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20 December 2017

Mick Fallon
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NSW Government Department Planning and Environment

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Dear Mick,

RE: Environmental Impact Statement for the Narrabri to North Start Project

Thank you for the opportunity to make a submission on the Environmental Impact Statement (EIS) for the Narrabri to North Start Project (**Project**). Council appreciates the extension to 20 December 2017 that you provided for this submission which enabled Council to discuss the matter at the Ordinary Council Meeting on 19 December 2017.

Traffic, Transport and Access

1. The EIS concludes that travel times along the Newell Highway are expected to be maintained at existing levels, with no impact as a result of the operation of the Project. Council considers this to be essential and asks that the NSW Government Department Planning and Environment (**DPE**) thoroughly examine the EIS in the assessment of the Project to ensure that this conclusion is correct.
2. For roads which cross the rail line at a level crossing, an increase in delay is expected, according to the EIS, with 86 existing level crossings crossed by the Project, including 45 of which are on private roads. According to the EIS the delay of traffic at level crossings is not substantial and there is capacity at each level crossing for delayed traffic to queue clear of adjacent intersections. Council considers that minimising delays to traffic and ability to cue safely is essential and asks that the DPE thoroughly examine the EIS in the assessment of the Project to ensure that these conclusions are correct.
3. Council asks that site specific Construction Traffic Management Plans be prepared and required as a condition of consent.
4. Council asks that where construction occurs during harvest time that the major storage sites and heavy vehicle transport companies be given prior warning of works that will affect truck movements and that this be required as a condition of consent.
5. Council asks that it be informed of all changes to level crossings and detours during construction and that this be required as a condition of consent.
6. Council asks that any new track be constructed on the western side of any level crossing, as a new track on the eastern side will reduce the stacking/queue length for heavy vehicles and that it be specifically consulted on any instances where this is not possible.
7. Council asks that the DPE satisfy itself, by a thorough examination of the EIS in the assessment of the Project, that the current operation of the Newell Highway will not be detrimentally affected by the operation of the Inland Rail.

Noise and Vibration

8. The EIS states that a total of 152 residential receivers were found to exceed the noise criteria established by the NSW Rail Infrastructure Noise Guideline and suggests that residential receivers will require some form of noise and vibration mitigation for impacts associated with the proposal to be managed. Council asks that the implementation of noise and vibration mitigation measures be required as a condition of consent.

Flood impact

9. At a local level the EIS concludes that a total of seven structures are expected to experience increased flooding impacts as a result of the Project. At a regional level the EIS concludes that an additional 23 properties could be impacted during the one per cent flood event, however, additional modelling at detailed design would be required to confirm these impacts. Council asks that all necessary flood modelling be undertaken to confirm that extent of any impacts on properties and that all necessary flood mitigation measures are implemented to ensure that impacts are appropriately managed and that these be required as a condition of consent.
10. Council asks that the Proponent be required to investigate any potential opportunities to mitigate flooding for towns within the Project area through the alignment of the Project or other works as a secondary benefit and that Council be specifically consulted on this.

Social and economic impact

11. Council asks that landholders are provided with a level playing field and fully consulted in any property acquisition and land access discussions and that as far as is reasonably practicable the operation of rural properties is not detrimentally effected by operation of the Inland Rail.
12. Council reiterates the availability of accommodation in Narrabri and Boggabri for large construction personnel and asks that it be consulted during the preparation of the workers housing and accommodation plan.

If you wish to discuss the matter please contact me on 02 6799 6882 or danielb@narrabri.nsw.gov.au

Yours sincerely,



Daniel Boyce

ACTING DIRECTOR DEVELOPMENT AND ECONOMIC GROWTH