

21 July 2026

Ref: KB:KB

The Secretary
Department of Planning Housing & Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sir/Madam

Re: Inland Rail Illabo to Stockinbingal (I2S) Administrative Modification 01 (CSSI 9406) – Proposed Amendment to Condition E88

Parkes Shire Council supports the concerns raised by Junee Shire Council regarding the proposed amendment to Condition E88 of the Inland Rail Illabo to Stockinbingal (I2S) Project. The proposed modification would replace the requirement for formal endorsement of level crossing designs by the relevant road authority with a requirement for consultation only.

Council considers that road authorities should retain an appropriate decision-making role where infrastructure directly affects roads for which they have ownership, management, maintenance and statutory responsibility. We are concerned that the proposed change creates a disconnect between accountability for road assets and authority over key design decisions.

Local councils possess detailed knowledge of local road conditions, traffic movements, heavy vehicle and agricultural vehicle usage, crash history, community concerns, and the day-to-day operation of the road network. This local understanding is developed through the ongoing management of road assets and direct engagement with the communities that use them. As the authority responsible for these roads, councils are uniquely placed to understand local circumstances and identify potential risks and operational issues that may not be evident to other agencies.

Maintaining a requirement for formal road authority endorsement helps ensure that this local knowledge is properly considered and that the best possible safety and operational outcomes are achieved for road users. While consultation is important, it should not replace a meaningful decision-making role for the authority that owns, manages and maintains the road network. Council believes that road authorities should continue to be listened to and afforded appropriate weight in determining infrastructure outcomes that will have long-term impacts on local communities and road users.

Council also supports the application of Safe System principles to the design of new transport infrastructure and considers that governance arrangements for major projects should promote collaboration while preserving clear accountability for road safety outcomes. The retention of formal road authority endorsement provides an important safeguard in achieving these objectives.



Accordingly, Parkes Shire Council supports Junee Shire Council's request that the Department reject the proposed amendment to Condition E88 and retain the requirement for formal road authority endorsement of level crossing designs. Specifically, Council respectfully requests that NSW Planning:

- I. Reject the proposed amendment to Condition E88.
- II. Retain the requirement for formal road authority endorsement for level crossing design
- III. Ensure that infrastructure approvals continue to reflect best practice safety, governance, and integration principles
- IV. Reinforce the role of local government as a key stakeholder and decisionmaker in road safety outcomes

Thank you for considering this submission.

Yours sincerely,

**Kent Boyd,
General Manager**