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File No: SF17/52552
Ref No: DOC17/560755

Mr Mick Fallon
Senior Planner, Transport Assessments
Department of Planning and Environment
Level 29, 320 Pitt Street
SYDNEY NSW 2000

By email: Mick.Fallon@planning.nsw.gov.au

Dear Mr Fallon

**RE: REVIEW OF ENVIRONMENTAL IMPACT STATEMENT FOR INLAND RAIL -
NARRABRI TO NORTH STAR (SSI 7474)**

I refer to your letter received on 14 November 2017, regarding the Inland Rail Narrabri to North Star Environmental Impact Statement (EIS). I note that this proposal is located within the existing rail corridor between the town of Narrabri and the village of North Star, via Moree. It involves upgrading/replacement of the existing rail line between Narrabri and North Star (188 km) to meet the operational requirements for Inland Rail.

The Heritage Division, as delegate of the Heritage Council of NSW, has reviewed the following EIS documentation:

- *Inland Rail Program: Narrabri to North Star Project, Environmental Impact Statement*, prepared by GHD Pty Ltd, 3 November 2017.
- *Technical Report 9: Non-Aboriginal Heritage Impact Statement*, prepared by Umwelt, October 2017

No NSW State Heritage Register (SHR) items are located within the proposal area. Three s170 heritage items listed are located within the area.

- Mehi River rail bridge (ARTC's section 170 heritage register).
- Gwydir River rail bridge (ARTC's section 170 heritage register).
- Moree Station (Railcorp's section 170 heritage register and Moree Plains Local Environmental Plan 2011).

In addition, the Croppa Creek rail bridge has been identified as a potential heritage item of local significance. Nine heritage listed items are located within 80 to 100 metres of the proposal area.

Rail Bridges

The proposal involves demolishing the Mehi River, the Gwydir River and the Croppa Creek rail bridges (assessed as having local significance), as some of their elements are not compatible with Inland Rail requirements. After demolition, new wider bridges will be constructed in the same location. The EIS indicates that a review of the existing structures with Inland Rail requirements determined that there were several issues associated with the existing bridges.

- The existing steel truss girders are not compatible with Inland Rail vertical clearance requirements.

- There are a number of structural defects in the existing bridges associated with timber degradation.
- The existing piers would be unable to handle Inland Rail design loadings.

The option of upgrading these bridges or building new bridges next to them was considered in the EIS, but discounted due to ongoing maintenance requirements and safety issues. It is the Heritage Council's preference for the rail bridges to be retained and strengthened rather than demolished.

The main justification for demolition presented in the EIS is that there are numerous examples of the steel Pratt truss bridge type within NSW (The 2011 ARTC Section 170 Heritage and Conservation Register lists over 20 steel truss underbridges). However, it is our view that these bridge examples are part of a decreasing resource across NSW and the cumulative impact of the proposed loss of another three examples of this type poses a heritage risk.

The entire Inland Rail project will run between Melbourne and Brisbane, divided into 13 separate project areas. The Narrabri to North Star project is one of the seven projects that will be completed in NSW. It is highly likely that more steel bridges will be impacted by the Inland Project. Therefore, a strategy for the ongoing conservation, care and management of steel truss bridges on the ARTC network should be developed as a priority.

Railway Stations

There are 13 former railway station sites and one existing station (Bellata) located within the area. Most of the line's closed stations were demolished in the 1970s and 1980s. There is limited remaining evidence of the stations, except for raised earthen embankments indicating former station platforms or rail siding loading banks.

The proposed works through Moree Railway Station will follow the existing alignment and include a track slew of 125 millimetres to enable clearance from the existing station platform. This will require a change in the boarding platform used by the Sydney Trains. However, no heritage features will be directly impacted by the proposal. As the railway station is located immediately adjacent to the proposal site there is potential for construction and operational vibration impacts.

The intact railway stations at Edgeroi, Bellata and Gurley will not be directly impacted by the reconfiguration of the existing track in the area.

Archaeology

The following document was reviewed by the Heritage Division and has informed the following comments:

- AUSTRALIAN RAIL TRACK CORPORATION INLAND RAIL NARRABRI TO NORTH STAR EIS, Non-Aboriginal Heritage Impact Statement FINAL Prepared by Umwelt (Australia) Pty Limited on behalf of Australian Rail Track Corporation, October 2017.

The above report has found the proposal has the potential to impact remains associated with the former Aboriginal fringe camp site ('Steel Bridge Camp') located near the Mehi River bridge. Dispersed artefacts associated with Aboriginal life at the former Steel Bridge Camp at the Mehi River may be present and would fall within the definition of archaeological 'relics' as provided by the *Heritage Act 1977* (New South Wales (NSW)). Evidence relating to Aboriginal settlement following 'contact' with European settlers may be covered under both the *Heritage Act* and the *National Parks and Wildlife Act 1974*. If present 'contact period' archaeological remains at the Mehi River Underbridge have been assessed to have high research potential and be of high significance (SoHI page 103 – 104). The Heritage Division

notes that the use of 'high significance' is not in accordance with Heritage Council guidelines which require assessments to identify items as of local or State significance.

The EIS recommends: An archaeological management sub-plan would be prepared as part of the CEMP to define the measures to be implemented during construction at the former Aboriginal fringe camp site near the Mehi River bridge. The plan would provide requirements for archaeological management, including a research design methodology. This is considered appropriate. The need for an Aboriginal Heritage Impact Permit (AHIP) under the *National Parks and Wildlife Act 1974*, should be determined.

General Comments

It is noted that detail of the EIS' design and construction approach is indicative only and will be subject to further detailed design and construction planning. The Heritage Division recommends the need for further consideration of heritage impacts during the detailed design of this project, including ongoing input from heritage specialists and the Heritage Division.

It is noted that several heritage items and potential heritage items are located near the project area and will not be directly impacted during the proposed works. If it is identified that any of these items are to be impacted during the development of detailed design, then an updated heritage impact assessment is required.

Recommended Conditions

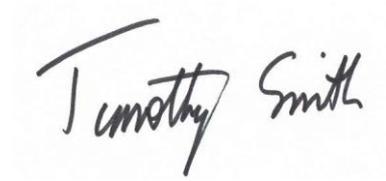
The Heritage Council agrees with the mitigation measures as listed in Section 18.4 *Mitigation and Management* (Table 18.2) of the EIS. In addition, the following conditions are recommended.

- A suitably qualified heritage architect must be integrally involved in the detailed design development for all the proposed project's components.
- A Rail Bridge Conservation and Management Strategy must be developed that outlines both operational and heritage considerations and applies a methodology to determine which of the rail bridges represent better candidates for long-term conservation within the ARTC rail network.
- The demolition of the Mehi River Underbridge at Moree is not supported. The underbridge is a visible landmark from the Moree Bypass (A39) and should be retained as an example of a steel Pratt truss bridge constructed on the Pioneer Line using American Bridge Technology. The bridge should either be strengthened or duplicated. If the bridge is to be duplicated, the new structure should be located to the east of the existing bridge to retain sightlines from the A39.
- Any new bridge structures constructed should incorporate design elements from the existing steel truss bridge design to mitigate visual impact.
- Heritage elements within the Moree Railway Station must be protected during construction works.
- Photographic archival recording must be carried in accordance with the NSW Heritage Division publications *How to prepare archival records of heritage items* and *Photographic Recording of Heritage Items using Film or Digital Capture*.

If you have any questions regarding the above matter please contact Alexander Timms, Heritage Officer at the Heritage Division, Office of Environment & Heritage on (02) 8837 6067 or at alexander.timms@environment.nsw.gov.au

Thank you for the opportunity to provide comment on the proposal.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

TIM SMITH OAM

Director Heritage Operations

Heritage Division, Office of Environment and Heritage

15 December 2017

As Delegate of the Heritage Council of NSW