

Sunday, 7 February 2021

Narromine Shire Council

Response to Submission of Environmental Impact Statement
State Significant Infrastructure
Inland Rail- Narromine to Narrabri SSI-9487

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Submission Summary

Narromine Shire Council supports the proposed Inland Rail 306km Narromine to Narrabri (N2N) development (the Project) which traverses approximately 48km of the Narromine Shire Council Local Government Area (LGA).

The proponent, Australian Rail Track Corporation Limited (ARTC), has exhibited an Environmental Impact Statement (EIS) for the Project as required for Critical State Significant Infrastructure.

The Project is expected to have a major impact on Council and the wider local community during phases of construction and operation. Council has undertaken a review of the EIS to ascertain the severity of these impacts and to ensure the proponent has provided reasonable mitigation measures to the satisfaction of Council.

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 Council where a role in future consultation is warranted.

Social and Economic

- Council is very disappointed that the Economic Assessment (EA) and the Social Assessment (SA) fail to specifically assess the likely economic benefits or costs of the Project to the Narromine LGA.
- Council has serious reservations concerning the preparation and interpretation of the regional analysis, caused by the mismatch of scales between this assessed wider region 'study area' and those LGAs affected directly by the Project.
- Council contends that no meaningful interpretation of local (LGA based) economic or social costs and benefits of either the construction or operation phase of the Project can be obtained from data presented.
- Council requests further detail be provided in the EA and SA to assess the realistic economic, social and environmental costs and benefits that can be expected for the Narromine LGA.
- Council expects the SA and EA to answer:
 - o To what extent will 'local procurement' measures favour possibly larger businesses in Dubbo over smaller businesses in the Narromine LGA?
 - o What is the subsequent result on realistic economic benefit to the Narromine LGA, as opposed to the regional 'study area'?
 - o To what extent are potential construction workers likely to remain in, or move to Dubbo and commute daily to work, rather than stay in the temporary Narromine WAF or rent or buy in Narromine?
 - o Will construction companies be required to limit employees' or contractors' 'journey to work' time or distance?
- Council is alarmed that neither the SA or EA reference the *Narromine Shire Council Economic Development Strategy* or the *Industry Skills and Opportunities Action Plan: In focus Dubbo Regional, Narromine and Narromine Council Joint Focus Project*, as these documents contain specific actions relating to local economic opportunities, skills availability and training and should be explicitly referenced.

- Council expects that the use of the term 'local' will mean 'local' to the LGA, and not to the Project study area in its entirety. Council expects to have early involvement in the post-approval Workforce Management Plan to ensure that these local targets are properly informed, reasonable and achievable for both its community and for the efficient implementation of the Project.
- Council is concerned that the incoming workforce and its subsequent demand for local retail and local services will put significant pressure on the employment of 'key workers' currently employed in local aged care and disability services in Narromine.
- Council is disappointed the SA's treatment of local and indigenous businesses does not contain information relevant to each LGA. The information presented is generic to the region, and does not indicate the diversity of skills, experiences, contacts and issues relevant to each LGA. Council expects that much better detail relating to each LGA will be provided in the Workforce Management Plan, and that the Plan will contain a specific *Aboriginal Business Development Strategy*, with early input by the local aboriginal community and Council.
- Council is disappointed the indicative list of training providers in the SA does not contain any information about the Narromine LGA.
- Council dissatisfied with the social risk ratings given to a number of potential social and economic impacts of the Project, as the low ratings applied to many issues mean that they are no longer afforded detailed scrutiny in the SA. Council expects these ratings to be reviewed and justified in the EIS.
- Council expects that the SA should present estimates of both the proportion of likely non-resident workforce and of the proportion who may bring family members to the LGA. A simple 'sensitivity analysis' should be applied to this Project.
- Council is concerned that the assumptions about the future population size decline in the SA. This assumption filters through to other assumptions made in the SA, particularly regarding impact on the local housing market and health and community services. Data instead suggests a 1% future increase each year in population rather than a decline. Council expects this increase to be used in the assumptions in the SA and ongoing Management Plans.
- Council is disappointed that the SA has not included particular baseline social and economic data for each LGA. These data should be presented in the SA, and should then be used, referenced and monitored throughout the post-approval Plans that are foreshadowed for the Project.
- Council is surprised and dissatisfied at the weakness of mitigations proposed for socio-economic impacts at the LGA level, which is a consequence of the failure of the risk ratings given to a number of potential social and economic impacts of the Project.
- Council is concerned that the mitigations proposed for most social and economic issues (whether positive or negative) are 'deferred' to post approvals such as the Workforce Accommodation Plan, Workforce Management Plan etc. Council expected tangible mitigations to be presented in the EIS.
- Council is dissatisfied with the 'deferral' of many critical issues to post-approval processes. Council is concerned that its involvement in these Plans during their development and ultimate implementation may not be sufficiently robust to ensure

appropriate social and economic benefits are realised. Council is aware of the *NSW Government's Defining engagement terms: Post approval guidance for Infrastructure Projects* and requests that Council must be afforded an early and meaningful role in the preparation of all post-approval Plans that affect the LGA.

- Council notes the SA consultation activities and is disappointed and concerned that several key groups were not consulted as part of the SA.
- Council considers that the EIS is deficient in addressing the capacity for communities along or near the rail corridor to house construction workers. Council is particularly alarmed that the SA 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 of age) will be accommodated in WAFs.
- Council challenges the assumptions relating to housing choices and availability, and considers that a proportion of incoming construction workers will choose to move to their own house in each of the LGAs, even if temporarily.
- Council expects that the SA should clearly show housing availability, rental and sales costs baseline data for each town and LGA, and the extent to which these variables will affect sections of the community.
- Council is disappointed that there is no further detail in the SA regarding the likely number of additional smaller establishments and beds available. These data must be shown in order to make further assumptions about housing availability and impact on local accommodation.
- Council considers that the SA should much more rigorously assess the demand for, and impact on, tourism accommodation in each individual LGA.
- To offset the impact of the Narromine WAFs on the local community and the expected impacts on local housing and the economy, Council expects that a certain level of local infrastructure to be provided by the proponent to Council, including:
 - o construct some new permanent accommodation for the Project workforce in Narromine.
 - o infrastructure that should remain on the Narromine WAF site after decommissioning:
 - Sewerage system infrastructure
 - Water supply infrastructure
 - Electricity infrastructure
 - Drainage infrastructure
 - Telecommunications infrastructure including NBN and improved mobile service
 - Access and parking infrastructure
- Council expects a range of details regarding the planning, construction and operation of the WAF to be clarified before Project approval is given, as insufficient detail is provided in the EIS and therefore the likely impacts on the community cannot be properly assessed.
- Council expects the Workforce Accommodation Management Plan (WAMP) to be completed to Council's satisfaction.

- Council expects that the demand and likely impact on its own local recreational facilities be better assessed, particularly as Council is keen for incoming workers and their families to integrate with the community.
- Council is disappointed that more detailed consultation was not undertaken with individual emergency service providers in the LGA and Council expects much more rigour in assessing the impacts of the construction activities and incoming workforce on local emergency services.
- Council also expects that the post-approval Workforce Management Plan will contain a specific 'Emergency services' section, developed with the early involvement of Council, emergency services groups and must address staffing and resourcing levels in Narromine LGA given the forecast of up to 1,000 additional residents for a period of up to 48 months.
- Council considers the lack of consultation with Western NSW Local Health District (LHD) as a major flaw in the SA and Council expects much more rigour in assessing the impacts of the incoming workforce on local health providers and services.
- Council expects that the post-approval Workforce Management Plan will contain a specific 'Health Impact' section, developed with the early involvement of Council, Western NSW LHD and local primary and allied health providers.
- Council is disappointed by the lack of assessment in the EIS relating to cumulative impacts of numerous regional infrastructure projects on Narromine LGA.
- Council is surprised that none of the sections of the EIS appear to contain clear tabulated lists showing the number and/or size of properties affected by the proposal and requests that property assessment in the EIS demonstrate affectations within the Narromine LGA.
- Council requests that further consideration and information be provided about the cumulative impacts of rail crossings and their impacts on traffic be undertaken. Of particular concern is the potential for alternative traffic routes be used by heavy mass vehicles seeking to avoid level crossings and time delays caused by Inland rail.
- Council considers that some of the social and economic issues relating to remaining level crossings have not been adequately dealt with and Council requests that it be given an early opportunity to contribute to the post-approval Traffic, Transport and Access Management Plan, and that it be developed to the satisfaction of Council.
- Council is concerned that no assessment has been made of the logistics and difficulties of moving agricultural machinery across level crossings, and requests that further information be given in the EIS.
- Council is concerned that no analysis has been made of the additional travel time required for journeys resulting from road closures.

Traffic and Transport

- Council 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.

- Council 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 and industrial areas.
- Council 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.
- Council 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.
- Council expects there should be no lasting impacts to Council controlled and other classified roads as a result of the Project and Council requests that any infrastructure approval contain conditions of approval to include;
 - o A requirement for a road safety audit to be undertaken by a mutually approved independent consultant and to a mutually approved scope of works, especially for construction related works. A copy of this road safety report to be provided to the relevant road authorities (including Transport for NSW (TfNSW) and Council) for review and endorsement.
 - o A requirement for road condition surveys/reports to be undertaken by a mutually approved independent consultant and to a mutually approved scope of works. A copy of road condition reports to be provided to the relevant road authorities (including TfNSW and Council) for review and endorsement. Any damage to roads resulting from the Project to be rectified.
 - o Due to the nature of this project and significant unknown impacts on road use and subsequent road condition that could potentially arise during operations, a requirement for assessment and any resultant rectification to be ongoing for a period of up to 10 years post construction or 5 years post commencement of operations; whichever is the greater.
- Council does not consider the haulage route assessment in the EIS to be representative of a practical material supply strategy for construction of a project with an overall length of 306km, and Council is concerned the lack of acknowledgement regarding the likelihood of altered haulage routes of quarry material has resulted in an ineffective risk assessment process for transport and road impacts.
- Council requests that the proponent prepare and make public a *Level Crossing Report* for Project infrastructure, which must include:
 - o 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.
 - o the cumulative impacts on the wider rail Network.
- Council requests the EIS confirm that all public road rail crossings (level crossings and bridges) incorporate design allowance for passage of maximum agricultural vehicle dimensions.
- Council requests to have the proposed active level crossings at Narromine-Eumungerie Rail Road and Tomingley-Narromine Road upgraded to include grade separation. This is an issue of high importance as this route attracts a large external traffic volume to Council roads and is imposing a maintenance cost issue on Council.

- Council also requests the existing passive level crossing at Dandaloo Road at Narromine on the Parkes-Narromine Railway (~8km north of N2N southern commencement) will likely receive increased rail movements and Council is seeking to have this crossing upgraded to an active level crossing.
- Council requests the EIS disclose the extent of community consultation undertaken regarding the proposed closure of the eastern end of Dappo Road and provide reasoning for not making provision for a rail crossing at this location.
- Council requests the EIS commit to undertaking an assessment of impacts by heavy vehicle traffic to the road surface and assessment of impacts by all traffic to residents of Webbs Siding Road.
- Council expects that the design will consider sufficient allowance for vehicle stacking (especially heavy vehicles) and storage at level crossings on public and private roads, especially at intersections and driveways/crossovers.
- Council expresses its dissatisfaction with the lack of impact assessment in the EIS of consequences caused by traffic emanating from other N2N rail sections.
- Council requests the EIS confirm that all public road rail crossings (level crossings and bridges) incorporate design allowance for passage of maximum vehicle dimensions

Extractive Material Supply

- Council disputes the viability of the ballast and capping sourcing strategy and a Quarry Material Availability Assessment must be undertaken.
- Council requests the undertaking of a detailed sourcing study and associated *Traffic Impact Assessment* in conjunction with TfNSW, Council and existing/potential operators of extractive sites prior to project approval and any subsequent inclusion of additional extractive sites.
- Council does not consider the rigour of the borrow pit assessment to be appropriate for the scale of each development.

Council Road and Drainage Assets

- Council expects that each local Council road impacted by construction haulage is to be subject to a Road Dilapidation Report prior to use for construction.
- Council expects a detailed asset transfer register be compiled in an agreed format with clear definition of the asset owner following completion of the civil works required for the Project.
- Council expects all assets transferred to Council will be defect inspected, be CCTV inspected and details to be part of an asset handover package.
- Council expects that where the integrity of assets transferred to Council is compromised during a period of up to 10 years post construction and 5 years post operations commencing, that resultant rectification be the responsibility of the proponent. This expectation of rectification includes the upstream and downstream extents of erosion protection treatments of all new culverts and all existing culverts subject to increased inundation.

- Council expects all road pavement (structural and geometric) and drainage designs to be certified by a Road Designer (per TfNSW requirements). Other road infrastructure assets such as traffic control devices, barriers and signs to be certified by a suitably qualified engineer and approved by a Road Safety Auditor, and provided to Council for concurrence prior to construction.
- Council expects certified detailed as-built mark-ups and electronic as-built models are to be provided to Council in an agreed format.
- Council expects independent construction certification/verification needs to be undertaken on all Council owned assets or Council be advised and be provided the opportunity to attend critical hold points and inspections per the ARTC and TfNSW specifications.
- Council expects all materials used in the works on Council assets (apart from general fill and pavements) are to be new products unless otherwise agreed with Council.
- Council expects that sites will be left restored, culverts and assets cleaned and rubbish removed after completion of works at Practical Completion.
- Council expects the road interface with ARTC to commence at the location where road realignments have been imposed on the local road network.

Agricultural and Land Use

- Council has serious reservations concerning the preparation and interpretation the impacts to agricultural land on a 'regional' basis and requests the EIS assess the impacts on agriculture using an 'impact corridor' which would more accurately reflect the local nature of impacts on agriculture.
- Council requests the EIS identify the number of landholders affected by property severance in the Narromine LGA to enabling understanding of the true local impact.

Water and Flooding

- Council requests more transparency be provided regarding the construction water demand estimate of 4,635 mega litres and the parameterisation of the water budget.
- Council expects stormwater management during both construction and operation to consider the conveyance capacity of Council's existing stormwater system assets where discharges are proposed and that upgrades to any Council assets would be the responsibility of the proponent.
- Council 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.
- Council 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 models are correctly parameterised.
- Council expects clarity regarding the assessment of sub-daily rainfall storm events in terms of flooding of land adjacent to the rail alignment.

- Council expects more detailed flood assessment to be undertaken during detailed design to ensure flooding where the new rail line joins the old Narromine-Parkes rail line, including the area near Narwonah Siding, is well understood and managed accordingly.
- Council expects further detailed discussion and consideration of the future development of a town levee bank at Narromine aimed at protecting the township from flooding. Flood modelling at the detailed design stage must be undertaken in consideration of advice from Department of Planning, Industry and Environment.

Cultural Heritage

- Council requests assurance the Proposal site within Narromine LGA has been effectively surveyed for Aboriginal heritage and that all appropriate Narromine LGA Aboriginal groups were consulted with.

Biodiversity

- Council supports the Biodiversity Stewardship site process and expects offsets to be assigned in a preferential order, firstly within 20km, then 50km and thereafter 100km.
- Council requests the State Government undertake a holistic assessment of the Inland Rail Project and its impact on local communities from the point of view of market distortion of biodiversity offsets, and on the ability of future proponents to secure suitable offset credits for development of projects much needed by the regional economy.
- Council expects early involvement in the Biosecurity Management Plan and that it will be completed to Council's satisfaction. Public consultation, particularly with adjacent landholders, will be critical to ensure the likelihood of detrimental incidents are minimised.

1. Introduction

Narromine Shire Council welcomes the opportunity to comment on the Environmental Impact Statement for the construction of rail from Narromine to Narrabri.

Narromine Shire Council has been working with the proponent, Australian Rail Track Corporation Limited (ARTC), for an extended period including during the planning and delivery phase of the Parkes to Narromine section of the rail line.

Overall Narromine Shire Council is supportive of the increased connectivity and transport options that Inland Rail will deliver and this is reflected in our strategic documents including the *Narromine Shire Council Community Strategic Plan 2027*, the *Local Strategic Planning Statement 2020* and the *Narromine Economic Development Strategy 2018-2021*.

However, there will be costs to our community and issues with construction and operations that need to be considered. Our response to the EIS highlights the need for further consideration, planning and consultation to ensure costs are minimised and benefits to the community can be shown.

Our response to the EIS is detailed below and outlines the need for further work. Issues of highest concern include:

- Lack of grade separation planned for the Eumungerie–Narromine Rail Road and Tomingley–Narromine Road
- Lack of detail regarding traffic management and haulage and construction routes
- Specific social, economic and environmental costs and benefits have not been outlined for the Narromine Shire Council Local Government Area (LGA)
- Lack of adequate information pertaining to flooding and resulting change in depth, and duration of inundation; and
- Impacts on agricultural land are not adequately detailed.

2. Social and Economic Issues

2.1 Economic impact: differentiating between local, regional, State and national benefits and costs

Council is fully aware and appreciative of the expected economic benefits to the nation, to NSW and to the region of both the construction and operation of the N2N Project, and of the entire completed Melbourne to Brisbane Inland Rail Project. These benefits include the impacts of shifting freight from road to rail, major supply chain efficiency increases, opportunities for agricultural products to access markets, decrease in road crashes and subsequent community costs, and road decongestion and subsequent benefits. *Technical Report 14 Economic Assessment* (the 'EA') assesses such benefits of these three levels of geographies in some detail.

However, **Council is very disappointed** that the EA and *Technical Report 13 Social Assessment* (SA) fail to specifically assess the likely economic benefits or costs of the Project to the Narromine LGA.

Council expects positive economic benefits from the Project to flow to the LGA, and has been working for some time to maximise those benefits. This work is outlined in the

Narrromine Shire Economic Development Strategy 2018 – 2021. Council has also been cooperating with other regional councils in collectively striving for maximum economic benefit to the region (see section 2.1.1 for issues relating to local procurement and section 2.1.3 for issues relating to employment workforce & training).

However, Council knows that there will be economic and social costs of the Project to its relatively small LGA, even if benefits accrue to the wider and much larger region, state and nation.

The EA and SA combine the 'Far West & Orana' and 'New England & North West' regions (the study area's two relevant Australian Bureau of Statistics 'Statistical Area 4' (SA4) and labour market regions) to form the 'regional study area' for all employment and economic data analyses, particularly for the regional economic impact analysis (EA p65).

Council has serious reservations concerning the preparation and interpretation of this regional analysis, caused by the mismatch of scales between this combined region and the 6 individually affected LGAs, as explained below.

- The 'Far West and Orana' SA4 is 339,364 square kilometres (42% of the land area of NSW) and covers 13 LGAs extending from central NSW to both the Queensland and South Australian borders.
- The 'New England and North West' SA4 is 99,146 square kilometres (12% of the land area of NSW) and covers 12 LGAs extending from north of the Hunter Valley to the Queensland border.
- Combined, these 2 regions cover 54% of the area of NSW and 25 local government areas, only 6 of which are assessed (for other topics) in the SA. The combined region also covers many small LGAs which are unlikely to experience any positive economic impacts of the Project.
- Narrromine is at the eastern edge of this combined region, approximately 800km from the western edge of the combined region.

Council contends that no meaningful interpretation of *local* (LGA based) economic or social costs and benefits of either the construction or operation phase of the Project can be obtained from data presented for such a large region. Only by examining local (LGA based) effects will the true long-term benefits and costs of the Project (and completed Inland Rail Project) be able to be understood for each LGA.

Council requests further detail be provided in the EA and SA to assess the *realistic* economic, social and environmental costs and benefits that can be expected for the Narrromine LGA. Such detail should include, but not be limited to, the following likely economic impact benefits and costs for *each LGA*:

1. Benefit of the use of a local (ie LGA based) workforce during construction (both direct and indirect benefits)
2. Benefit of the use of a local (LGA based) workforce during operation
3. Benefit of the procurement of local (LGA based) goods and services during construction (both direct and indirect benefits)
4. Benefit of the use of local (LGA based) goods and services during operation
5. Benefit of local (LGA based) produce and goods being able to access Inland Rail network and additional markets
6. Benefit of the operation of the Workforce Accommodation Facilities to the local (LGA based) economy
7. Cost of the loss of local (LGA based) agricultural production

8. Cost of the reduced efficiency of local (LGA based) agricultural production
9. Cost of social disruption during construction
10. Cost of the loss of tourism or hospitality due to increased long term occupancy rates of accommodation
11. Benefit of local (LGA based) transport efficiencies during operation
12. Cost of local and interstate transport disruption during construction
13. Cost of local and interstate transport disruption during operation
14. Cost of housing unavailability / unaffordability to the local (LGA based) community
15. Benefit of increase in rental or sales earnings for local (LGA based) housing owners
16. Local (LGA based) environmental costs
17. Benefit and cost of the cumulative impacts of other concurrent infrastructure projects affecting the LGA

Appropriate assumptions and scenarios, reflective of local characteristics, should be agreed to for many of these issues. One example is the use of realistic population projections, as discussed in section 2.3.2. Council can also offer local data for use in these analyses.

2.1.1 Local benefits as opposed to benefits to Dubbo

Many parts of the SA and EA generically assess and quantify positive impacts expected at the 'regional' level – for example effects on housing, procurement of goods and local employment. However, Council is concerned that the extent to which Dubbo (as the major regional centre closest to the study area) will influence positive economic activity at the expense of the Narromine LGA has not been clearly articulated by the SA or EA. It is important to Council that as one of the small LGAs bearing the most impacts of the proposal, that its community should receive as much of the economic benefit of the Project as possible, particularly in the use of local suppliers and services, and in capturing spending by the construction workforce.

Dubbo offers a larger pool of potential construction workforce within the allowable one hour's driving distance to most construction sites along the Rail corridor. Because of its size, it also offers a wider and possibly more attractive range of services and facilities to the potential non-resident workforce than Narromine can (as recognised in the SA at p111). These realities affect many assumptions and assessments in the SA and EA. **Council expects** the SA and EA to answer the following:

- To what extent will 'local procurement' measures favour possibly larger businesses in Dubbo over smaller businesses in the Narromine LGA? What is the subsequent result on realistic economic benefit to the Narromine LGA, as opposed to the 'study area'?
- To what extent are potential construction workers likely to remain in, or move to Dubbo and commute daily to work, rather than stay in the Narromine WAFs or rent or buy in Narromine?
- Will construction companies be required to limit employees' or contractors' 'journey to work' time or distance? This is briefly mentioned as 'one hour' in the SA at p116 but is not mandated in the EIS mitigations. This has become an issue in the Hunter Valley, where the fatigue of mine workers after long shifts attempting to commute long distances has resulted in many traffic accidents, some fatal. This has affected the community to such an extent that some companies now have a 'maximum commute drive' rule in place for employees and contractors. This should be in place for the Project to protect workers and the community on the long journeys between towns in the region. This will then encourage workers to live in local housing or the WAFs in Narromine rather than in Dubbo.

2.1.2 Planning for economic development

Council is alarmed that neither the SA or EA referenced the following key documents relating to economic development:

- *Narromine Shire Council Economic Development Strategy (EDS) 2018 – 2021*. Prepared by Business Sense for Narromine Shire Council, 2018
- *Industry Skills and Opportunities Action Plan: Infocus Dubbo Regional, Narromine and Gilgandra Council Joint Focus Project*. Western Research Institute (2018)

These documents contain specific actions relating to local economic opportunities, skills availability and training and should be explicitly referenced in the SA and EA. The details within the plans must also form the basis for the local details regarding local product and service procurement that will be included in the post-approval Workforce Management Plan. Council expects early involvement in this Plan, and that it will be completed to Council's satisfaction.

A comprehensive list of work and facilitation that Council has achieved over the past two years as a result of the direction set by its *Economic Development Strategy* is provided in Appendix A.

2.1.3 Employment, workforce and training

Council is keen to maximise the economic opportunities of the Project for its local population – both for the current workforce and those currently not participating in the workforce. Council notes the SA sections *6.4 Employment, workforce and training*, *7 Social impact assessment – construction* and *7.2 Employment, workforce and training*.

Council particularly notes at SA p112: “A variety of skills would be required during construction including labourers, tradespeople, machinery operators, engineers, surveyors and site supervisors. ARTC is committed to creating opportunities for the development of skilled local workers through Inland Rail, by using local workers wherever possible... ARTC would require its contractors to have regard to the NSW Government Infrastructure Skills Legacy Program (Department of Industry, 2017) and negotiate suitable targets for employment and workforce development. The agreed targets for local, Indigenous, young, and female workers would be based on proposal requirements and socio-economic profiles of the local area.”

Council expects that the use of the term ‘local’ will mean ‘local’ to the LGA, and not to the Project study area in its entirety. Council expects to have early involvement in the post-approval Workforce Management Plan to ensure that these local targets are properly informed, reasonable and achievable for both its community and for the efficient implementation of the Project.

Council also appreciates the SA statement “while employment opportunities would be relatively short term during construction, training opportunities have the potential to lead to longer term benefits for workers who gain employment on the proposal” (p113). As shown in Appendix A, Council has already been active in facilitating its local workforce to upskill to be Project-ready, and is ready to work with the proponent to ensure this continues.

Council is **disappointed** that the SA section 6.3.1 *Local and Indigenous businesses* does not contain information relevant to each LGA. The information presented is generic to the region, and does not indicate the diversity of skills, experiences, contacts and issues relevant to each LGA. Council expects that much better detail relating to each LGA will be provided in the Workforce Management Plan.

2.2 Failure of risk assessment to capture severity of socio-economic impacts

Council is surprised and totally dissatisfied with the social risk ratings given to a number of potential social and economic impacts of the Project, as shown in the *Technical Report 13 - Social Assessment Table 7.1 Social impact summary table – construction*. The low ratings applied to many issues mean that they are no longer afforded detailed scrutiny in the SA, which Council is disappointed with, and which are addressed in detail in other sections of this submission (eg sections 2.7 and 2.9).

The table below shows the SA's risk benefit /ratings given to key social and economic impacts (in the SA *Table 7.1 Social impact summary table – construction*), and shows the ratings **that Council would expect** for these issues (using *Figure 6: Social risk matrix* from the NSW Government's *Social Impact Assessment Guideline for State Significant mining, petroleum production and extractive industry development, September 2017*).

Potential construction phase impact	Likelihood	Consequence	Risk benefit / rating
Housing and accommodation: demand on local tourist accommodation	EIS = Unlikely Council = Likely	EIS = Minimal Council = Minor	EIS = Low Council = High
Housing and accommodation: impact on local housing market	EIS = Unlikely Council = Likely	EIS = Minimal Council = Moderate	EIS = Low Council = High
Access and connectivity: delays and disruptions to local road users	EIS = Possible Council = Possible	EIS = Minimal Council = Minor	EIS = Low Council = Moderate
Access and connectivity: road safety risks	EIS = Unlikely Council = Possible	EIS = Minimal Council = Minor	EIS = Low Council = Moderate
Access and connectivity: safety/delays/disruptions to school bus routes	EIS = Unlikely Council = Possible	EIS = Minimal Council = Minor	EIS = Low Council = Moderate
Impacts on social infrastructure: Potential for non-resident construction workforce to access community services and recreational facilities [including medical and health]	EIS = Possible Council = Likely	EIS = Minor Council = Minor to moderate	EIS = Moderate Council = High
Impacts on social infrastructure: impact on emergency service response time	EIS = Possible Council = Likely	EIS = Minor Council = Minor to moderate	EIS = Moderate Council = High

Council expects these ratings to be reviewed and justified in the EIS.

2.3 Presentation and use of socio economic data and assumptions

Council is concerned about the source and use of some social and economic data and assumptions used in the SA and EA, as outlined in sections 2.3.1 to 2.3.3 below.

2.3.1 Estimate of non-resident workforce and families accompanying workers

The SA gives an estimate of the peak number of construction workforce expected for the Project (2,000 people) but makes no attempt to estimate the likely numbers of resident ('local') and non-resident workforce expected in each LGA, or estimate the proportion of the workforce who may bring family members with them to reside in the LGA. The SA section 7.4 states that "is not possible at this stage to estimate the proportion of local and non-resident workforce. ARTC and the primary contractor would undertake an analysis of the likely availability of construction workforce from the region prior to construction".

However, **Council expects** that the SA should present estimates of both the proportion of likely non-resident workforce and of the proportion who may bring family members to the LGA. A simple 'sensitivity analysis' could easily be applied to this Project, where various scenarios of the proportions of these populations can be presented. These scenarios should then be applied to the SA analysis of the following:

- demand on housing and accommodation (as discussed at section 2.7)
- employment of the local workforce (as discussed at section 2.1.3)
- likely effects on local services eg health, schools etc (as discussed at section 2.9).

2.3.2 Use of population projections

Council is concerned that the SA Table 6.5 *Narromine LGA – key population and demographic characteristics, 2016* shows a population decline by the year 2041 for the Narromine LGA. Because there is now a very positive indication of growth in the construction, agricultural and mining sectors in the LGA (including the Inland Rail Project), Council expects to see a reverse in the decline of population in future Census data. As a result, Council plans for a 1% increase each year in population rather than a decline.

Council expects this figure to be used in the assumptions in the SA and ongoing Management Plans.

Council can see that the current SA assumption regarding population decline filters through to other assumptions made in the SA, particularly regarding impact on the local housing market and health and community services. Council expects that its more realistic view of population size should be used instead, which in turn will give a more realistic view on the impacts on housing and local services that Council expects will be experienced as a result of the Project.

2.3.3 Provision of baseline social and economic data

Council is disappointed that the SA has not included particular baseline social and economic data for each LGA. This data should be presented in the SA, and should then be used, referenced and monitored throughout the post-approval Plans that are foreshadowed for the Project (for example the Workforce Management Plan).

For example, the data specified in the list at Appendix B should be provided in both the SA and future relevant Management Plans. This is the level of data that is required by the NSW Government's *Social Impact Assessment Guideline for State Significant mining, petroleum production and extractive industry development September 2017*, which the SEARS reference for socio-economic issues.

2.4 Realistic socio-economic mitigations

Council is surprised and dissatisfied at the weakness of mitigations proposed for socio-economic impacts at the LGA level, as shown in the SA *Table 10.2 Assessment of residual social risks—construction* and *Table 10.3 Assessment of residual social risks – operation*.

Council is concerned that the mitigations proposed for most social and economic issues (whether positive or negative) are ‘deferred’ to post approvals such as the Workforce Accommodation Plan, Workforce Management Plan etc. **Council expected** tangible mitigations to be presented in the EIS, particularly for housing & accommodation, employment, skills & training issues, and has specific suggestions as outlined in other sections of this submission (eg sections 2.7 and 2.9).

A summary list is provided as follows:

- Offer to workers of a range of accommodation options
- To ensure that workers are welcomed to the facilities in Narromine
- Ensure partners are welcomed to local area
- Schools training programs
- Traineeships
- Specific training options for long term unemployed
- Local procurement opportunities

As discussed in more detail in section 2.1.1, Council perceives an enormous gap between the costs of the Project that the LGA will be forced to bear, being justified against the vast economic benefits and tangible savings that will accrue to the state and nation. Council considers it extremely unfair, and expects its community to be compensated fairly and transparently for this burden.

2.5 Over-reliance on post-approval Management Plans

To achieve social and economic benefits from the Project, Council is currently reliant on the detail in the final EIS *Compilation of mitigation measures* and the detail that will follow in the range of proposed post-approval Management Plans (such as those relating to Workforce Accommodation, Workforce Management, Traffic and Transport etc).

Council is totally dissatisfied with the ‘deferment’ of these critical issues to post-approval processes. Council is also concerned that its involvement in these Plans during their development and ultimate implementation may not be sufficiently robust to ensure appropriate social and economic benefits are realised.

Council is aware of the NSW Government’s *Defining engagement terms: Post approval guidance for Infrastructure Projects, April 2020* and **requests** that Council be given an early and meaningful role in the preparation of all post-approval Plans that affect the LGA, particularly for the:

- Temporary Workforce Accommodation Plan (WAP)
- Workforce Management Plan
- Traffic, Transport and Access Management Plan (particularly for haulage of quarry product)

Council considers that the *Guidance’s* stipulation of Council involvement near the end of the Plan development process, with only 10 business days to comment, is **unsatisfactory**. The proponent and Department should be mindful of the relatively small size of Council staff resources, and ensure that Council staff are afforded adequate time and assistance to

meaningfully respond to each step of the preparation of each Management Plan. In return, **Council is mindful** of the proponent's wish to deliver the Project in a timely manner.

2.6 Appropriateness of SA consultation

Council notes the SA section 5.2 *Social Assessment consultation activities* and is **disappointed** and **concerned** that several key groups were not consulted as part of the SA.

Council expects that the following will be specifically consulted in relation to the likely increased demand on their services as a result of the construction of the Project:

- Western NSW Local Health District <https://wnswlhd.health.nsw.gov.au/> particularly regarding the Public Hospital at Narromine <https://www.health.nsw.gov.au/lhd/Pages/wnswlhd.aspx>
- Primary health care and allied health providers in Narromine
- Allied health providers in Narromine
- NSW Police
- NSW Ambulance
- Rural Fire Service
- Fire and Rescue NSW
- State Emergency Service

Further details are given in section 2.9.

2.7 Impact on housing and accommodation

2.7.1 Summary of Council's position

Council 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".

Council considers that the EIS is deficient in addressing the requirement of the first sentence. Council is particularly alarmed that the SA 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 WAFs.

Despite this deficiency, Council is still supportive of the development of the Narromine North and South WAFs (as discussed in section 2.8).

Council also wants incoming workers to feel comfortable to bring their families to town and to bring economic prosperity and business with them.

This issue is addressed in sections 2.7.2 and 2.7.3 below.

2.7.2 Impact on local housing availability and affordability

The SA section 6.6 *Housing and accommodation* provides a relatively generic regional analysis of housing and accommodation across the study area. It finds that:

- "housing in the study area is generally affordable and in some cases very affordable for most cohorts. However, all areas are unaffordable for pensioner couples and single part time worker parents on benefits" (p103) and that "housing affordability is

a particular issue for low income cohorts in ... Narromine... where housing is unaffordable for more cohorts than other areas” (p103)

- “There is potential for some non-resident workers to choose to rent homes in the study area rather than stay in the temporary workforce accommodation, and this is most likely to occur in host towns. This demand is likely to be small and subject to availability of rental accommodation at a reasonable price. There are varying levels of availability of rental properties and varying housing vacancy rates across the host towns, and housing is generally affordable across the local and regional study area. It is unlikely that such minor demand for rental accommodation would increase the price of rental properties in these locations” (SA Table 10.2).

Council challenges the assumptions made in the EIS relating to housing choices and availability, and considers that a proportion of incoming construction workers will choose to move to their own house in each of the LGAs, even if temporarily. It is also likely that professionals and managers will choose not to live in a WAF for extended periods of time, and may choose to live in local housing to be close to their construction site, rather than travel daily to a nearby larger town. The extent to which this is likely to occur specifically in Narromine and Trangie, in both rentals and purchases, **must** be assessed in the SA and EIS. (See section 2.3.1 which requests that the EIS present ‘scenarios’ of the proportions of resident versus non-resident workers and assumptions about the number of families accompanying workers).

House rental and sale prices and availability in Narromine will therefore likely be significantly impacted over the 4 years of construction, and may have already been affected by the proposal. This will have subsequent impacts on affordability and availability for the local community seeking housing. At the other end of the impact scale, it will also present opportunities for housing investment (and therefore economic benefit) to both locals and non-locals. Council considers that localised housing impacts will be even more pronounced than if the Project were closer to a larger urban area, since each small town in the study area (like Narromine) only has a relatively low stock of total and currently available housing.

Council also notes that the end of the drought and COVID during 2020 has changed the local housing market, and there is now a shortage of new houses being constructed, and a squeeze in the rental market.

Council is disappointed that, because ‘Housing and Accommodation’ was given an initial risk rating of ‘low’ in the SA (see section 2.2), that there was no further detailed analysis in the SA of the impact on housing on each LGA.

Council expects that the SA should clearly show housing availability, rental and sales costs baseline data for each town and LGA, and the extent to which these variables will affect sections of the community. For example, the following easily obtainable data should be referenced for Narromine:

- quarterly ‘*Rental and Sales Reports*’ data produced by the NSW Government
- property sales and rental data available from commercial sources
- 2016 Census housing rents and mortgages (including medians), household income and household types
- Anecdotal interviews with local real estate agents and housing providers

This data, in conjunction with the workforce scenarios requested above, must then form the basis for:

- a **realistic analysis** of the impact of the incoming workforce on the current and future housing market and particular community groups in Narromine

- the development and subsequent implementation of a specific 'Housing and Accommodation' section of the Workforce Management Plan (discussed at section 2.3.2).

2.7.3 Local tourism accommodation

The SA section 6.6.2 *Accommodation* (p103) shows the number of tourism establishments, rooms and beds for each LGA at June 2016 and acknowledges that it is likely to be an underestimate (since only establishments of 15 rooms or more are included in the data). The SA further states (p116) that although "it is expected the majority of the non-resident workforce would stay in the temporary workforce accommodation facilities... the proposal may increase some demand for local tourist accommodation facilities during the design and construction phase as ARTC and specialist workers access the proposal site for short periods of time." The SA section *Social Impact – construction – Industry and business* (p130) further asserts that "while there may be some demand on tourist accommodation facilities during construction, it is unlikely to restrict usual demand in the region."

Council is disappointed that there is no further detail in the SA regarding the likely number of additional smaller establishments and beds available. This data must be shown in order to make further assumptions about housing availability and impact on local accommodation.

Council calculates that there are currently approximately 240 beds available in Narromine and Trangie, and understands that there are approximately 2,000 in Dubbo, showing the vast differences in the concentration of supply at the regional level.

Council considers that the SA should much more rigorously assess the demand for, and impact on, tourism accommodation in each individual LGA, rather than making a generic regional statement. Effects will be localised as construction is carried out in each local area, particularly if workers are restricted to working within an hour's drive of their residence.

Similar to the 'local housing' issue raised above; the SA must include:

- a realistic analysis of the impact of the incoming workforce on local tourism accommodation in Narromine
- the development and subsequent implementation of a specific 'Housing and Accommodation' section of the Workforce Management Plan.

2.7.4 Infrastructure contributions ('legacy' items)

To offset the impact of the Narromine WAFs on the local community and the expected impacts on local housing and the economy, Council expects the proponent to provide a certain level of local infrastructure to Council.

Council considers that a small portion of the incoming workforce (particularly those in management or professional positions) will be likely to prefer renting locally for the duration of their employment, rather than stay in the WAFs, especially if they want to share with other professionals, or bring their family.

Council requests that the proponent construct some new permanent accommodation for the Project workforce in Narromine. These structures could be used by Project management and professional staff (and their families if required) and then left to the community as a Project legacy to help permanently ease the lack of rental accommodation in Narromine. Council proposes that a *local housing study* be undertaken to support this legacy approach. Council is also willing to discuss a range of accommodation types, and is not necessarily bound to large separate dwellings.

Council also expects that these items are included and negotiated with Council in a specific Infrastructure Contribution Management Plan or other relevant post-approval Plans as expected in section 2.5.

Please note that this list is in addition to infrastructure that Council expects the proponent to leave on the WAF site(s) after the WAFs have been decommissioned (see section 2.8.2).

2.8 Workforce accommodation facility

Council is comfortable with the location of the Narromine South WAF identified in the EIS, and mindful that the Narromine North WAF may not be used for the Project. Council sees that the WAFs will help to reduce the number of workers who may otherwise 'drive in drive out' of the LGA daily. Even though both WAFs are proposed to be located a short distance from town, Council would like the WAF residents to be as connected to town as possible, for example to use the Narromine Aquatic Centre, the two local gyms and to purchase goods and services in town, as well as participate in the community.

Council supports the provision of the WAFs in the Narromine LGA to:

- minimise the number of workforce who would otherwise choose to drive in / drive out daily
- lessen the impact on the local housing market
- provide a significant opportunity for local employment, use of local goods and services

However, **Council is disappointed** that the level of information for the sites provided in *Chapter C2 Assessment of temporary workforce accommodation* is minimal – it is significantly less than would be expected by Council for a similar Development Application of that capital value and expected community impact. As such, **Council seeks a commitment** to:

- clarification of a number of issues
- certain facilities being included in the proposed WAFs
- particular infrastructure to remain on-site after the WAFs close
- certain issues being included in the proposed post-approval Workforce Accommodation Management Plan (WAMP) that must be to the satisfaction of Council before construction of the facilities begins.

These are addressed separately below.

Council expects a range of details regarding the planning, construction and operation of the WAFs to be clarified before Project approval is given, as shown at Appendix C. These details are not provided in the current EIS and therefore the likely impacts on the community cannot be properly assessed.

2.8.1 Workforce Accommodation Management Plan (WAMP)

Council notes the requirement for a post-approval Workforce Accommodation Management Plan (WAMP) to be prepared by the proponent which will underpin the detailed planning, construction, operation and decommissioning of the WAF.

Council expects the WAMP to be completed to Council's satisfaction, and requests early involvement in the development of the Plan (as outlined in section 2.5). It further expects that the issues listed at Appendix D (without limiting the full list of issues to be included) will form part of the WAMP.

2.8.2 Infrastructure to remain on-site after WAFs closure

To offset the impact of the WAFs on the local community, **Council expects** that a level of infrastructure is to remain on site after the WAFs are decommissioned at the end of the Project. These items are listed in the table below. It is also expected that these items are included in the WAMP as detailed at section 2.8.1.

Infrastructure that should remain on the Narromine WAF sites after decommissioning
<ul style="list-style-type: none">- Sewerage system infrastructure- Water supply infrastructure including the booster to the town supply- Electricity infrastructure- Drainage infrastructure- Telecommunications infrastructure including NBN and improved mobile service- Access and parking infrastructure

2.9 Impacts on social infrastructure

Council needs to ensure that the Project's likely impacts on its local social infrastructure are minimised and mitigated. Council particularly notes the SA sections *7 Social impact assessment – construction 7.7 Impacts on social infrastructure* and *7.7.2 Impacts due to amenity and access changes: Facilities close to temporary workforce accommodation facilities*.

The key issues of concern to Council are the likely impacts on local emergency services and local health services, and these are dealt with separately below.

Council also notes the SA statement at p128 "It is expected that most local services and facilities, such as recreational facilities, would have capacity to meet increased demand". However, **Council expects** that the demand and likely impact on its own local recreational facilities be better assessed, particularly as Council is keen for incoming workers and their families to integrate with the community. For example, there may need to be:

- protocols in place to welcome incoming workers to temporarily join local sporting teams and/or to use local facilities outside key times when children are using them.
- the impact on all local outdoor recreation, as well as the local gymnasiums also needs to be considered more closely

2.9.1 Impacts on emergency services

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

Council considers that local emergency services will experience real impact as a result of the construction activities and the influx of construction workers. Potential impacts need to be properly understood and resourced. As an example, some emergency services operate on a regional basis across the LGAs, and in some cases the response time to an incident may be considerable (even hours) if services are already engaged in another incident a long distance away.

Council expects much more rigour in assessing the impacts of the construction activities and incoming workforce on local emergency services and expects to see, to the satisfaction of Council:

- Accurate descriptions of all services, and their current level of service or response times
- Realistic assessment of impacts on emergency services as a result of the Project
- Specific mitigations regarding this issue

Council also expects that the post-approval Workforce Management Plan will contain a specific 'Emergency services' section, developed with the early involvement of Council, as discussed at section 2.5. It must be developed to the satisfaction of these groups.

2.9.2 Impacts on health services

A major flaw in the SA is that Western NSW Local Health District was not consulted as part of the SA. Council therefore has no faith in the assessment of the impacts on local health services in the SA when the major player in health in the region, and provider of local hospitals, has not been consulted. Note that Western NSW LHD operates the Narromine Health Service.

Council is also concerned that there is no mention of allied health services in the LGA or wider region in the SA. It is not only the primary care services that will be affected.

In relation to the SA Appendix E *Table E1 Health services*, a far more accurate method of describing current health services (and therefore assessing the impact on them) is to describe for example the 'doctor days' currently available in Narromine (ie number of FTE GPs), or the average wait time to access a GP or other allied health professional, rather than the mere existence of a 'Medical Centre' or equivalent.

Council expects much more rigour in assessing the impacts of the incoming workforce on local health providers and services and expects to see, to the satisfaction of Council:

- Accurate descriptions of current health services
- Realistic assessment of impacts on health services as a result of the incoming workforce
- Specific mitigations regarding this issue

Council also expects that the post-approval Workforce Management Plan will contain a specific 'Health Impact' section, developed with the early involvement of Council, Western NSW LHD and local primary and allied health providers. It must be developed to the satisfaction of these groups.

Council will not accept, and the local community cannot afford, 500 plus additional temporary residents (an almost 15% increase to the current population of Narromine) to impact the individual health or safety of its community members, particularly the aged and vulnerable.

2.10 Cumulative social and economic impacts

Council notes the information relating to cumulative impacts of numerous regional infrastructure projects, presented in the EIS *Chapter D1 Cumulative impacts* and from p151 in the SA. From this information, Council estimates that the maximum or peak construction employees of all known projects will be as follows:

Project name	Maximum or peak construction employees
APA—Western Slopes Pipeline	350
Inland Rail – Narrabri to North Star	180
Inland Rail – Parkes to Narromine	n/a
Narrabri Gas Project (Santos)	1,300
Silverleaf Solar Farm	280
Narromine Solar Farm	50
Gilgandra Solar Farm	110
Other projects relating to NSW Renewable Energy Zone	Timing unknown
Total concurrent projects	2,270
<i>Inland Rail - Narromine to Narrabri</i>	<i>2,000</i>
Total cumulative projects	4,270

This clearly shows that the additional construction workforce expected as a result of other projects will be more than double that expected for the N2N Project – being 4,270 in total, of which the N2N Project accounts for 2,000. If all of these projects happened concurrently, this could mean that all the socio-economic impacts described in this submission could be doubled, placing intolerable stress on local facilities and housing, and placing into further question the exact level of economic benefit and costs to the LGA.

The extent to which these cumulative totals will impact the Narromine LGA is not stated in the EIS, although it does note that “cumulative amenity impacts and ‘construction fatigue’ could be experienced especially in Narromine”.

To enable an informed assessment of the impacts of these cumulative projects, **Council requests** that a compilation table be presented to clearly show the timeline of each project with estimates of expected construction workforce numbers and peaks. Only then will the community be able to appreciate the possible scale of the cumulative workforces of all the projects.

2.11 Information regarding affected properties

Council is surprised that none of the sections of the EIS appear to contain clear tabulated lists showing the number and/or size of properties affected by the proposal *in each local government area*. This local understanding can only be found by referring clumsily to the long list of referenced or appended maps.

Council requests that wherever properties within the LGA are assessed in *any* of the EIS sections, that a summary table(s) be presented showing the relevant properties and subsequent affectations *within the LGA*.

2.12 Social impacts of traffic and transport / road safety

Council understands the reality of the situation regarding the proposed rail/road interface along the length of the corridor, and accepts that a certain number of level crossings along the entire rail corridor are inevitable (Road/rail crossings are addressed in section 3.4).

Council requests that further consideration and information be provided about the cumulative impacts of rail crossings and their impacts on traffic be undertaken. Of particular concern is the potential for alternative traffic routes be used by heavy mass vehicles seeking to avoid level crossings and time delays caused by Inland rail.

However, **Council considers** that some of the social and economic issues relating to remaining level crossings have not been adequately dealt with. Insufficient data and evidence has been presented for each potential level crossing to justify the 'risk rating' and dismissal of mitigation measures that is concluded in the EIS (specifically in Chapter B11 *Traffic and Transport* and in the SA section 8.6 *Access and connectivity (operation)*). Council challenges the conclusions made in these sections and considers that the sum total of the disruptions and possible accidents at all the crossings is considered 'major' for this LGA.

Council requests that it be given an early opportunity to contribute to the post-approval Traffic, Transport and Access Management Plan, and that it be developed to the satisfaction of Council. It must also be developed to the satisfaction of local bus operators.

Council is concerned that the risk of collision at level crossings by general traffic, school buses and agricultural machinery at each potential level crossing in the LGA has not been fully analysed. **Council requests** a full analysis be presented for each crossing before a final decision is made about its status as an active or passive level crossing. The social costs of possible accidents and fatalities needs to be factored into the local economic costs (as referred to in the economic impacts section 2.1).

Council disputes the EIS statements about the likely level crossing waiting times and traffic queue lengths, as discussed in section 3.4, especially as it is only presented for one crossing location. **Council requests** data regarding the cumulative costs of the additional waiting time for traffic (especially for agricultural machinery and local commercial traffic, but not to diminish the importance of private vehicles) over the *life* of the Project in its LGA. This becomes more important when considering the likely waiting times for future trains of 3.6km in length. This needs to be factored into the local economic costs (as referred to in the economic impacts section 2.1)

Council is concerned that no assessment has been made of the logistics and difficulties of moving agricultural machinery across level crossings, and **requests** that further information be given in the EIS. This also needs to be factored into the local economic costs (as referred to in the economic impacts section 2.1).

Council is concerned that no analysis has been made of the additional travel time required for journeys resulting from road closures. Consideration of the additional travel time required over the life of the Project as a result of closures in the LGA needs to be factored into the local economic costs (as referred to in the economic impacts section 2.1).

3. Traffic and Transport Issues

3.1 Unclear approval process for increased train length

Council 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 3,600 metres trains that will require a separate approval process.

It is unclear what the approval process for 3,600 m 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.

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

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

Councils have previously identified the need for connectivity between Inland Rail and regional east-west rail lines to ensure movement of regional freight traffic and to facilitate access to existing and proposed intermodals and industrial areas. The EIS does not sufficiently address the issues raised during consultation. Operational degradation and reduced opportunity for regional traffic is an economic, safety and freight efficiency issue which will not be fully addressed by the proposed connections.

SEARS 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 (see section A2.3.2). The connections are described in Table A7.1.

The EIS asserts in Chapter B11 *Traffic and Transport section 11.4.1* 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. **Council 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.

Council 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 with the provision of operationally efficient connections to existing regional lines to both existing and new markets domestically and 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. Taking in account forecast growth in regional train movements due to the implementation of the NSW Special Activation Precincts, and forecast grain markets as 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).

3.3 Incomplete assessment of impacts to Council/Public roads during construction and operation

The EIS fails to provide a complete assessment of the impact to Council/Public roads during construction and operation, relying on the successful contractor to negotiate the Construction Environmental Management Plan (CEMP) and its sub-plan the Traffic, Transport and Access Management Plan. **Council expects** there should be no lasting impacts to Council controlled and other classified roads as a result of the Project. Council request that a rail possession strategy and Traffic, Transport and Access Management Plan be prepared in consultation with both Transport for NSW (TfNSW) and Council to minimise transfer of rail freight impacts to the road network and construction traffic impacts on the road network.

Council requests that any infrastructure approval contain conditions of approval to include;

1. A requirement for a road safety audit to be undertaken by a mutually approved independent consultant and to a mutually approved scope of works, especially for construction related works. A copy of this road safety report to be provided to the relevant road authorities (including TfNSW and Council) for review and endorsement.
2. A requirement for road condition surveys/reports to be undertaken by a mutually approved independent consultant and to a mutually approved scope of works. A copy of road condition reports to be provided to the relevant road authorities (including TfNSW and Council) for review and endorsement. Any damage to roads resulting from the Project to be rectified.
3. Due to the nature of this project and significant unknown impacts on road use and subsequent road condition that could potentially arise during operations, a requirement for assessment and any resultant rectification to be ongoing for a period of up to 10 years post construction or 5 years post commencement of operations; whichever is the greater.

3.3.1 **Failure of risk assessment due to likely material haulage route variation**

In Chapter A8 *Construction of the proposal - section A8.10.2*, four quarries are identified in the Dubbo LGA as the combined source for one million cubic metres ballast and capping material for construction of the entire N2N Project. All quarries are at significant distance from the rail alignment and external to those LGAs directly affected by the Project's footprint. Sourcing quarry material at significant distance will maximise road damage and road traffic safety concerns.

As a civil works entity, Council understands the construction contractor is unlikely to accept the cost impost of long haulage routes and would prefer to source material from approved quarries which are adjacent to the rail alignment. **Council does not consider** the haulage route assessment in the EIS to be representative of a practical material supply strategy for construction of a project with an overall length of 306km. This issue is discussed in more detail in section 4 in relation to anticipated changes in availability of quarry material in the Narromine LGA prior to commencement of N2N construction.

Council is concerned the lack of acknowledgement regarding the likelihood of altered haulage routes of quarry material has resulted in an ineffective risk assessment process for transport and road impacts. Deferment of detailed analysis and risk mitigation until a construction Contractor has been awarded is not an optimal approach due to the significant volume of material to be transported and the associated direct traffic impacts.

Council requests an early and meaningful role in the preparation of the Traffic, Transport and Access Management Plan and the designation of bulk material haulage routes.

3.4 **Failure to address importance of impacts caused by level crossings**

To minimise risks to the public, TfNSW has adopted two policy positions in relation to level crossings as follows:

1. Building new level crossings is to be avoided wherever possible and all other options, including grade separation and use of existing level crossings should be explored and documented before a new crossing is proposed.

2. Public and private level crossings should be closed wherever it is practical and cost effective to do so. Access can be managed by redirecting traffic via an alternate route or, dependant on the benefit, by grade separation.

In addition, the Office of the National Safety Rail Regulator (ONRSR) does not support the construction of new level crossings, it notes that even where active controls are in place, there are still a high number of near misses – in 2017-18 the ONRSR received around 630 notifications of near misses between trains and road vehicles.

As noted in *Traffic and Transport Assessment (TTA) section 5.1.1* fifty-one (51) new public level crossings would be provided along the rail alignment, of which 12 are proposed to have active controls, and 39 are proposed to have passive controls. The EIS states the key traffic impact of the proposal would be on travel time as a result of increased train activity, and therefore increased time of road closure, at proposed level crossings.

The review of the proposed level crossings is based on the following assumptions in TTA *section 6.2.1*;

- i. trains would have a maximum overall length of 1,800 metres
- ii. train speed would be 115 km per hour
- iii. at passive level crossings, traffic would stop 20 seconds before and 10 seconds after a train pass by
- iv. a forecast of 10 trains per day (both directions).

The key assumptions and assessment methodology is inconsistent with the rest of the EIS and appear severely flawed resulting in an assessment inconsistent with the safe operation of a railway network, as follows:

1. Maximum train speed of 115 km per hour is equal to the maximum allowable track speed for Inland Rail. It is overly conservative for assessment purposes to assume all trains will operate at maximum track speed given that in Chapter D6 *Conclusion and justification section D6.1.5* the EIS states "train speeds would vary according to axle loads and range from 80 to 115 km per hour".
2. Fails to incorporate other train configurations which are mandated to run at slower speeds.
3. Fails to address variation in train driver behaviour and operational conditions that result in differences of actual track speed versus posted track speed.
4. Fails to adequately allocate risk of level crossing incidents and address reasons for not adhering to the TfNSW Level Crossing Policy
5. Fails to include additional train movements as result of "improved rail connections" listed in B11.4.1 and solely including base Melbourne-Brisbane intermodal traffic; despite including a total of 8.9 million tonnes of agricultural freight more efficiently diverted to Inland Rail in Chapter D6 *Conclusion and justification section D6.2.2*
6. Fails to adequately assess the cumulative operational impacts of travel times across the region due to introduction of new level crossings, resulting in wait times associated with length and frequency of trains across multiple road sites/routes.

Council requests that ARTC Inland Rail prepare and make public a Level Crossing Report (LCR) for the project infrastructure, which has been developed in consultation with TfNSW and Council, and that the design of any level crossing on a public road be submitted to TfNSW and Council for review and endorsement. The LCR and associated model/s should take into consideration: likely track speed given curve; gradient and infrastructure placement such as turnouts; associated passing loops and network connections. The model/s should be calibrated against historical ARTC Network Operational performance relating to actual train speeds versus sign posted speeds, including Temporary Speed Restrictions on single track sections such as the Main South line. Wherever possible, a commercially available train simulation tool should be used to validate train speeds. Number of train movements

should reflect all Network movements. These assessments should also include impact assessments on existing level crossings that may be affected from increased train movements such Dandaloo Street in the centre of Narromine.

Council is of the firm belief the criteria and methodology used to determine need for a grade separation as stated in TTA *section 5.1.1* (e.g. roads with four or more lanes or four rail tracks) unfairly disadvantages regional areas. Within the Narromine Shire, viable roads requiring grade separation include:

- Tomingley-Narromine Road
- Narromine-Eumungerie Rail Road

The number of heavy vehicles utilising this road and the overall amount of traffic has not been considered adequately in modelling and in view of the overarching policies of TfNSW. The likelihood of a collision needs to be further considered when considering grade separation of the Eumungerie–Narromine and Tomingley–Narromine roads. Further to this the sight distances, gradient and the approach angle of the crossing on the Eumungerie-Tomingley road needs to be also considered.

Council requests to have the proposed active level crossings at Narromine-Eumungerie Rail Road and Tomingley-Narromine Road upgraded to include grade separation. This is an issue of high importance as this route attracts a large external traffic volume to Council roads and is imposing a maintenance cost issue on Council. It is noted separate application has been made under the NSW Government’s Road Classification Review and Transfer project to have these roads reclassified as State Roads. All classified State Roads and other regional roads which are in essence State significant, should all have grade separation with Inland Rail.

Council also requests the existing passive level crossing at Dandaloo Road at Narromine on the Parkes-Narromine Railway (~8km north of N2N southern commencement) will likely receive increased rail movements and Council is seeking to have this crossing upgraded to an active level crossing.

Furthermore, the Council is concerned of the cumulative unintended consequences of multiple level crossings across the wider program of works and operations related to Inland Rail. **Council requests** the LCR is to 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 freight.

3.5 Undisclosed consultation process for Dappo Road closure

In TTA *section 5.1.1* it is stated the “majority of road closures would involve closure near the end of the road and realignment to a new level crossing or around the proposal via an existing road...of the public roads described...only Dappo Road would be completely closed”. **Council requests** the EIS disclose the extent of community consultation undertaken regarding the proposed closure of the eastern end of Dappo Road and provide reasoning for not making provision for a rail crossing at this location.

3.6 Traffic impacts to Webbs Siding Road

Council understands that installation of girder/bridge deck components at the Mitchell Highway will require temporary detour of highway traffic via the local Webbs Siding Road. **Council requests** the EIS commit to undertaking an assessment of impacts by heavy

vehicle traffic to the road surface and assessment of impacts by all traffic to residents of Webbs Siding Road and other local roads.

3.7 Unintended consequential impacts for road traffic

The lack of grade separation of Inland Rail and the Newell Highway south of Narromine is already causing heavy vehicles to avoid delays and divert to other routes which affect Narromine traffic, with Narromine-Eumungerie Rail Road used as a pseudo bypass of Dubbo. The commencement of these unintended bypass routes occurs as far away as Forbes. **Council expresses its dissatisfaction** with the lack of impact assessment in the EIS of consequences caused by traffic emanating from other N2N rail sections.

3.8 Vehicle stacking and storage at level crossings

Council expects that the design will consider sufficient allowance for vehicle stacking (especially heavy vehicles) and storage at level crossings on public and private roads, especially at intersections and driveways/crossovers.

3.9 Provision in design for passage of agricultural machinery

Council 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.

4. Supply of extractive materials

4.1 Unrealistic Dubbo Regional LGA focused supply of ballast and capping material

Council 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.

Council understands that during EIS preparation there existed no approved hard rock quarries in the Narromine LGA. This situation has since changed significantly. Currently, there are four separate quarries, with a combined annual capacity of nearly two million cubic metres per annum, either approved, post development application lodgement or post SEARs lodgement. Approved quarries within the LGA may be required to make a section 7.11- Heavy Vehicle contribution to road maintenance. (Quarries from outside the LGA would not be required to make this contribution to Narromine Shire roads).

Council 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 future construction material resources. The construction contractor must undertake a *Quarry Material Availability Assessment* to identify all quarries approved in the Narromine LGA prior to construction. **Council requests** the undertaking of a detailed sourcing study and associated *Traffic Impact Assessment* in conjunction with TfNSW, Council and existing/potential operators of extractive sites prior to project approval and any subsequent inclusion of additional extractive sites. The study must include volume, quality and economic

analysis to justify additional extractive sites and traffic management plans that cater for various potential options for material sourcing and delivery. 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 (as referred to in section 3.3.1).

4.2 Suitability of large borrow pits to be approved under the critical State significant infrastructure approval process

Council understands that as critical State significant infrastructure, the proposal would be permissible without consent under clause 16(a) of the State and Regional Development SEPP. It would remain subject to assessment and approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The proposal for approval includes not only the rail infrastructure components, but also three large borrow pits proposed for the Narromine LGA at:

- Borrow pit A – Tantitha Road
- Borrow pit B – Tomingley Road
- Borrow pit C – Euromedah Road

Chapter C3 Assessment of borrow pits details the impacts of borrow pit establishment, operation, decommissioning and rehabilitation. **Council does not consider** the rigour of the borrow pit assessment to be appropriate for the scale of each development. It is noted that had approval been sought for any single borrow pit it would have been assessed as 'Designated Development' as described in Part 1, Section 19 of Schedule 3 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) for 'Extractive Industries' with development consent required under Part 4, Division 2 of the EP&A Act. A separate EIS would be required for the application (subject to the SEARs process). Full consideration being given in this process to the likely impact of such an activity on the environment. Accordingly, this type of development would be held to a much higher standard of environmental impact assessment by the Part 4 approval process.

5. Council Road and Drainage Assets

5.1 Independent road dilapidation reporting

Council expects that each public road impacted by construction haulage is to be subject to a Road Dilapidation Report prior to use for construction. The report is to be prepared by an independent and suitably experienced and qualified road designer/auditor approved by Council.

5.2 Asset transfer register

Council expects a detailed asset transfer register be compiled in an agreed format with clear definition of the asset owner following completion of the civil works required for the Project.

5.3 Defect inspections

Council expects all assets transferred to Council will be defect inspected in consultation with, and in attendance of, a Council representative. Any defects identified are to be logged and the rectification method agreed. All culvert assets are to have a CCTV inspection

undertaken in accordance with WSA 05-2020 Conduit Inspection Reporting Code of Australia. These records are to be provided to Council as part of the asset handover package.

Council expects that where the integrity of assets transferred to Council is compromised during a period of up to 10 years post construction and 5 years post operations commencing, that resultant rectification be the responsibility of the proponent. This expectation of rectification includes the upstream and downstream extents of erosion protection treatments of all new culverts and all existing culverts subject to increased inundation.

5.4 Requirements for construction of Council assets

Council expects all road pavement (structural and geometric) and drainage designs to be certified by a Road Designer (per TfNSW requirements). Other road infrastructure assets such as traffic control devices, barriers and signs to be certified by a suitably qualified engineer and approved by a Road Safety Auditor, and provided to Council for concurrence prior to construction.

Council expects certified detailed as-built markups and electronic as-built models are to be provided to Council in an agreed format.

Council expects independent construction certification/verification needs to be undertaken on all Council owned assets or Council be advised and be provided the opportunity to attend critical hold points and inspections per the ARTC and TfNSW specifications.

Council expects all materials used in the works on Council assets (apart from general fill and pavements) are to be new products unless otherwise agreed with Council.

Council expects that sites will be left restored, culverts and assets cleaned and rubbish removed after completion of works at Practical Completion.

5.5 Requirements for Third Party Agreements

The Third Party Agreement between ARTC and Council details all assets, interfaces, responsibilities and funding arrangements for maintenance of shared assets.

Notwithstanding the Third Party Agreement, a defects liability period be imposed for up to 10 years post construction and 5 years post operations commencing.

Council expects the road interface with ARTC to commence at the location where road realignments have been imposed on the local road network.

6. Agricultural and Land Use Impacts

6.1 Direct impacts understated on agricultural land

The EIS describes the overall direct and indirect impacts to agricultural land on a 'regional' basis. **Council has serious reservations** concerning the preparation and interpretation of this regional analysis, caused by the mismatch of scales between this combined region and the six individually affected LGAs (previously discussed in detail in section 2.1).

Following the construction phase, an estimated 1,300 ha of land will be permanently removed from agricultural production, representing 0.04 percent of the total agricultural land across the 'regional' study area. The Narromine LGA will receive a disproportionately higher loss of agricultural land, meaning the EIS understates the actual impact on a local basis. The financial loss estimated in the EA is \$4.25 million annually (value forgone) during construction and \$1.54 million annually during operation. The proportion of this loss to be borne by the Narromine LGA remains unknown, obscured by the regional assessment approach taken.

Council requests the EIS assess the impacts on agriculture using an 'impact corridor' which would more accurately reflect the local nature of impacts on agriculture.

6.2 Property severance impacts

Property severance by the N2N rail alignment affects 142 private properties, comprising 228 lots. **Council is dissatisfied** that the number of impacted properties in the Narromine LGA is not reported in the EIS. It is not possible to estimate how many properties suffer from loss of dwelling entitlements under the 400 ha minimum lot size in the RU1 Primary Production zone under the Narromine Local Environmental Plan 2011, indirectly effecting the potential for the rural community to grow. In addition, where properties are severed, there is an increased likelihood for affected owners to sell to adjoining neighbours and leave the district. This impact on population growth is not discernible from the information provided in the EIS. **Council requests** the EIS identify the number of landholders affected by property severance in the Narromine LGA.

Biophysical Strategic Agricultural Land (BSAL) is high quality agricultural land and potential impacts are described within the EIS using regional mapping undertaken by the Government. The impacts on BSAL appear to be negligible (0.064%). However, it is not clear if there was any site specific validation of BSAL across the Inland Rail alignment, or whether changes in overland flow was considered (i.e. it appears only direct impacts were considered).

Council recommends that the EIS provide some ground-truthing of BSAL land, and assesses indirect impacts on agricultural land (including BSAL) including overland flow and flooding impacts.

6.3 Biodiversity Offset Strategy leading to a reduction of productive agricultural land

The EIS states in Technical Report 11 Agriculture and Land Use *Table 2.2* that sections 7.1 to 7.4 (of Technical Report 11) report the location and area of land that will not be returned to agriculture during Project operation, including areas to be used for environmental plantings or biodiversity offsets (Biodiversity Stewardship sites). This assessment, however, appears to be omitted from the EIS.

Council expects that the EIS should have made a real estimate of sterilised agricultural (including Biodiversity Stewardship sites used for retirement of the biodiversity credits in accordance with the *NSW Biodiversity Offsets Policy for Major Projects*), and from that assumption provided an estimate of the ongoing annual economic impact due to loss of productive agricultural land.

Council recommends the EIS provide an assessment of potential sterilisation of agricultural land as a result of biodiversity offsets, and that the Biodiversity Offset Strategy includes a commitment to prioritise less or non-productive agricultural land to secure for biodiversity offsets.

7. Water and Flooding Impacts

7.1 Uncertainty regarding water demand for construction

It is understood that construction water sourcing on currently constructed Inland Rail sections has been highly problematic. This has been exacerbated by drought conditions. To better understand the risk to existing local water access licence holders, **Council requests** more transparency be provided regarding the construction water demand estimate of 4,635 mega litres and the parameterisation of the water budget. The consideration of drought conditions must be detailed in the water demand assessment.

7.2 Stormwater management

Council expects stormwater management during both construction and operation to consider the conveyance capacity of Council's existing stormwater system assets where discharges are proposed and that upgrades to any Council assets would be the responsibility of the proponent.

7.3 Potential rainfall data limitations for flood impact assessment

Council 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 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.

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

Council 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 (i.e. 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. **Council 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.

7.5 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. **Council 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.

7.6 Potential flooding issue at intersection of N2N and the old Narromine-Parkes rail line

The flood modelling suggests that the project does impact flow coming out of the Sappa Bulga ranges and this results in extensive flood impacts where the new rail line joins the old Narromine-Parkes rail line including the area near Narwonah Siding. It is unclear how significant these impacts are in terms of inundation level, inundation duration, and flood water velocity. **Council expects** more detailed flood assessment to be undertaken during detailed design to ensure flooding at this location is well understood and managed accordingly.

7.7 Future impact on Narromine Town Levee alignment

The EIS does make mention (B3-29) of the future development of a town levee bank at Narromine to protect the township. The levee bank alignment and feasibility options are at an advanced stage and consideration of the potential impacts of Inland Rail need to be assessed. The EIS outlines that “During detailed design, there would be ongoing consultation with relevant stakeholders to review consistency of the proposal with any future flood plain risk management studies and/ or plans developed for the catchments crossed by the proposal site”. **Council expects** further detailed discussion and consideration regarding this important issue for Narromine residents and that discussion be held with representatives from the Department of Planning, Industry and Environment.

8. Cultural Heritage Impacts

8.1 Limitation to Aboriginal Cultural Heritage Assessment Report information for review

A redacted version of the *Technical Report 6 Aboriginal Cultural Heritage Assessment Report* is only available for public viewing. Despite this restriction, the Aboriginal Cultural Heritage Assessment Report (ACHAR) appears to have been prepared in accordance with all statutory requirements for Aboriginal heritage assessment, Aboriginal community consultation, and meets the SEARs. However, the lack of Appendices A, C and E has limited review of the assessment as it pertains to Narromine LGA. **Council requests** assurance the proposal site within Narromine LGA that has been effectively surveyed for Aboriginal heritage and that all appropriate Narromine LGA Aboriginal groups were consulted with.

9. Biodiversity Impacts

9.1 Biodiversity Offsets Strategy to preferentially benefit proximity landholders

Retirement of biodiversity credits must be carried out in accordance with the *NSW Biodiversity Offsets Policy for Major Projects*. Council understands the proponent has sought interest from landholders within 100km of the alignment to potentially utilise their land holdings for offset creation via the Biodiversity Stewardship site process. **Council supports this approach and expects** offsets to be assigned in a preferential order, firstly within 20km, then 50km and thereafter 100km. This approach will increase local biodiversity and increase the likelihood of financial returns to those affected adjacent communities.

9.2 Negative impact of Biodiversity Offsets Scheme on regional development

The large Inland Rail Project will likely significantly impact the Biodiversity Offset Scheme capacity in Narromine region. The N2N Project will likely affect credit availability, which presents a significant risk for Council and developers in the local area. Proponents will be forced to pay into the NSW Biodiversity Conservation Trust. Council understands the Biodiversity Offset Scheme was never intended to be a financially oriented scheme but rather an environmentally focused scheme.

Council requests the State Government undertake a holistic assessment of the Inland Rail Project and its impact on local communities from the point of view of market distortion of biodiversity offsets, and on the ability of future proponents to secure suitable offset credits for development of projects much needed by the regional economy.

9.3 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. Council understands a Biosecurity Management Plan addressing pest flora and fauna species and diseases must be prepared and implemented by the Proponent. **Council expects** early involvement in this Plan, and that it will be completed to Council's satisfaction. Public consultation, particularly with adjacent landholders, will be critical to ensure the likelihood of detrimental incidents are minimised.

Appendix A.

Economic activities recently undertaken by Narromine Shire Council (as discussed in section 2.1.2)

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| <ol style="list-style-type: none"> 1. Development of the next stage of Skypark Residential - complete - 27 lots now for sale. 2. Development of Narromine Aerodrome Industrial Park - complete - 22 lots for sale. First sales in discussion. 3. Development of large industrial estate- feasibility 4. Development of second industrial estate in town- site on Sydney Road already zoned. Private development. 5. Upgrade of road between Dubbo and Narromine- funding confirmed, scope confirmed. Expect to proceed next financial year. 6. Review of Narromine Local Environmental Plan 2011 to ensure rural lifestyle blocks available. Underway. 7. Main street beautification in Trangie and Narromine- ongoing 8. Major improvements to Hierarchy 3 and 4 shire roads- identified. Long term plan for improvement. 9. Upgrade of major public amenities – Narromine Aquatic Centre (master plan complete ¾ done). Cale Oval- master plan complete (funding secured). Burns Oval Trangie (Masterplan complete) 50% done. Rotary Park on river - Master plan complete. Funding to be secured. Upgrade of major playgrounds in Narromine and Trangie. Funding secured. 10. Disability audit of public amenities done. Commenced construction works to improve. Underway. 11. Installation of CCTV in Narromine business district. 12. Development of HubNSpoke shared working space. Narromine. Funding secured. Work underway. 13. Development of aged care accommodation. Work with Timbrebongie House. Funding secured. Planning commenced. Work to commence June 30. 30 residences and shared community area. 14. Development of Dappo Road residential development. Funding secured. Council project. Commence construction June 30. |
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Appendix B.

Data to be provided in both the Social Assessment and future relevant Management Plans (as discussed in section 2.3.3)

1. Baseline data on the housing and accommodation market for each LGA (addressed in section 2.7.2)
2. Baseline data regarding businesses in each LGA
3. Baseline (Census 2016) data regarding characteristics of employed and unemployed people in the LGA – for example skills, education levels, industry sector, age, sex and occupation
4. Better data regarding under-employed populations in each LGA (currently only provided at Statistical Area 4 level at SA Section 6.4.2) (The deficiency of the SA4 is addressed in section 2.12.1.1)
5. The SA table 6.11 *Key economic characteristics by LGA within the regional study area* references 'Regional Development Australia (2019)'. The Reference list of the SA (at p194) cites this full reference as <https://www.rdaorana.org.au/migration/dama/dama-skills-list/> . However, this link is no longer accessible. The exact source of each characteristic given in Table 6.11 should be made.
6. The SA section 6.4.1 *Overview of unemployment rates* only provides LGA data to 2019. More recent data should be provided, and kept up to date in post-approval plans. Monthly data for the SA4 is also available for 2020 – at <https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-australia-detailed/latest-release#labour-market-regions-sa4->

Appendix C.

Workforce Accommodation Facility issues requiring clarification in EIS (as discussed in section 2.8)

1. Whether residents will be encouraged to participate in local community activities and sport etc
2. Likely cost for accommodation per week per person as opposed to renting / buying locally
3. Number and type of employees required for WAF and local employment targets
4. Details of 24 hour operation including timing of arrivals / departures of shuttle buses, residents and supplies and use of outdoor areas
5. Proposed electrical connection
6. Impacts on local telecommunications.
7. Proposed water supply and expected water demand
8. Proposed waste water treatment system and expected EP load
9. Access routes and required road improvements
10. Impacts on local flooding and drainage
11. Access routes during times of flood
12. Details of daily and weekly traffic generation – by shuttle buses, residents, suppliers and employees
13. Details of the type and level of health and emergency services provided on site
14. Details of the type of recreational activities provided on site

Appendix D.

Items /issues that Council expects to be included in Workforce Accommodation Management Plan (as discussed in section 2.8.1)

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|---|
| <ol style="list-style-type: none">1. Site analysis, detailed layout, plans, elevations and sections2. Landscaping3. External lighting4. Electrical connection5. Water supply to the satisfaction of Council6. Facilities provided in each unit7. Dining and kitchen facility details8. Recreational facility details (indoor and outdoor) to the satisfaction of Council9. Resident behaviour policy including monitoring of consumption of alcohol on site10. Information (coordinated by Council) welcoming residents into the community, including information about local businesses, services, recreation, cultural and sporting activities and organisations11. Strategies for assisting residents to access local facilities and services, including use of shuttle buses12. Access routes to the site for shuttle buses, residents, employees and suppliers and improvements and changes to intersection and road infrastructure to the satisfaction of Council13. Access, drop off, parking and delivery infrastructure and arrangements to the satisfaction of Council14. Access routes and arrangements during times of flood to the satisfaction of Council15. Waste disposal and recycling arrangements to the satisfaction of Council16. Local employment arrangements and targets to the satisfaction of Council17. Local procurement arrangements and targets (including local suppliers and producers) to the satisfaction of Council18. Arrangements for medical, health and emergency services on site to the satisfaction of Council19. Neighbour and community engagement plans and complaint mechanisms, to the satisfaction of Council20. Infrastructure to remain on site after closure of facility ('legacy issues') to the satisfaction of Council (see section 2.7.4) |
|---|