

File No: 14.03.01  
Contact Person: Melissa Ward

17 August 2017

Department of Planning and Environment  
Major Projects  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam,

**RE – Parkes to Narromine EIS submission – Inland Rail**

Thank you for the opportunity to comment on the Parkes to Narromine Environmental Impact Statement for the Inland Rail. Council provides the following comments in relation to the proposal.

***Roads and road impacts***

***Bus and pedestrians in rural areas***

Rather than of a general nature, targeted consultation with local bus drivers to determine pedestrian movements close to rail lines would be more beneficial. The ability of children and workers to easily get to a bus and to school is obviously very important and the work on the rail should not be impacting on this. Targeted consultation with emergency services and postal contractors would also help to complete the picture of impacts on access to rural properties.

***Rural road busy times***

The EIS states that the busiest period for our rural roads is during winter crop harvest from approximately October to December with November being the busiest period. This is true however there is also a summer crop harvest or picking season when our roads are just as busy, being from approximately April through to June. The roads taking this produce to storage, on-selling and processing facilities will need to be unimpeded during these times.

***Outdated crash data***

The crash history tables show data from 2009 to 2013. Whilst informative, revised or updated data, noting that following this time new roads have been opened up as road train routes, could provide a better picture of increased traffic and hence points of conflict.

## ***Trackwork***

The EIS states that the lift size of the track where the track needs to be lifted up to meet current standards, is 'varied'. This doesn't give an accurate picture, particularly where the track will need to be lifted substantially to be free from flood. A range such as between 'x' and 'y' would be beneficial in giving an idea of the scope of height.

A more detailed picture of raised track work is shown in the flooding section of the EIS where sections of track are needed to be lifted due to overtopping by the 1% AEP flood. Whilst this is necessary, with increased height comes increased operational noise and the noise can then travel for a longer uninterrupted distance. Noise attenuation measures will therefore require some thought in these locations where a number of sensitive receivers are living close by.

## ***Construction Traffic***

The EIS cites the Newell Highway as the busiest road involved with construction traffic for the southern section of the works. However, the EIS is silent on local roads which may be impacted by construction traffic in the northern section (Peak Hill to Narromine). This is most important and of relevance to Narromine Shire Council's core business of maintenance of rural roads within a limited budget. Please advise if this will be assessed as part of another study.

## ***Soil mounds***

The EIS states that spoil mounds will be placed adjacent to the track yet still within the confines of the rail corridor. As the rail corridor currently dissects large areas where regional bodies of water sheet towards the west, the impact of the damming effect this could create needs to be investigated. Any diversions of water during wet periods can have disastrous impacts on cropping areas and hence directly impact on farming incomes.

## ***Hours of operation***

Whilst it is understood that the Inland Rail will need to be constructed in as quickly a time period as possible, the hours during which construction will take place should reflect the proximity to nearby sensitive receivers. Impact for rural residents could be greater as the background noise levels in rural areas are much less than in towns and cities. Catch-up time could be gained in areas where limited dwellings are located.

## ***Flood Impacts following construction***

Section 15.3 details that in the 1% AEP flood event, certain sections of the Peak Hill Railway Road and the Wyanga Road will have an increase in the maximum length and depth of inundation of the road following completion of the track works. If a developer were proposing such impacts on local roads as a direct result of the works they were completing, Council would be advising them to either:



- a) Redesign their development to ensure that no additional impact on local roads would result from the development, or
- b) If a redesign of the development were impossible/not warranted and the development is still supported, enter negotiations with Council to arrange a financial contribution, or VPA, where monies contributed can be spent on rectification works.

Whilst it is understood that the frequency of flooding predicted is not often, impacts on local roads including the Tomingley West Road, Peak Hill Railway Road and Wyanga Road are also seen for lesser frequent flood events including the 1 in 10 year event.

**Narromine Shire Council stresses here the importance of the ARTC making contact with Council to determine an appropriate way forward considering the impact predicted on our local roads where funding is always limited.**

Council also recognises that the flooding impact on Tomingley Road is lessened with the proposed works and as such we are willing to work with the ARTC to come to a robust yet fair solution.

Coupled with the above is the statements made in the EIS regarding the proposal having less impact via increased flooding due to limited people or infrastructure in the area. It is true that with less population in an area there is less risk to human life however with increased impact on Narromine's productive agricultural land, this will reduce the land's productive capacity and place greater pressure on other lands to either be further utilised beyond their capacity or converted to non-agricultural uses which is a larger issue at odds with the Department of Planning and Environment's directions. Any diversion of floodwaters onto paddocks not previously flooded will impact on farm budgets with flow on effects to employment, productivity and ultimately GVAP (gross value of agricultural production).

### ***Subsequent stages of the Inland Rail***

Council has been made aware that due to a lesser cost involved with subsequent stages of the Inland Rail as it passes through the Narromine Shire that the SEPP (Infrastructure) could be utilised instead of the development being captured under the category of state significant infrastructure and therefore could be prepared as a 'Part 5' development with nothing forcing preparation of a comprehensive EIS. Council believes that due to the controversial nature of the location of the new rail line as it heads north from this Parkes to Narromine section should be considered state significant and go through the same assessment procedures as this stage of the line. This allows for greater transparency with the planning for the new route and increased opportunity for community consultation.

Please contact Council's Manager of Planning on 02 6889 9954 if you require any additional information in relation to the above.

Yours faithfully



Melissa Ward  
**Manager Planning**