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Narrabri NSW 2390

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Thursday, 22 September 2022

**Re: Inland Rail – Narromine to Narrabri Project – Combined Preferred Infrastructure and Amendment Report Submission**

Dear Mr Fallon,

Thank you for the opportunity to make a submission on the Inland Rail (IR) Narromine to Narrabri (N2N) combined Preferred Infrastructure and Amendment Report and accompanying document (PIAR). I am writing to express my concern about and opposition to the current proposed IR route around Narrabri, and much of the content of the PIAR.

I am a resident of Narrabri and have been so for 35 years. My husband and I have a young family, work locally and have chosen to make Narrabri our forever home. There are many aspects of the project which I am concerned about, the most significant of which are outlined below.

- (1) The close proximity to the Narrabri township and residential areas: the proposed route runs through and very close to residential areas which has implications not only for noise, which has not been properly assessed, but also visually will be in eyesore. The speed, frequency and height of the trains is also of significant concern.
- (2) Disruption to traffic flows and residential streets: if the traffic estimations are correct or even close to, there will be significant disruption to Gibbons Street during the construction phase. The effect on Narrabri local streets during construction of the proposed route will be significant. If construction takes place for 16 hours a day then this is a heavy vehicle movement about every 2 minutes and 50 seconds on average. If the construction time per day is 12 hours then there will be a heavy vehicle movement about every 2 minutes 10 seconds on average. It is clearly evident that the negative impacts will be very significant in this area and other areas of Narrabri during construction.
- (3) The turning traffic into Gibbons Street would also disrupt the traffic flow along the Newell Highway. Of particular concern to me is the disruption and safety risk to the services along Gibbons Street, including the Narrabri Hospital, aged care facilities and Nurruby Childcare Services. My children attend Nurruby and given the lack of off-street parking, any increase in traffic, particularly heavy vehicle traffic, poses a huge safety risk. There is also a lack of turning lane for traffic going into the hospital which increases the collision risk with heavy vehicles.
- (4) Disruption to existing services: one of the features of Nurruby is the ability for the children to spend time outside both for learning and play. With a heavy vehicle movement every 2-3 minutes every day, this time will be severely affected and disrupted. Noise and air pollution from the increased traffic will also result and the impacts of this have not been measured or estimated.

While these are my concerns in regards to the Narrabri town, there are many other construction-related benefits to moving the rail line to the alternate route proposed by the Narrabri inland Rail Concerned Residents Group (NIRCRG), including a decline in the number of landholders affected. Given the trains won't be stopping at Narrabri, there is simply no need for the close proximity to town. It is therefore requested that IR investigate the alignment proposed by the NIRCRG) as soon as possible.

The current proposed location immediately downstream of the Narrabri Township, crosses the Namoi River Floodplain in the widest location available. It seems counter-intuitive to cross Bohena Creek with a bridge near the Newell, then the Namoi River, the Island Road floodplain, Narrabri Creek and the floodplain between Wee Waa Road and Auscott Sheds, with an enormous bridge immediately downstream of the town, rather than going downstream and crossing these with one structure less than half the length of the existing small bridge across the Namoi and Narrabri Creek.

The following points illustrate just some of the many benefits of the proposed alternate alignment:

- I. There is no bridge over Bohena Creek near the Newell Highway;
- II. There is no need to squeeze past Bohena Creek again 5.7 kms past the proposed Bohena Creek Bridge;
- III. There is no need to cross Spring Creek near this same location;
- IV. The crossing of the Namoi River is now downstream of where the Namoi River, Narrabri Creek and Bohena Creek join and the bridge length required can be shortened compared to the bridge length required at the current location on the edge of town;
- V. The alternate route's required bridge length, to satisfy flooding requirements, is around 2,730 metres. If IR were to continue the bridge on the northern side across the Kamilaroi Highway that adds around 600 metres making the total length of the alternate route's bridge 3,300 metres with about 17 culverts. Alternatively IR could just build a bridge of length of say 60 metres across Kamilaroi Highway making the total length of our two bridges 2,790 metres. By contrast, the proposed route now has total bridge lengths of about 6375 metres with about 25 culverts plus an embankment 9 metres high and 450 metres long between the Narrabri to Walgett rail line and Yarrie Lake Road;
- VI. In the proposed alternate alignment the IR track would drop to ground level at Culgoora Road to allow connection with the Narrabri to Walgett rail line at ground level. A boom gate rail crossing would be required on Culgoora Road for the IR line. By contrast, the intersection at the Narrabri to Walgett line on the proposed route is about 9 metres difference in height meaning that the junction of the lines at ground level has to be about 900 metres back towards Coonabarabran (1 in 100 grade of the IR line);
- VII. Access requirements to the Narrabri Shire Sewage Treatment Works across the line is no longer required and the Stock Route access is simplified;
- VIII. There is no longer any need to drag the large trains up over Knights' Hill opposite the Wheat Research Station;
- IX. Potential cost savings in construction cost and costs to Narrabri Residents;
- X. Potential shortening of track distance;
- XI. Nil disruption from noise on the edge of Narrabri;
- XII. There are no flooding and/or noise issues or land valuation reductions on the north-western edge of Narrabri Town;
- XIII. The NIRCRG recently received a final report from their consulting engineers, WRM water+environment, on the bridge requirements for the proposed IR Alternative Route which concludes that, from a cost and flood impact perspective, the proposed alternate route is far superior than the proposed route;
- XIV. Of considerable note is that on the proposed alternate alignment no dwellings are impacted even by the 1:200 (0.5%) year flood. By contrast it appears from information provided by IR that their route will impact 13 properties in the Wee Waa Road area in a 1 in 100 year flood by an amount greater than that accepted by the NSW Planning Department. IR, therefore, has to

- acquire these properties, or compensate the owners or redesign their bridge/culverts in this area;
- XV. IR do not provide the data for a 1 in 200 year flood which will be considerably greater than the 1 in 100 year flood; and
- XVI. Most importantly; the proposed alternate route removes any flood impacts on the township of Narrabri.

Shifting the route delivers a win-win outcome for the Narrabri Community and the IR project. The NIRCRCG has one objective; we simply want to get the best outcome for the Narrabri community. To do that the route must be shifted. IR's assertion that the Proposed Route is superior to the Alternative Route **cannot be justified by facts**. IR claims that the alternative route follows Route 502 which they have assessed. **This is incorrect. The Narrabri Alternative Route has not been assessed by IR to date.** I believe that an independent assessment (not done by IR) of the Narrabri Alternative Route against the IR Proposed Route is required ASAP.

#### Why is the Alternative Route better than the Proposed Route?

There are many reasons. The following comparisons give some idea of why:

Issue	Narrabri	Inland Rail
	Alternative	Proposed
Approximate number of dwellings/commercial buildings within 500 metres of the proposed alignment	12	33
Approximate number of dwellings/commercial buildings within 1000 metres of the proposed alignment	18	108
Approximate number of additional dwellings/commercial buildings affected by additional flooding greater than 10mm in depth	0	13
Will the line increase flood levels and velocities in Narrabri	No	Yes
Approximate length of bridge over the Namoi floodway	3.3 km	4.9 km
Approximate total length of bridges	3.3 km	5.8 km
Approximate number of bends	6	20
What hills have to be negotiated by the trains	None	Knight's Hill
Will the intersection with the Narrabri to Walgett Rail line be at ground level?	Yes	No, 8m up
Will the construction of the line affect Narrabri Streets	No	Yes
Will there be negative impacts on Narrabri for 100 years	No	Yes
Approximate total length of line	40.2 km	39.3 km
Will the line impact on Newell Highway south of Narrabri	No	Yes
During construction	No	Possibly
When finished	No	Possibly

The township of Narrabri is highly susceptible to flooding, both riverine and localised. Infact, it is considered that there is no other town in inland NSW that is more susceptible to flooding than Narrabri. The existing rail infrastructure in and around Narrabri plays a key role in both the distribution of flow and flood levels, for both local flooding from Mulgate Creek and local waterway catchments, as well as during regional Namoi River flood events. With that in mind, it is likely that new/upgraded rail infrastructure associated with the N2N project will play a key role for flooding in/around Narrabri.

IR have maintained that their target for all projects is to limit the afflux on existing buildings to 10mm (1cm). The results show some buildings having an afflux of between 1cm and 5cm. Why was this fact not included in the EIS in the first instance, and those in the local community potentially affected, as well as the general public, made aware of the potential afflux associated with the more frequent localised flooding?

IR have adopted the following afflux (flood level impact) performance criteria when designing the rail for events up to and including the 1% AEP event:

- i. Afflux less than 10 mm for:
  - properties flooded above the habitable floor level;
  - sensitive infrastructure; and
  - highways and sealed rural roads.
- ii. Afflux less than 200 mm for urban and recreational areas.

The IR rail design does not comply with their own design objectives with afflux exceeding the criteria at multiple properties. They have also not provided any justification for not meeting their own non-compliance.

The proposed rail embankment crosses the Lower Namoi Valley floodplain, which is a declared floodplain under the Water Management (General) Regulation 2018. Under this plan, any flood works on the floodplain are regulated by the Floodplain Management Plan for the Lower Namoi Valley Order 2020 issued under the Water Management Act 2000 (FMP). A 'flood work' within the FMP means a work that is:

- i. situated in or in the vicinity of a river, estuary or lake, or within a floodplain, and is
- ii. of such a size or configuration that (regardless of the purpose for which it is constructed or used), it is likely to have an effect on the flow of water to or from a river, estuary or lake, or the distribution or flow of floodwater in times of flood.

IR have stated that the rail is NOT a 'flood work' as defined by the FMP. However, the N2N rail embankment on the Namoi River floodplain would appear to fit within this definition and therefore would be a flood work. Although the project is a State Significant project and is not subject to the conditions of the FMP, it would be expected that the Minister would need to consider these criteria for this type of flood work. Under the FMP, the proposed IR works within the AD zone would generally not be permitted. The works in the B, C and CU management zones stipulate that the Minister would need to consider (amongst other criteria) whether the flood works would likely:

- i. increase flood levels by greater than 20 cm on adjacent landholdings and other landholdings; and
- ii. increase flood levels resulting in impacts on high value infrastructure (buildings).

The N2N current proposed route still does not comply with either of these criteria in Narrabri from the Namoi River or Bohena Creek.

Another big failing of the PIAR, is that nothing new has been proposed/included and thus the disconnect between IR and the Narrabri community remains. To date, the contact by IR with proposed affected

landholders has been dismal and sporadic at best. Lack of consultation with the community has been a common practice of IR, and a significant amount of assumptions have been made by IR on many local issues.

The effect of the proposed route on the Narrabri community will be negative and long lasting. There are many other features of Narrabri which are worthy of recognition and have a positive association, however a high-speed rail line isn't one of them. The following groups are supportive of the proposed alternate route at Narrabri;

- Roy Butler, State Member for Barwon
- Narrabri Councils (January 2021 and April 2022),
- Narrabri Chamber of Commerce (March 2022),
- The local Nationals (February and March 2022).

In an effort to address the aforementioned wide ranging and broad community issues, it is requested that IR review the proposed alternate route as soon as possible to address these very real community concerns. The proposed alternate route at Narrabri is flatter, straighter, faster and cheaper to construct. It is a better route.

If you require any further clarification, please do not hesitate to contact me on [REDACTED] [REDACTED]  
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Yours faithfully,

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