



18 February 2021

SF2018/253369; WST18/00116/08

The Manager  
Transport Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Attention: Mr Mick Fallon**

Dear Mr Fallon

**SSI9487; Narromine to Narrabri (N2N) Inland Rail Project; Review of EIS**

Thank you for your referral to Transport for NSW (TfNSW) on 7 December 2020 received via the NSW Major Projects Planning Portal seeking comments in relation to SSI9487. Reference is made to TfNSW's previous submissions in relation to this proposal dated 7 August 2018 and 28 September 2020.

TfNSW has reviewed the submitted documentation and notes the proposal still includes six at grade crossings of classified roads. TfNSW, in its previous submissions, has clearly stated that all new Inland Rail interfaces with classified roads are to be grade separated. As such, TfNSW objects to the proposal, as submitted in relation to treatment of the road rail interfaces (level crossings).

TfNSW is willing to reconsider its position, subject to amended information being provided for review that provides for grade separated interfaces of classified roads and Inland Rail.

Further to the above, TfNSW has identified a number of matters in the EIS that requires additional information. For a list of these matters, please refer to *Appendix A and B*. TfNSW provides its preliminary assessment of the level crossings proposed under SSI9487 (see Appendix C).

Please confirm with TfNSW that the application will not be determined until such a time as TfNSW has had an opportunity to comprehensively assess the application following provision of information addressing the above-mentioned and attached matters. Should you require further information in relation to this matter, please contact Andrew McIntyre, Acting Manager Development Services on 02 6861 1453.

Yours faithfully

Damien Pfeiffer  
A/Director Development Services  
Regional and Outer Metropolitan

**Transport for NSW**



## APPENDIX A

Page	Section	Issue	Additional Information Request
B11-7	B11.2.1	The EIS refers to “minimal delays” and “long period” waiting times at level crossings. This is subjective, particularly given the majority of the level crossings in N2N currently do not exist (ie there is currently no delays or wait periods at these locations).	Actual projected delay times be provided for each level crossing.
B11-11	B11.2.3	Travelling Stock Route severance	Please confirm where Inland Rail crosses TSRs that stock movement has been accommodated and won't involve movement of stock onto public roads.
B11-13	B11.3.1	There are not any mitigation or management methods provided for accommodating the most vulnerable road users, pedestrians and cyclists.	Details of measures to be employed to provide safe access for pedestrians and cyclists to cross Inland Rail.
B11-15	B11.4.1	Of the 51 proposed new level crossings, 12 are active controls with signals and booms. The calculations for maximum queue length for worst case scenario is inadequate. For example, for Castlereagh Highway the submitted documentation has 96 seconds = 46 metres. However, during harvest periods it is not uncommon for convoys of B-doubles and road trains (B-double 3x26m with 5 m spacing = 90 metres, or road trains 3x 36.5m with 5m spacing = 119m)	Revised delay and queue length analysis including actual heavy vehicle lengths operating on each road.
B11-15 & A7-17	B11.4.1 & A7.4	Use of ALCAM as the only tool to assess risks at road/rail interfaces is not appropriate (see <a href="https://www.alcam.com.au/about-alcam.aspx">https://www.alcam.com.au/about-alcam.aspx</a> )	Revised assessments using ALCAM as well as other guides and tools including: <i>Austrroads Guides</i> , <i>Australian Standard 1742.7</i> and <i>Railway Crossing Safety Series 2011, Plan: Establishing a Railway Crossing Safety Management Plan</i> (NSW Roads and Traffic Authority, 2011) and Safe System Assessment.
B11-15	B11.4.1	The applicant advises ‘ <i>ARTC standard signage would be used</i> ’.	All signage on and for traffic on public roads must comply with Australian Standard AS1742.7.
B11-15	B11.4.1	The applicant advises ‘ <i>the presence of level crossings may present safety risks to motorists due to potential collisions with trains</i> ’	The submitted documentation needs to include an assessment of other risks such as infrangible infrastructure in the clear zone, adverse road alignments, end of queue rear end crashes, platooning of traffic and overtaking, etc.
B11-17	B.11.4.2	The applicant advises ‘ <i>changes to roads would be undertaken in accordance with the minimum safe standard of the existing road</i> ’	Any work on the classified road network needs to be in accordance with <i>Austrroads</i> and relevant TfNSW supplements (ie current standards).
B11-17	B11.4.2	Impacts of property severance	Current access across affected property owner's land is unfettered whereas use of a public road

			requires vehicles that can be and are registered, and drivers that can be and are licensed and operating within the terms of the licence. There are also potential implications should people with displaced travel routes fail to use the public road system as envisaged or where they decide to continue old practices but cross the railway wherever accessible. Further consideration of providing access across IR for severed lands is required.
B11-18	B11.5.2	Inadequate consideration of impacts on existing road environment.	The NSW Government has committed to a target of zero deaths and serious injuries on NSW roads by the year 2056 (NSW Road Safety Plan 2021). Rail-road interfaces and road related areas associated with the Inland Rail must be designed and operated under the Safe System philosophy. Traditional approaches to road design, risk management in the road environment and traditional road related risk assessments are inadequate and do not align with the commitments, strategy and aspirations of the NSW Government. The new railway must be planned, designed and managed to eliminate death and serious injury on the impacted road network.
A7-6 & A7-9	A.7.3.5 & A7.3.6	Narromine West connection and connections with other rail lines are inconsistent.	Part E Maps and Parts 4 and 5 are inconsistent and require alignment.

## APPENDIX B - General Comments

Issue	Comment
Risk Level	The building of the Inland Rail introduces new risks to the road environment. At present, where a railway does not exist, the risks associated with level crossings and rail interfaces are non-existent. The railway introduces new risks through the realignment of roads and the introduction of level crossings, and the introduction of infrangible structures in the road run-off area (clear zone). Risk assessments based on the SFAIRP model are inadequate, they are aligned with assessing risks at existing infrastructure - this is not the case with the majority of the Narromine to Narrabri section. As such, the highest level of risk associated with the introduction of the railway and burdened upon the road user and road manager needs to be no greater than negligible.
Sight distance at Level Crossings	Environmental risks do not appear to account for the need to maintain sight triangles at passive control level crossings. Ensuring sighting is adequate may require clearing in private land or State Forest to a width greater than the nominal rail corridor.
Train Length	The EIS is based on operation of 1,800m long trains, but flags the later introduction of 3,600m long trains. To aid in future-proofing the project, all traffic, transport and road safety assessments must take the future length of trains into account.
Vegetation control in rail corridor	The risk of fire emanating from within the rail corridor needs to be mitigated through appropriate management of the fuel load within the rail corridor. Similarly, the spread of

	noxious and other weeds must be mitigated through appropriate surveillance and management.
Social Impact Management	To promote community confidence in the management of social impacts the Social Impact Management Plan is to be made available online in accordance with the draft <i>Social Impact Assessment Guideline for State significant projects</i> (October 2020).
Lighting of level crossings	The RMS (now TfNSW) <i>Guideline Lighting for Railway Crossings</i> provides for the provision of lighting at all public level crossings and must be used to determine the need for lighting. Wherever practicable, lighting is to be provided on all sealed roads, and on unsealed roads with poor alignment that are trafficked at night. Road lighting is recognised as reducing crash risk at night by around 30%.
Driver set-back	AS1742.7:2016 provides a driver set-back (Ld) value (the distance from the driver to the front of the vehicle) of 1.5m. Long nose heavy vehicles have a driver set-back of approximately 2.5m. This should be accommodated on freight routes and in rural areas, and considered at Private level crossings where trucks and primary industry vehicles use a passive control level crossing.
Interface with other rail corridors	At locations where the Inland Rail corridor interfaces with other rail networks or sidings, the applicant needs to demonstrate that trains moving between the networks are not held across public level crossings when moving between the Inland Rail corridor and existing rail corridors, and that shunting manoeuvres will not occur across public road level crossings.
New level crossings	The applicant must comply with TfNSW's level crossings policy in order to obtain approval to construction of new level crossings. Approval for the installation or removal of (road) traffic control devices is a function of TfNSW, with certain devices delegated to local government on roads other than State roads. Only TfNSW holds the authority to approve the installation or removal of internally illuminated devices, and of speed limits, on all roads.
Fencing	The EIS states temporary site fencing will be installed to ensure construction areas and areas to be impacted are clearly delineated. However, it does not contain information regarding permanent fencing along the leased network boundaries upon construction. The proposed leased network boundaries will be required to be re-defined and agreed upon.