

Enquiries to: Angus Witherby
Direct Line: (02) 6757 3250
Email: angus.witherby@mpsc.nsw.gov.au
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15 December 2017

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

Via web-portal submission

Attn: Mick Fallon

Dear Mr Fallon,

Submission on the Narrabri-North Star segment – Inland Rail Proposal

Introduction

This submission has been prepared by Angus Witherby, Director of Planning and Community Development on behalf of Moree Plains Shire Council. The submission was endorsed by Council at its meeting of 14 December 2017. While it is noted that Council strongly supports the overall project and considers that it is highly significant in terms of the economic development of the Shire, region, inland Australia and eastern seaboard, Council has a number of concerns that it requests be fully addressed in the Government's consideration of the project and the application of relevant conditions.

Council would like to commence by expressing its disappointment in terms of the response of the final EIS to matters raised in the adequacy review. While a number of these matters were quite minor it is nevertheless disappointing that simple wording corrections were not made to improve clarity. Of more significance and a major disappointment is the lack of response to all substantive issues identified as part of the adequacy review where the draft EIS did not provide an appropriate platform for decision-making on the proposal, without significant additional conditions being applied. In Council's submission the intent of an EIS should be to point towards key elements of the project and the way in which it would be conducted so that it is not necessary to place significant additional requirements on any approval.

Given the significant shortcomings identified in the EIS have not been addressed, Council respectfully requests that serious consideration be given to each of the major issues raised below and that appropriate conditions be applied. While it is noted that a number of matters will require refinement at the detail design level it is nevertheless disappointing that clear "pointers" to what needs to be addressed at detailed design level has not always been provided.

Preferred route

The "base case" predominantly utilises the existing rail corridor however there are two sections of new track proposed. These include the Camurra Bypass (addressing an existing sharp "hairpin" turn in the

track north of Moree) and a rebuild of an existing overpass of the Newell Highway north of Narrabri. Council has no objection to the new sections of track as proposed for these two elements.

Eastern Bypass

The EIS also addressed an eastern bypass of Moree Township. This option was included at the request of Council, and a number of preliminary designs were discussed with the ARTC and their consultants. While Council would still have preferred a location for the main line east of Moree Township, and is concerned that this option was not fully explored, it is understood that a through-town route has been identified as preferred.

Key Point: Council remains of the view that an Eastern bypass is the preferred option given the long-term nature of the project but accepts that a through-town route is preferred in the EIS provided that all amelioration measures outlined below are implemented by way of condition.

Impacts of a “through town” route

Given the ultimate route selection is through Moree Township, it is essential that the impacts of this are fully addressed. Council has previously made submission on these impacts which include severance of the eastern and western portions of the town, impacts on emergency services access, community cohesion, corridor security and amenity impacts including noise. These issues have not been fully resolved in the EIS. Further, there is considerable design detail required on the proposed Jones Avenue overpass which on its own is not considered adequate to address severance impacts.

These impacts are such as to require full corridor isolation together with other amelioration measures in order to reduce overall impacts on the Moree community.

Severance

As outlined above there are a number of traditional movement patterns between Stanley Village and other parts of East Moree to key destinations in Southwest Moree as well as towards the Mission in West Moree and the town’s commercial areas. Vehicle ownership is low and many people walk considerable distances (two, three, 5 km) to access social interaction and services and facilities. There is currently no public transport to East Moree. In this situation any measures which would require additional walking distance or which fail to provide for existing key movement patterns are not satisfactory.

The three key movement paths that have been identified include Jones Avenue, Anne Street and the Gwydir Highway. As proposed, the project would facilitate additional movement at Jones Avenue however the Anne Street movement would not be addressed. This requires a grade-separated pedestrian overpass.

Corridor Security

Corridor security is a current significant issue and to achieve adequate corridor security requires unclimbable barriers along the length of the through-town section between Bullus Drive and the Mehi River Bridge. To a large extent achieving appropriate acoustic protection would also require barriers of this type. Issues arise, however, wherever these barriers would be penetrated by an “at grade” crossing.

This is a current risk at the Gwydir Highway rail crossing which provides open access to the rail corridor. A similar situation occurs with the current foot access to the Moree train station.

In order to achieve adequate corridor security grade separation should be considered for the Gwydir Highway, a pedestrian overpass at Anne Street, and an upgraded overpass at Jones Avenue. All grade

separated crossings would require full security treatment including “cages” to prevent the throwing of projectiles together with effective lighting and CCTV. Double foot paths with shared cycle capacity should be provided to any road-based over-bridge.

Emergency services access

It is considered that the EIS is over-optimistic in terms of the degree to which existing at-grade crossings would be affected by future train movements. In this regard it is noted that the service offer looks to a potential for 3.2 km trains in the future and that these may reach up to 40 trains per day. This, in Council’s submission, requires grade separated access to ensure emergency service access at all times to East Moree. Police, fire, SES, RFS and ambulance are all located west of the railway line. The proposed Jones Avenue overpass would address this in part however there is still the issue of emergency vehicles being caught in significant queuing while waiting for a train to complete its crossing.

Heavy vehicles

A further issue is that a 3.2 km train could, conceivably, block both the Bullus Drive and Gwydir Highway level crossings. This would leave the community dependent on the single Jones Avenue overpass with an inability for heavy vehicles to cross the highway without very substantial detours. This means that the Jones Avenue overpass needs to be configured to address heavy vehicles. At a very minimum this should include a B-Double although ideally grade separation for high productivity vehicles should also be provided. It should be noted that Jones Avenue together with Edward Street is currently the wide load route through Moree and also provides a key link for traffic travelling from the west on the Gwydir Highway moving through to industrial and grain handling areas in the east.

Changes to local road networks

The Jones Avenue overpass together with any other road overpasses provided will have impacts on the local road network within the Moree Township. As part of detailed design the impacts on the local road network should be modelled and assessed as well as impacts on heavy vehicle movements through the township.

Acoustic impacts

Acoustic impacts from trains at the ultimate design level will be significant and will not be fully able to be ameliorated by noise control walls. A common approach to this issue is to seal buildings and utilise double glazing to address acoustic transmission. The Moree climate is hot and many buildings rely on evaporative cooling rather than refrigerated air conditioning. This is effective in the climate and is significantly cheaper to operate although it requires more than one window to be kept open. This is a significant limitation in terms of the ability to provide acoustic treatment to affected buildings. As part of any approval consideration should be given to the development of a compensation scheme together with appropriate acoustic treatments to address buildings that would not be compliant at the ultimate design year. Such compensation would address higher energy costs associated with a shift to refrigerated air conditioning.

Detailed design – overpass(es)

Scant consideration has been given in the preliminary design of the Jones Avenue overpass to impacts on adjoining properties and the need to maintain appropriate property access during construction phases. Further, it is unclear whether specific property resumption might be required and this should be determined at an early time during the detailed design phase.

Consultation with potentially affected landholders should occur in terms of identifying alternative properties and maintaining business continuity.

To summarise, the following key infrastructure elements are required to support a through-town route:

- Full investigation of grade separation of the existing Gwydir Highway/Inland Rail crossing (noting this would need a review of the intersection with the current Moree bypass);
- Enhancement of the proposed Jones Avenue overpass to cater for heavy vehicles (at least to B-Double standard given the key role this overpass would play in access to Council's industrial areas); and
- Provision of a dedicated pedestrian access along the Anne Street alignment which would also provide access to Moree railway station by way of ramp and lift.

Key Point: The through town option as now adopted in the EIS raises a range of interconnected issues that require close attention and appropriate conditioning. These include severance, corridor safety, emergency service movement, heavy vehicle movement, impacts of overpass construction and acoustic treatment. In addition, any concrete barriers required need to be treated to address visual amenity (perhaps including some form of screen planting or other treatment as might be developed in consultation with the community). In Council's view full corridor isolation from the Mehi River to Bullus Drive should be implemented.

Impact on regional high productivity vehicle access

A primary purpose of the Inland Rail Project is to facilitate the movement of agricultural commodities. In fact the route neatly bisects the Eastern Australian wheat belt.

Despite this, the project EIS does not specifically address the movement of agricultural commodities from the north and west of the Shire across the inland rail corridor to the existing grain handling facilities, all of which are east of the existing Highway/rail corridor.

Once in full operation, the rail corridor would be a significant barrier to east-west movement. This is a particular issue given the minimal vehicle stacking distances between the Newell Highway and the rail corridor. Particularly as there is increased attention to using high productivity vehicles this situation would only get worse. Council has previously noted to the ARTC that average annual daily traffic volumes are not a good indicator of overall loads on the road network which are strongly dictated by the "harvest peaks". Consideration of queuing and also level of service at existing crossings needs to take these peaks into consideration which was not done as part of the EIS traffic review. In Council's submission such a review would demonstrate unacceptable levels of service at the current main level crossing access points, let alone into the future.

Grade separation across the corridor is therefore considered vital as part of an East-West connector between the Newell and Gwydir Highways. Preliminary concepts have been developed for an East West connector between the Gwydir and Newell Highways essentially providing a bypass of the Moree Township for high productivity vehicles. This is considered necessary to optimise access to both existing and planned intermodal facilities located in South East Moree east of the existing road/rail corridor and south of the Inverell railway line and would likely be located some 6-8km south of Moree. This access is currently the subject of a transport study funded under the Murray-Darling Regional Economic Diversification Program and a preferred route and configuration is anticipated to be identified by April 2018. Consideration should be given to the Inland Rail Project contributing to a grade separated overpass of the railway corridor south of Moree Township to facilitate high productivity vehicle access. This overpass is also addressed in the transport study.

Additional upgrades are also required to facilitate traffic from the Carnarvon Highway reaching existing and proposed Intermodals and industrial areas, noting a primary access is the Gwydir Highway level crossing.

Flooding

This issue relates to flooding impacts on the Township of Moree and nearby areas as well as flooding impacts along the route as a whole including a number of local roads.

Impacts on local roads and agricultural land are relatively minor however require attention at the detailed design stage. Appropriate conditions should be considered to minimise the time-impact of additional flooding on local roads (perhaps to an additional hour) as well as conditioning minimal additional flooding impacts on agricultural land. Detailed attention to culvert design is necessary at design stage. This needs to reflect the specific characteristics of local soils and erosion characteristics.

A management plan for culvert and drain maintenance (including clearing as necessary) should be conditioned.

Currently the base case is that the project should not worsen flooding for Moree Township and environs. While this has been generally achieved in terms of the EIS flooding review, it is noted that the EIS identifies that there may be an increase in the number of dwellings impacted. This is considered unacceptable and at the very least there should be no increase in the number of dwellings impacted.

It is noted that in 2012 a wash-out occurred which materially affected flooding in Moree township. This has been modelled by Council. Detailed design needs to address the specifics of that event when considering the impacts of the project and the proposal to raise (and presumably flood proof) parts of the line.

There is also an opportunity at detailed design stage to potentially improve flooding impacts on Moree as compared to the present. Council is keen to work with ARTC through the detailed design phase to achieve optimum outcomes for Moree and environs. In this regard Council has made available its current flood model and is willing to further collaborate as knowledge gained from the current modelling is worked through in policy terms. Given Council is intimately involved in addressing flood issues in Moree at the present time, Inland Rail needs to continue to be engaged throughout the design phase and construction delivery and it is considered appropriate that this be conditioned.

Council has commissioned an independent review of the flooding component of the EIS which is appended.

Key Point: Council continues to hold the view that the “base case” should be no worsening of the effects of flooding and that opportunities should be taken through the detailed design phase to improve flooding outcomes where possible. Council acknowledges that in some cases improving outcomes in one area may change outcomes for the worse in another and wishes to be fully involved in the development of the detailed design so as to minimise any negative impacts. Care is needed to ensure that culvert design and management practices are sustainable into the future.

Biosecurity

The project is a linear project and will also generate significant traffic movements within the Shire and the region during both its construction phase and operational phase. This will include significant importing of and movement of materials. Detailed consideration to biosecurity needs to be given as part of the construction and operation environmental management plans for the project.

Disappointingly, the EIS has focused consideration on weeds of national significance. Weeds of local and regional significance also require careful consideration as does the development of strict protocols to prevent weed movement associated with either the construction of the project or along the corridor after project completion. Further, the NSW weeds legislation has now been replaced by biosecurity legislation and this needs to be fully assessed in the development of the relevant management plans.

Council requests that these aspects be conditioned in order to ensure best practice in biosecurity through both construction and operation of the project.

Key Point: Significant upgrading of the approach is required to achieve best practice in the biosecurity area. This should be appropriately conditioned as part of the construction and operational management plans. Advice can be provided from Council's Biosecurity Officers of key risks and concerns. Formal consultation should occur with Council in the development of the biosecurity management plan.

Local rural road impacts

The construction process will have significant impact on local rural roads. This will include a number of black soil roads which provide access to properties as well as connectivity across the existing rail corridor. Of particular concern is to ensure that the local road network is restored to the same condition post-construction as pre-construction. Council requests that a dilapidation survey be conditioned prior to the commencement of construction works involving all relevant local roads. In this regard it is understood that ballast may be obtained from either new or existing quarries east of Moree (including in Gwydir Shire) and there is a strong potential for extensive use of the local road network in bringing in materials.

A further issue is the time-sensitive nature of construction and how this can potentially create major damage to black soil roads during or shortly after rain events. Council has had previous experience of time critical project construction causing significant local road damage.

Further, the construction process needs to minimise disruption for local landholders. This can potentially occur through roads being damaged so as to be un-trafficable until repaired but can also occur through time-scheduling of key construction elements that clash with key local road movements - for example those associated with the harvest period. A construction impact management plan should be conditioned to address these issues, such plan being developed in close consultation with landholders and Council.

Key Point: A full dilapidation survey should be conditioned to cover all local roads that would be affected by construction traffic both with Council areas directly traversed by the route and also adjoining Councils where these are a source of construction material. Roads should be returned to at least pre-construction condition.

Key Point: Full consultation with landholders and Council is required to ensure construction disruptions are minimised. This should be conditioned as part of a construction management plan.

Level crossings (outside Moree Township)

Both formal and informal level crossings need to be addressed. It is understood that the formal level crossings would not undergo any closure however subject to landholder negotiations some relocation may occur to optimise safety and usability outcomes.

Council understands that a number of informal crossing points they also exist. Close consideration needs to be given to addressing these in particular to ensure that farm severance does not emerge as a significant issue. Again this reinforces the need for comprehensive landholder consultation.

Key Point: Consideration needs to be given to any informal crossings and, where possible, suitable arrangements made that would minimise farm severance. Any changes proposed to formal crossings, including closure during construction, needs to be the subject of full consultation with affected landowners to minimise impacts on farm operations.

Consultation

Overall consultation during the project to date has been of good quality and thorough, although there has been a need to re-consult as the project moves through different phases and different personnel, organisations and bodies are involved. Recent consultations during the EIS exhibition process were well-received by the community. These have generated community expectations regarding consultation during both the design development phase and the construction phase.

The EIS did not, in Council's submission, place adequate emphasis on landholder consultations (as distinct from the more generic stakeholder consultations) and Council requests that this be appropriately conditioned as part of a landholder and other stakeholder consultation plan that sets out a detailed and thorough consultation strategy. This needs to include conflict resolution strategies where there are differences of view with landholders and other stakeholders.

Key Point: A detailed consultation strategy and plan should be conditioned that focuses on landholders as well as other stakeholders. This should include a conflict resolution process.

Dust

There is an opportunity to undertake additional regional base-line monitoring during the design phase and prior to construction. This should be conditioned so as to ensure relevant base-line monitoring, in particular during harvest periods where ambient conditions are worse, and there is less capacity for dust generation while achieving NSW EPA guidelines. Unsealed roads are a major potential dust generator which need to be addressed as part of the construction environmental management plan.

Key Point: Regional dust monitoring can be undertaken prior to construction to provide better base line data. This should be conditioned and should inform the construction environmental management plan.

Local Contractor Engagement

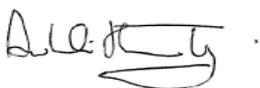
Council is in receipt of submissions indicating concern that local contractors and, in particular local Indigenous communities will not have adequate opportunities to be engaged in the construction and maintenance of the project.

Key Point: Local contractor and Indigenous community input should be conditioned by way of a local construction and maintenance engagement plan that stresses engagement of indigenous communities.

Council continues to progress its plans to become "Inland Rail Ready" and is working to ensure that complementary development including intermodal and distribution hub facilities and planned to take best advantage of Inland Rail, including the identification of core supporting infrastructure. Council remains strongly committed to, and supportive of the project.

Council would be happy to expand on any of the matters raised, and to discuss with the Department potential conditions.

Yours sincerely



Angus Witherby

DIRECTOR PLANNING AND COMMUNITY DEVELOPMENT