# GrainCorp Response Submission to Inland Rail N2N EIS

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# Submission Summary

GrainCorp Limited (GrainCorp) supports the proponent Australian Rail Track Corporation Limited (ARTC) for construction and operation of the 306km Narromine to Narrabri (N2N) section of the Inland Rail project (the Project), which includes rail track and associated facilities in a new rail corridor.

GrainCorp has reviewed the Environmental Impact Statement (EIS) for the Project as it relates to its grain storage and handling sites at Narwonah, Narromine, Curban, Gwabegar and Narrabri. The review also considers impacts to the wider grain growing districts surrounding the Project extent.

The review identified areas where the EIS fails to adequately assess impacts, where additional information is expected to be provided by the proponent and outlines those areas of importance to GrainCorp where a role in future consultation is warranted.

<u>Traffic and Transport</u>

- GrainCorp requests the EIS detail the approval process required to permit the commencement of 3,600m trains on Inland Rail and specify thresholds of incremental change *not* needing consent/approval.

- GrainCorp is concerned an operational degradation issue exists for the east-west movement of regional freight traffic and the need exists to facilitate access to existing and proposed intermodals, industrial areas and GrainCorp sites.

- GrainCorp disputes the assertion “the proposal would not have any impacts to train paths when in operation” and instead suggests that Inland Rail mainline priority and existing train priority matrix would mandate impacts to regional train scheduling and operations.

- GrainCorp requests the EIS demonstrate why the proposal has minimal connectivity to Inland Rail, particularly in high production agricultural areas where there is an opportunity for road freight movements to be shifted to rail.

- GrainCorp has concerns the EIS fails to provide a complete assessment of the impact to the region’s roads and any subsequent negative outcome for the transport of grain to GrainCorp facilities.

- GrainCorp requests that a Rail Possession Strategy and Traffic, Transport and Access Management Plan be prepared in consultation with GrainCorp to minimise transfer of rail freight impacts to the road network and construction traffic impacts on the road network.

- GrainCorp requests that any infrastructure approval contain conditions which mandate road condition surveys/reports to be undertaken.

- GrainCorp requests that the proponent prepare and make public a Level Crossing Report (LCR) for Project infrastructure, which must include:
    - the cumulative impacts of multiple level crossings on transit time throughout the region which may impact the route selection for road traffic, particularly Higher Mass Limits (HML) vehicles during peak harvest and intercity road freight.
    - the cumulative impacts on the wider rail Network.

- GrainCorp requests the EIS confirm that all public road rail crossings (level crossings and bridges) incorporate design allowance for passage a maximum agricultural vehicle dimensions.

- GrainCorp disputes the viability of the ballast and capping sourcing strategy and a Quarry Material Availability Assessment must be undertaken.

Flooding

- GrainCorp is concerned flood modelling does not accurately capture the complexity of flood hydraulics at the Narromine site and expects the proponent to provide assurance the flood model is 'fit for purpose' and can be relied upon.

- GrainCorp requests clarity regarding the use of input data to the flood model to ensure major flood levels are determined on best available understanding of the past ~100 years of climate data.

- GrainCorp expects flood flow predictions for the 1 in 100 year event inclusive of an allowance for climate change impacts, be compared to 1955 rainfall conditions to determine whether the flood model is correctly parameterised.

- GrainCorp expects clarity regarding the assessment of sub-daily rainfall storm events in terms of flooding of land adjacent to the rail alignment.

Noise

- GrainCorp requests noise impacts at its sites be assessed in consideration of all existing operational activities.

- GrainCorp expects early involvement in development of this Construction Noise and Vibration Management Plan, and that it will be completed to GrainCorp's satisfaction.

- GrainCorp expects to be consulted regarding the Narwonah site regarding its "in use" status.

- GrainCorp requests the EIS provide clarification as to whether activities at the Narwonah and Narromine sites are likely to be negatively impacted by operational noise, and that the receiver type definition applied to the sites must consider its obligations under its Occupational Health & Safety Management System.

Social and Economic

- GrainCorp requests a more robust assessment of the impact on local housing stock and the potential for a detrimental outcome for both GrainCorp employees and the communities in which they live.

- GrainCorp is concerned for its ability, and for that of local grain growers, to afford, attract and retain workers due to the creation of other (possibly higher-paid) employment opportunities.

- GrainCorp is supportive of any options to require the proponent to provide legacy infrastructure to be utilised by the wider community from improved public amenity and economic sustainability.

- GrainCorp also expects that the post-approval Workforce Management Plan will contain a specific ‘Emergency services’ section, developed with the early involvement of GrainCorp.

Biosecurity

- GrainCorp expects early involvement in development of the Biosecurity Management Plan, and that it will be completed to GrainCorp’s satisfaction.

# 1. Introduction

GrainCorp Limited (GrainCorp) supports the Inland Rail project, including the 306km Narromine to Narrabri (N2N) section (the Project), and understands the positive long-term benefits of improved rail connectivity for Australian grain producers and the wider agricultural sector.

Due to the significant scale of the Project, GrainCorp acknowledges there will be impacts to landholders, businesses and the community within the vicinity of the rail alignment. It is crucial the Environmental Impact Statement (EIS) identifies and assesses predicted impacts in a credible manner and provides for mitigation of unacceptable impacts.

The GrainCorp review of the Inland Rail N2N EIS relates to key areas affecting its grain storage and handling sites at Narwonah, Narromine, Curban, Gwabegar and Narrabri. Impacts to the wider grain growing districts surrounding the Project extent are also considered.

The review focuses on the quality of the impact assessment, identifies issues requiring the provision of additional information by the proponent, Australian Rail Track Corporation Limited (ARTC), and outlines areas of importance to GrainCorp where a role in future consultation is warranted.

# 2. Traffic and Transport Issues

## 2.1 Unclear approval process for increased train length and additional proposed connections

GrainCorp understands the current approval is being sought to operate trains of a maximum length of 1,800m, although the Project will be designed and built to accommodate future 3,600m trains that will require a separate approval process.

It is unclear what the approval process for 3,600m trains will be and whether small incremental changes will be permissible. Small incremental changes in train length and or frequency of rail movements could have significant impacts on trip times for road traffic especially during peak harvest times and both road and rail operations of GrainCorp sites along the alignment.

**GrainCorp requests** the EIS detail the approval process required to permit the commencement of 3,600m trains on Inland Rail and specify thresholds of incremental change *not* needing consent/approval.

GrainCorp also understands that several identified connections have been proposed but are not included for construction within this EIS. It is again unclear if further approval mechanisms are intended to be undertaken to allow these connections to be constructed or the duration and conditions for which any approval given is valid for.

## 2.2 Operational degradation of existing rail lines - poor connectivity with Inland Rail

GrainCorp operates over 30 Storage and Handling sites adjacent to the Inland Rail alignment. Every year these facilities and associated road and rail logistics account for the

movement of 5 millions of tonnes of regional produce that has markets both domestically and internationally.

The very nature of our busines and the seasonal variability of agricultural production within Australia requires an agile and effective supply chain, as was experienced during the recent drought on the east coast of Australia.

**GrainCorp is concerned** an operational degradation issue exists for the east-west movement of regional freight traffic and the need exists to facilitate access to existing and proposed intermodals, industrial areas and GrainCorp sites. In addition, GrainCorp believes the Project is missing an opportunity to create efficient rail logistic pathways to all existing and potential market destinations. Operational degradation of regional networks and reduced opportunity for regional traffic is an economic, safety and freight efficiency issue which will not be fully addressed by the proposed connections.

The environmental assessment requirements of the Secretary of the Department of Planning, Industry and Environment (the SEARs) section 8.2 states the "proponent must assess (and model) the operational transport impacts of the project, including"…"wider transport interactions (local and regional roads, cycling, public and freight transport and the broader NSW rail network)". The proposal connects with four existing rail lines that are part of the ARTC and Country Regional Network rail networks. The connections are described in *Chapter A7 Proposal features and operation Table A7.1*.

The EIS asserts in *Chapter B11 Traffic and Transport section 11.4.1* that "the proposal would not have any impacts to train paths when in operation. Connections with existing lines would be provided via new rail junctions providing greater opportunity for movement of freight by rail. All train movements on and between Inland Rail and existing lines would be managed in accordance with existing operational procedures". **GrainCorp disputes** this assertion and instead suggests that Inland Rail mainline priority and existing train priority matrix would mandate impacts to regional train scheduling and operations as outlined within Schedule F of the ARTC *Network Management Principles*.

**GrainCorp requests** the EIS demonstrate why the proposal has minimal connectivity to Inland Rail, particularly in high production agricultural areas where there is an opportunity for road freight movements to be shifted to rail. The provision of operationally efficient connections to existing regional lines will be of outstanding benefit to both existing and new markets domestically and for export. Specifically, the EIS must demonstrate, through an appropriate benefit cost analysis (BCA) and economic model, the operational cost of additional train kilometres travelled due to inefficient connections and potential impact to accessing existing and new markets.

The BCA should take into account forecast growth in regional train movements due to the implementation of the NSW Special Activation Precincts, and forecast grain markets as a result of demographic change and market access resulting directly from Inland Rail. The BCA should have reference to *Future Transport Strategy 2056* (TfNSW, 2018), *NSW Draft Freight and Ports Plan* (TfNSW, 2018), *A 20-Year Economic Vision for Regional NSW* (July 2018) and *Australia's Grain Outlook 2030* (GRDC, 2019).

GrainCorp is also willing to assist in the provision of information that may be required to provide accurate modelling and market access information.

## 2.3 Incomplete assessment of impacts to regional roads during construction and operation

**GrainCorp has concerns** with regard to the reliance on the successful contractor to negotiate the Construction Environmental Management Plan (CEMP) and its sub-plan the Traffic, Transport and Access Management Plan. The EIS fails to provide a complete assessment of the impact to the region's roads and any subsequent negative outcome for the transport of grain to GrainCorp facilities.

GrainCorp expects there should be no lasting impacts to the regional road network as a result of the Project. **GrainCorp requests** that a Rail Possession Strategy and Traffic, Transport and Access Management Plan be prepared in consultation with both Transport for NSW (TfNSW), local councils, GrainCorp and rail operators to minimise transfer of rail freight impacts to the road network and construction traffic impacts on the road network.

**GrainCorp requests** that any infrastructure approval contain conditions which mandate road condition surveys/reports to be undertaken in conjunction with the relevant road authority and any damage to roads resulting from the Project are to be rectified as soon as is practicable to allow for the safe and efficient movement of commodities throughout the region.

## 2.4 Failure to address importance of impacts caused by level crossings

The GrainCorp business is reliant on an efficient and effective road network to ensure the movement of agricultural produce is not hampered particularly during time critical periods such as harvest and at other times when the supply chain requires essential deliveries for food manufacture. We note the introduction of 51 additional level crossings, some in near proximity to GrainCorp facilities, have the potential to significantly impact the company's operations. GrainCorp also appreciates the scale of this project and the related safety implications of additional level crossings for the wider community.

**GrainCorp requests** that the proponent prepare and make public a Level Crossing Report (LCR) for the Project infrastructure, which must be developed in consultation with the relevant road authority. GrainCorp strongly supports a <u>minimum</u> of all State and Regional roads be grade separated. Within the affected project areas this includes:

- Oxley Highway
- Castlereagh Highway
- Baradine-Coonamble Road
- Baradine-Gwabegar Road
- Tomingley-Narromine Road
- Narromine-Eumungerie Rail Road

For <u>all</u> remaining proposed public level crossings GrainCorp does not support elimination as a control due to impacts on road movements, however the safety measures should include active warning devices to mitigate safety concerns.

Furthermore, GrainCorp is concerned about the cumulative unintended consequences of multiple level crossings across the wider Inland Rail program of works and operations. **GrainCorp requests** the LCR must also include the cumulative impacts of multiple level crossings on transit time throughout the region which may impact the route selection for road traffic, particularly Higher Mass Limits (HML) vehicles during peak harvest and intercity road freight. GrainCorp sites receive road-based deliveries from across the directly affected area

and have concerns the proposed level crossings will impact the efficient movement of grain, particularly during harvest, with the most affected quadrants being located at the western precincts of the alignment.

GrainCorp also notes that the construction of additional connections and the proposed operation of the Inland Rail and associated Network may have impacts that have not been assessed appropriately on existing level crossings such as;

- Dandaloo Road, Narromine
- Dandaloo Street, Narromine
- Newell Highway, Narrabri
- Old Turrawan Road, Narrabri

In particular the proposed West/South connection at Narromine will create a new level crossing across Dandaloo Road and pass within 50m of the existing entrance to the GrainCorp facilities at Narromine.

**GrainCorp requests** that any LCR include the cumulative impacts on the wider rail Network.

## 2.5 Provision in design for passage of agricultural machinery

**GrainCorp requests** the EIS confirm that all public road rail crossings (level crossings and bridges) incorporate design allowance for passage a maximum vehicle dimensions gazetted in National Class 1 Agricultural Vehicle and Combination Mass and Dimension Exemption Notice 2020 (No.1) for Zone 5.

## 2.6 Unrealistic Dubbo Regional LGA focused supply of ballast and capping material

**GrainCorp does not consider** the supply strategy of ballast and capping material presented in *Chapter A8 Construction of the proposal - section A8.10.2*, which is focused on the Dubbo Regional LGA, to be practical due to the excessive haulage route distances to the 306km entirety of the Project.

GrainCorp believes the sourcing of material across this distance would have severe impact on the availability of trucking resources for the movement of regional commodities having a significant impact on the economic viability of such activities for the agricultural sector during peak harvest and other periods of demand.

**GrainCorp disputes** the viability of the ballast and capping sourcing strategy and asserts the EIS has failed to adequately demonstrate local sources cannot be found of either existing or future construction material resources. The construction contractor must undertake a *Quarry Material Availability Assessment* to identify appropriate resource location within distances that do not place undue impact on existing enterprises. The less desirable option of sourcing of material from a Dubbo Regional LGA quarry must be justified on a transparent economic basis, and by also considering road damage and road traffic safety concerns.

# 3. Flooding Impacts

## 3.1 Uncertainty regarding flood impacts at Narromine site

The proposed future rail connection between the Parkes to Narromine Line and the Narromine to Cobar Line will pass adjacent to GrainCorp's Narromine site occupying land currently owned by GrainCorp. Change in peak flood level (afflux) for the 1% AEP flood event is mapped in *Technical Report 3 Flooding and hydrology assessment Part 6 of 12 Appendix G Figure 1.4a*. The Narromine site will be subject to a minimal increase in afflux of between 0-0.01 metres (less than one centimetre) for this event (it is noted that during the consultation process, the proponent provided separate advice to GrainCorp that the site would experience afflux of between 0.01-0.02 metres).

Change in peak flood level (afflux) for the 1% AEP flood event modified to consider climate change (22.8% increase in rainfall depth) is mapped in Technical Report 3 *Flooding and hydrology assessment Part 6 of 12 Appendix G Figure 1.5a*. Afflux increase remains within the same range of 0-0.01 metres for this modified event.

The alignment of the proposed future rail connection between the Parkes to Narromine Line and the Narromine to Cobar Line is mapped in *Part E Map book Part 5 of 5 Operation maps Map 209 of 209*. No surface water drainage culverts are identified within the alignment.

GrainCorp has accessed a digital elevation model of the Narromine region which has been made available by the Intergovernmental Committee on Surveying and Mapping (ICSM) (https://elevation.fsdf.org.au/#). The elevation data shows existing surface water drainage is primarily to the west towards a neighbouring cropping paddock. The proposed future rail connection will provide a physical barrier to that flow and no culverts appear to have been considered to manage under passage of surface water drainage.

The majority of GrainCorp's Narromine site will be entirely bounded by rail lines when the future rail connection is completed. This is a complex hydraulic scenario for:

- generation of flood waters (considering at anytime the bunkers may be full and impervious covers may increase the impervious surface fraction to an estimated 20% and rainfall to runoff conversion would increase accordingly)
- movement of flood waters constrained on all sides by the rail formation which effectively would act as a levee
- residence time of flood waters considering no culverts are planned within the section of the proposed future rail connection.

**GrainCorp is concerned** the large scale at which flood modelling has been undertaken for the EIS has not accurately captured the complexity of flood hydraulics at this location. This is highlighted by the lack of any afflux increase when 22.8% more rainfall is added to the model to account for future climate change predictions. **Graincorp expects** the proponent to provide assurance the flood model used in the EIS is 'fit for purpose' and can be relied upon to determine flood impacts at a location with such unusual hydraulic characteristics.

## 3.2 Potential rainfall data limitations for flood impact assessment

**GrainCorp requests** clarity regarding the use of input data to the flood model to ensure major flood levels are determined on best available understanding of the past ~100 years of climate data. The flood model uses the Narrabri rainfall dataset which commences in 1962 and Narromine rainfall dataset which commences in 1969. The wettest period in the past ~100 years occurred in 1955, which is outside the rainfall data period. It is also unclear how

much missing data each dataset includes and what influence this might have on flood modelling results.

### 3.3 Omission of flood risk assessment in response to La Niña climate conditions

**GrainCorp understands** that flood risk for the Project region is known to be significantly elevated during La Niña (drought risk is elevated during El Niño) yet this does not seem to have been considered in the flood risk assessment. Climate change risk assessment should consider the impacts of climate change on the worst case scenario (ie. the 1955 flood, which was a La Niña) but the rainfall record used in the climate change risk assessment does extend back to this period. An increase of 22.8% was applied to the 1% AEP (average exceedance probability) rainfall event to account for future climate change influences on rainfall, but the EIS makes no attempt to compare this 'modified' 1% AEP rain event (calculated using only post-1960 observed data) to the rain event associated with the 1955 flood. **GrainCorp expects** the EIS to assess flood flow associated with the 'modified' 1% AEP rain event against flood flow generated by 1955 rainfall conditions to determine whether the flood model is correctly parameterised to simulate the 1% AEP flood event.

### 3.4 Unclear usage of sub-daily rainfall to predict flooding

With the frequency of high intensity short period rainfall events expected to increase in the future due to climate change impacts, it is important to adequately assess potential for flooding resulting from sub-daily rainfall events. **GrainCorp expects** the EIS to provide clarity regarding the assessment of sub-daily rainfall storm events in terms of flooding of land adjacent to the rail alignment.

## 4. Noise Impacts

### 4.1 Consideration of GrainCorp sites as commercial/industrial

The EIS considers GrainCorp sites as commercial/industrial (non-residential) noise-sensitive land uses. GrainCorp facilities operate 24/7 and have amenities on all sites which allow staff to take fatigue brakes. The *Interim Construction Noise Guideline* (ICNG) applies to assessment of construction noise impact and the *Rail Infrastructure Noise Guideline* (RING) applies to operational noise impact. Neither guideline considers a receiver type definition suitable to the facilities which GrainCorp sites offer (ie. night-time sleep accommodation) to meet obligations under its Occupational Health & Safety Management System (OHSMS), which are compliant with recognised international safety standards. **GrainCorp requests** noise impacts at its sites be assessed in consideration of all existing operational activities.

### 4.2 Construction noise

ICNG sets noise management levels for construction activities. Industrial premises which are in use attract an external noise level of 75 dB $L_{Aeq(15min)}$.

The GrainCorp Narwonah site will be affected by a *new rail line development* and will experience airborne noise levels of 95-100 dB LAeq during construction as per *Part E Map book – Construction Phase Map 1 of 216*.

The GrainCorp Narromine site will be affected by *redevelopment of existing rail line* for the proposed future rail connection between the Parkes to Narromine Line and the Narromine to Cobar Line and will experience airborne noise levels of 75-80 dB LAeq during construction as per *Part E Map book – Construction Phase Map 209 of 216*.

GrainCorp understands the sites at Curban, Gwabegar and Narrabri are located at distance from the rail alignment will not be impacted by construction noise.

Construction noise levels at the Narwonah and Narromine sites exceed guideline levels (notwithstanding discussion in section 4.1). GrainCorp understands a Construction Noise and Vibration Management Plan would be prepared and implemented as part of the CEMP in accordance with the Inland Rail NSW Construction Noise and Vibration Management Framework. **GrainCorp expects** early involvement in development of this Plan, and that it will be completed to GrainCorp's satisfaction. **GrainCorp further expects** to be consulted regarding the Narwonah site regarding its "in use" status according to the guideline.

### 4.3 Operational noise

For non-residential noise-sensitive land uses, RING indicates that only $L_{Aeq}$ is applied, as the focus is on speech interference and providing adequate acoustic protection to conduct the activities associated with those land uses. However, RING does not specify airborne rail noise trigger levels for industrial land use affected by heavy rail developments.

**GrainCorp requests** the EIS provide clarification as to whether activities at the Narwonah and Narromine sites are likely to be negatively impacted by operational noise, and that the receiver type definition applied to the sites must consider its obligations under its OHSMS (discussed in section 4.1).

## 5. Social and Economic Issues

### 5.1 Impact on housing and accommodation

**GrainCorp notes** that the SEARs requires that the "proponent must consider the capacity for communities along or near the rail corridor to house construction workers in existing accommodation. Where temporary accommodation for construction workers (construction camps) is proposed, the Proponent must assess their social and economic impact on local communities".

GrainCorp is concerned that the assessment makes an erroneous assumption that there will be negligible impact on the local housing market by the expected 2,000 construction workers over 4 years, asserting that nearly all workers (typically males under 45 years) will be accommodated in Worker Accommodation Facilities.

**GrainCorp requests** a more robust assessment of the impact on local housing stock and the potential for a detrimental outcome for both GrainCorp employees and the communities in which they live.

### 5.2 Impact on availability of workers

The Project's demand for workers will put significant pressure on workforce availability during traditional rural peak employment periods, such as annual harvest. A negative

workforce availability outcome for the grain sector would lead to higher operating costs for many rural operators. **GrainCorp is concerned** for its ability, and for that of local grain growers, to afford, attract and retain workers due to the creation of other (possibly higher-paid) employment opportunities.

### 5.3 Infrastructure contributions ('legacy' items)

GrainCorp considers a project of this size to have a significant effect on the local community which is bearing the impact of the construction and disruption. **GrainCorp is supportive** of any options to require the proponent to provide legacy infrastructure to be utilised by the wider community from improved public amenity and economic sustainability.

### 5.4 Impacts on emergency services

GrainCorp notes that the Central West Regional Emergency Management Committee was consulted as part of the SA. However, **GrainCorp is disappointed** that more detailed consultation was not undertaken with individual emergency service providers in the Region – ie Fire & Rescue NSW, NSW Police, NSW Ambulance, SES and Rural Fire Service.

GrainCorp considers that local emergency services will experience real impact as a result of the construction activities and the influx of construction workers. GrainCorp also notes that there are no permanent fire stations many towns (e.g. Gilgandra); they are either retained NSW Fire and Rescue or volunteers with NSW Rural Fire Service.

**GrainCorp also expects** that the post-approval Workforce Management Plan will contain a specific 'Emergency services' section, developed with the early involvement of GrainCorp.

## 6. Biosecurity

The Biosecurity Act 2015 and Biosecurity Regulation 2017 provides NSW with the essential tools and powers to manage animal and plant pests and diseases, weeds and contaminants that threaten the NSW economy, environment and community. The proposed N2N rail alignment passes through significant agricultural areas that are key to the local, state and federal economies. On that basis, the project will need to be able to clearly demonstrate it has the measures to prevent pest and disease outbreaks along the alignment, and has the required plans and actions instigated to deal with any such incidents.

Weed control will be critical during the construction stage, and ongoing operations will require suitable stewardship and management of the rail corridor lands and adjoining lands in collaboration with any affected neighbours. GrainCorp understands a Biosecurity Management Plan addressing pest flora and fauna species and diseases must be prepared and implemented by the Proponent. **GrainCorp expects** early involvement in development of this Plan, and that it will be completed to GrainCorp's satisfaction. Public consultation, particularly with adjacent rail alignment landholders, will be critical to ensure the likelihood of detrimental incidents are minimised.