

Mr M Fallon

Team Leader, Transport Assessment

NSW Department of Planning, Industry and Environment

Locked Bag 5022

PARRAMATTA NSW 2124

Dear Sir,

Re: Submission on Environmental Impact Statement, Inland Rail – Narromine to Narrabri Project

This is my submission on the Environmental Impact Statement (EIS) for the Inland Rail Narromine to Narrabri (N2N) project. I am in favour of the project however I have serious reservations about the route adjoining Narrabri.

My Background

I am a Narrabri local having been born here in March 1954.

I have lived in Narrabri for all but three and a half years when I was at university.

I have a Bachelor of Surveying (honours) degree and a Bachelor of Arts degree.

I have been a Registered Surveyor since 1980.

I have undertaken surveys in the Narrabri area for more than forty-six years.

I owned a surveying business located in Narrabri from October 1983 until September 2019.

I was Deputy Mayor of Narrabri Shire Council from March 2004 until September 2008.

My Submission

I am strongly in favour of the Melbourne to Brisbane Inland Rail Project. I have, however, major concerns with the route selected near Narrabri.

Because I am a local and because of my occupation I believe that I am highly qualified to comment on the proposed route for the Inland Rail and the alternative routes available.

My submission is based solely on my concerns over the proposed route near Narrabri and my comments relate only to this section of the project.

There is a far more suitable route than the one proposed.

Inadequacies of the Environmental Impact Statement

The EIS is deficient in so many areas and glosses over many of the problems associated with the proposed route. Some of these omissions or deficiencies are as follows:

The flood modelling seems to be wrong. It disagrees with the modelling done for Narrabri Shire Council for the Narrabri Flood Management Plan. Two of the glaring problems with the modelling are that firstly, the assumption that the proposed pylons will not collect debris and thus will have no effect on flooding. This is patently incorrect. A second problem is that no account has been taken of the effect on or by Mulgate Creek.

These are just two of the problems with the modelling and by not including them the effects of flooding have been decreased.

No **Vegetation Management Plan** has been presented. Surely this is necessary to adequately assess the proposed route.

No **proper heritage assessment** has been made but rather, it appears, a desktop audit and, in some parts, a drive by inspection. No comprehensive ground truthing seems to have been undertaken.

No **Traffic and Access Management Plan** has been prepared. This is critical for proper assessment.

No **real consideration has been given to the social impacts** on the people of Narrabri.

No **real Visual Impact Assessment** has been carried out.

Inadequate noise assessments have been carried out. A number of residential properties will be affected by noise and these seem to have been ignored.

Proposed Route Disadvantages

The proposed route has several major problems, some of which are:

- A new bridge is required over Bohena Creek.
- At a point about 5.7km north of Bohena Creek the edge of Bohena Creek is only about 50 metres from the Newell Highway formation. Squeezing the new line into this gap will cause problems and major disruption to highway traffic during construction.
- A new bridge is required over Spring Creek.
- The route crosses the Namoi River floodplain is at one of its widest locations. A bridge/viaduct of about 4.0 kilometres will be required.
- The bridge/viaduct will increase flood levels, above what the EIS predicts.
- Access to the Narrabri Sewage Treatment Works will be compromised.
- There is interaction with seven major powerlines in a confined area west of the treatment works.
- The increased transport during construction will have a major impact on Narrabri Streets and local traffic. The EIS states that there will be 82 light vehicle movements and 336 heavy vehicle movements per day. Looking at just the heavy vehicle movements, if construction is carried out for 12 hours per day this means a heavy vehicle movement every 2 minutes and 8 seconds. This is clearly a significant negative impact. Even if the construction time each day is increased to 16 hours this means a heavy vehicle movement every 2 minutes and 50 seconds. Again, this is significant.
- The route through Narrabri will cause major problems for landholders. Many of the properties affected are smaller holdings. Those that have their properties resumed will be the lucky ones. Those that are left adjacent to the route will have varying problems including noise, flooding, access, visual effects which will have severe social impacts on their lifestyle.

- It is proposed that once constructed there will be 10 trains per day in 2025 rising to 14 trains per day in 2040. For 2025 that is a train every 2 hours 24 minutes. These trains are to be 1.8 kilometres long and travelling up to 115 kilometres per hour. The trains are about 6.5 metres high. This height is substantial and this does not even account for the height of the rails. In the section where the bridge/viaduct exists the viaduct is about 6 metres high. In that section the top of the train will be about 12.5 metres above the ground level. Such frequency, size and speed in either case will have a very significant negative impact on the social life of people in Narrabri and its immediate surrounds. **This is unacceptable.**
- The bridge/viaduct will have a major negative visual impact for the people of Narrabri. The bridge/viaduct will have about 160 pylons. There will be a long-term negative impact on Narrabri people and appears to have been ignored.
- Once the trains leave Narrabri they will have to negotiate the 5.8 kilometres long route over Knights Hill with 5 bends included. A far more sensible flat route with less bends is available.
- **The extent of clearing** on the proposed route is substantial. Where the route follows Newell Highway south of Narrabri a corridor of trees, both hollow bearing and otherwise, will be removed. While it is accepted that such clearing is necessary through Pilliga Scrub, if an alternative route was chosen such clearing near Narrabri would be unnecessary.

Alternative Route Advantages

An alternative route is available which will remove virtually all the problems associated with the proposed route. This route is shown in the attached map at the end of this submission and is designated Alternative Route 3. This route was first suggested by a local businessman Tim Logan and there have been some minor modifications to the original suggestion however the basics of the alternative route are the same. The line would run northerly on the eastern side of Kiandool Lane (and its extension to the south) from near the Leewood Gas Facility for about 19 kilometres until it is north of Culgoora Road and then turns to the northeast to cross upstream of Mollee Weir at Namoi River and join the existing Narrabri-Moree railway line approximately opposite Murrumbilla Lane. Some of the advantages of this route are:

- No bridge is required over Bohena Creek.
- No disruption of Newell Highway traffic will be required south of Narrabri.
- No bridge is required over Spring Creek.
- The bridge/viaduct will only need to be about 2.0 kilometres long rather than 4.0 kilometres.
- There will be virtually no increase in flood levels.
- There will be no problems with access to the treatment works.
- There will be no powerline interaction within a confined area.
- The construction traffic will be taken away from Narrabri town streets onto rural roads. The construction should be able to be organized to use a haul road adjacent to the train line.
- **NO DWELLINGS ARE AFFECTED.** The number of property accesses affected is minimal. Some work would need to be undertaken at the access to Wilga Park Power Station.
- The impacts from noise, flooding, access, visual effects on the alternative route are relatively minor. The visual effects will be considerably decreased because of the shortened bridge/viaduct and the significantly reduced number of dwellings affected.
- The route is relatively flat with no need to negotiate Knights Hill.
- The clearing of vegetation is significantly less than the proposed route.
- The land affected is generally grazing land, not larger residential lots or dryland and irrigated cropping land.

Comparison of route distances and structures

The distance of the alternative route has a distance of about 38.8 kilometres.

The distance of the proposed line between these two points is about 38.0 kilometres. Of this length about 29.6 kilometres is new construction and 8.4 kilometres is upgrading the existing line north of Narrabri. Of this upgrade about 5.8 kilometres will be the section around Knights Hill with at least five bends which will almost certainly need significant work.

The alternative route needs only about 2.0 kilometres of bridge/viaduct compared to 4.0 kilometres on the proposed route.

There should be two less bridges (Bohena Creek and Spring Creek) required on the alternative route.

The alternative route could have about six bends compared to about twenty for the proposed route.

Northern NSW Inland Port

There is a misconception amongst Narrabri people that the trains will stop and receive freight from the Northern NSW Inland Port. The Inland Rail trains do not stop at Narrabri. There is no need to have the Inland Rail located close to Narrabri to access the Inland Port. Even if businesses at the Inland Port are eventually able to put their own trains on the Inland Rail tracks, the alternative route is a similar distance to the Inland Port as the proposed route being a distance of about 4 kilometres.

Conclusion


For local people that have a knowledge of the area around Narrabri and people who have the professional skills to assess the proposed route against the alternative route, there is no doubt that the alternative route is much better.

The alternative route should provide cost savings for the project.

The alternative route will see significantly fewer negative impacts from the project.

It is unacceptable that when such a viable alternative route is available that the proponents of the project would choose to severely disrupt the lives of Narrabri people during construction and long-term. The EIS should be rejected in relation to the route near Narrabri and the proponents be required to thoroughly investigate the alternative.

Yours faithfully



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Inland Rail- N2N Proposed and Alternate Route Final

Legend

- Alternate Route 3
- Existing Route

Narrabri

Turrawan

Jacks Creek



10 km

Google Earth

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