western direction only, through Howlong. There will be 80 truck movements/day (40 laden); currently there are 8/day.
 - Up to 12 movements/hour (1 every 5 minutes).
 - Increased traffic where Quarry Road intersects Riverina Hwy (100 km/hr speed zone), the main route between Albury and Howlong, with no road changes e.g. no turning lanes.
- Times: Extraction occurs: 7 am-5 pm (Mon-Fri);
Despatch: 7am-10 pm (Mon-Fri), 7-12 Sat
Audible maintenance: 7 am-5 pm (Mon-Sat)
- Murray River and floodplain: one pit will be 100 m from the Murray River channel. Flow regimes around the floodplain will be altered. Wetlands will be removed within impact sites.
- Groundwater: medium risk of groundwater contamination and reduced flow to Murray River. The pits will become evaporative and irrigation water supply sinks on the floodplain, with localised groundwater flow paths reflecting this. Evaporation will lead to increased water loss from the pits and impact discharge from the Upper Murray Aquifer system.