

Mr M Fallon

Team Leader, Transport Assessment

NSW Department of Planning, Industry and Environment

Locked Bag 5022

PARRAMATTA NSW 2124

Dear Sir,

**Re: Submission on Preferred Infrastructure Report, Inland Rail Project – Narromine to Narrabri**

This submission on the Preferred Infrastructure Report (PIR) for the Inland Rail Narromine to Narrabri (N2N) project is on behalf of the Narrabri Inland Rail Concerned Residents Group (The Group). The Group is in favour of the project however we have serious reservations about the route adjoining Narrabri. This submission only relates to the last (northern) 40 kilometres (approximate) of the Narromine to Narrabri section.

**Background**

In November 2017 Inland Rail (IR) produced its Proposed Route (herein referred to “Proposed”) for the rail line. A Narrabri local businessman was alarmed at the location of the route and proposed the Alternative Route (Alternative). This Alternative was made public in the local paper on 22<sup>nd</sup> March 2018. A plan of the two routes is attached as Appendix A.

Since then, many Narrabri people have joined together as the Narrabri Inland Rail Concerned Residents Group. The Group has no political affiliations and is simply a very large (and growing exponentially) and diverse group of locals who are dismayed at the route chosen by Inland Rail adjacent to Narrabri.

**Why Must The Alternative Route Be Assessed?**

A letter dated 30 April 2021 from Glen Snow, Director, Transport Assessments, Dept Planning, Industry and Environment (now Department Planning and Environment, referred herein as “DPE”) to Inland Rail, set out various requirements for the Preferred Infrastructure Report. The third paragraph of that letter clearly instructs IR to assess “alternative rail alignments”, “particularly in proximity to the towns of Narromine and Narrabri”. The letter is attached as Appendix B. IR, despite claims to the contrary, have not done this with regard to Narrabri. They claim to have done so however this is clearly and demonstrably untrue.

IR have not complied with the requirements outlined in the letter from DPE and as such their PIR is totally deficient.

IR must be made to have an **Independent Assessment** undertaken where the Alternative Route is compared to the Proposed Route.

## Comparison of the Alternative Route and the Proposed Route

The Group has engaged WRM Water and Environment Pty Ltd to undertake a Flood Impact Assessment of the Alternative. This assessment is attached as Appendix C.

The result of the assessment could hardly be more emphatic in showing the superiority of the Alternative over the Proposed.

### Flood modelling results

The flood modelling results produced by IR show that the design of the infrastructure does not comply with the requirements of the Department of Planning and Environment in relation to Quantitative Design Limits for flood afflux. There are 13 buildings which do not comply in a 1 in 100 years flood event.

Furthermore, given the flood events that have impacted parts of the eastern areas of Australia in the past few years, it seems only reasonable that IR be required to model the 1 in 200 years flood event and the additional impact of IR infrastructure. Although this is not a DPE requirement it seems negligent that a Federal government project does not have such modelling done.

The WRM assessment shows that on the Alternative, **no dwellings are impacted negatively in a 1 in 200 year flood event.**

### Structures Required

Appendix D gives a comparison of the structures required for the two routes. These figures have been determined from the WRM flood impact assessment and from information provided by IR.

The Proposed has three bridges totalling about 6,375 metres in length and 24 culverts.

By comparison, the Alternative has a bridge length between 2,700 metres and 3,300 metres depending on the final layout in relation to the Kamilaroi Highway area. The Alternative has 17 culverts.

The Alternative requires, therefore, between 3,075 metres and 3,675 metres less bridge length.

### Cost Comparison of two routes

The Group has had an independent assessment done of the cost of the two routes. The assessment shows a **saving in construction costs of \$212.9 million dollars if the Alternative is used.** This saving does not take into account the difference in costs for the intersection of the IR line with the Narrabri to Walgett line.

The Alternative intersects at the same height, ie. Ground level. The Proposed intersects at a height difference of about 9 metres. There should be significant additional construction cost saving on the intersection if the Alternative is adopted.

## Other Factors Compared Between the Two Routes

Appendix E shows a comparison of a number of factors relating to the two routes. It is clear that the Alternative is a far superior route when such factors are considered.

## Proposed Route Disadvantages

The proposed route has several major problems, some of which are:

- A new bridge is required over Bohena Creek.
- At a point about 5.7km north of Bohena Creek the edge of Bohena Creek is only about 50 metres from the Newell Highway formation. Squeezing the new line into this gap will cause problems and major disruption to highway traffic during construction.
- A new bridge is required over Spring Creek.
- The route crosses the Namoi River floodplain is at one of its widest locations.
- The floodplain bridge/viaduct will increase flood levels.
- Access to the Narrabri Sewage Treatment Works will be compromised.
- There is interaction with seven major powerlines in a confined area west of the treatment works.
- The increased transport during construction will have a major impact on Narrabri Streets and local traffic.
- The route through Narrabri will cause major problems for landholders. Many of the properties affected are smaller holdings. Those that have their properties resumed will be the lucky ones. Those that are left adjacent to the route will have varying problems including noise, flooding, access, visual effects which will have severe social impacts on their lifestyle.
- It is proposed that once constructed there will be 10 trains per day in 2025 rising to 14 trains per day in 2040. For 2025 that is a train every 2 hours 24 minutes. These trains are to be 1.8 kilometres long and travelling up to 115 kilometres per hour. The trains are about 6.5 metres high. This height is substantial and this does not even account for the height of the rails. In the section where the bridge/viaduct exists the viaduct is about 6 metres high. In that section the top of the train will be about 12.5 metres above the ground level. Such frequency, size and speed in either case will have a very significant negative impact on the social life of people in Narrabri and its immediate surrounds. **This is unacceptable.**
- The bridge/viaduct will have a major negative visual impact for the people of Narrabri. The bridge/viaduct will have about 160 pylons. There will be a long-term negative impact on Narrabri people and appears to have been ignored.
- Once the trains leave Narrabri they will have to negotiate the 5.8 kilometres long route over Knights Hill with 5 bends included. A far more sensible flat route with less bends is available.
- **The extent of clearing** on the proposed route is substantial. Where the route follows Newell Highway south of Narrabri a corridor of trees, both hollow bearing and otherwise, will be removed. While it is accepted that such clearing is necessary through Pilliga Scrub, if an alternative route was chosen such clearing near Narrabri would be unnecessary.

## Alternative Route Advantages

An alternative route is available which will remove virtually all the problems associated with the proposed route. Some of the advantages of this route are:

- No bridge is required over Bohena Creek.
- No disruption of Newell Highway traffic will be required south of Narrabri.
- No bridge is required over Spring Creek.
- The bridge/viaduct will only need to be substantially shorter than the Proposed.
- There will be virtually no increase in flood levels.
- There will be no problems with access to the treatment works.
- There will be no powerline interaction within a confined area.
- The construction traffic will be taken away from Narrabri town streets onto rural roads. The construction should be able to be organized to use a haul road adjacent to the train line.
- **NO DWELLINGS ARE AFFECTED.** The number of property accesses affected is minimal.
- The impacts from noise, flooding, visual effects on the alternative route are relatively minor.
- The route is relatively straight and flat with no need to negotiate Knights Hill.
- The clearing of vegetation is significantly less than the proposed route.
- The land affected is generally grazing, not larger residential lots, dryland or irrigated land.

## Public Support

Support for a comparison of the Alternative Route against the Proposed Route has come from many members of the Narrabri community and organizations including:

The Honourable Roy Butler, Member for Barwon

Narrabri Shire Council (three times)

Narrabri Shire Floodplain Risk Management Committee

Narrabri Chamber of Commerce

Narrabri Branch of the National Party (twice)

## Conclusion

For local people that have a knowledge of the area around Narrabri and people who have the professional skills to assess the Alternative Route against the Proposed Route, there is no doubt that the alternative route is much better.

The Alternative should provide cost savings for the project.

The Alternative should see significantly fewer negative impacts from the project.

The Alternative will provide a straighter, flatter, faster route for the life of the project.

**It is unacceptable that when such a viable alternative is available, that IR would choose to severely disrupt the lives of Narrabri people during construction and long-term. The proponents should be required to have an independent thorough comparison of The Alternative against the Proposed.**

Yours faithfully

Ross Gleeson, Retired Registered Surveyor,

Coordinator of Narrabri Inland Rail Concerned Residents Group

and

Jim Purcell, Practising Chartered Professional Engineer,

Spokesperson for Narrabri Inland Rail Concerned Residents Group

22<sup>nd</sup> September 2022