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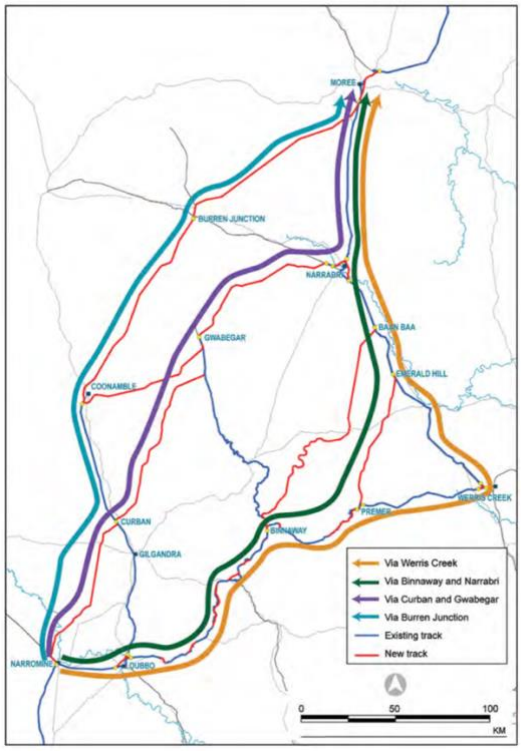
23rd September, 2022

To: NSW Planning **–** Inland Rail - Narromine to Narrabri SSI-9487 Response

Att: Mick Fallon mick.fallon@planning.nsw.gov.au.

North West Protection Advocacy are a Coonabarabran-based grassroots advocacy group. We have a strong interest in ensuring that the Pilliga forest area is protected from inappropriate development. NWPA have been following the development of this particular section of the Inland Rail for several years. We sustain our objection to the rail cutting the Pilliga in half when it should go around it to the west providing enormous benefit to the Coonamble and Burren Junction region as per the map below.

FIGURE 13 Parkes to Moree route options schematic



We take this opportunity to thank the ARTC for their responses to our concerns and regret that due to time constraints we have not been able to provide as comprehensive a response as we would like. We note that of

the 116 submissions made only 7 were supportive. The majority of the submissions held objections while the rest consisted of comments with mainly concerns about route alignment.

Our submission supports the submissions of Peter Holt Ebsworth & Ebsworth Lawyers (on behalf of NSW Farmers members), Andrew Knop (landholder), Dan Clarke (Botanist & member of Aust. Plant Society), Jennifer Knop (landholder), Alan Channell (landholder).

This comment from Andrew Knop is of particular concern: *"Having taken the time to attend ARTCs forums it is very concerning to find that ARTC failed to record a single N2N community biodiversity consultation observation. This indicates ARTC entered a critically important public consultation phase with no procedure or protocols to record or use community information to help inform the EIS process. As such the proponent has failed to meet SEARs requirements and the EIS should be rejected."*

Despite the best attempt of the ARTC to respond to community concerns we note that there has been significant media attention and sustained objection to several of the route alignments across the project. Wagga Wagga Council has questioned the veracity of Noise and Vibration data https://www.railpage.com.au/news/s/scathing-review-of-inland-rail-project-as-council-accuses-rail-corp-of-inaccurate-data NWPA already hold concerns for the biodiversity impacts on fauna in the Pilliga forest, if the data is inaccurate we could well see serious irreversible impacts.

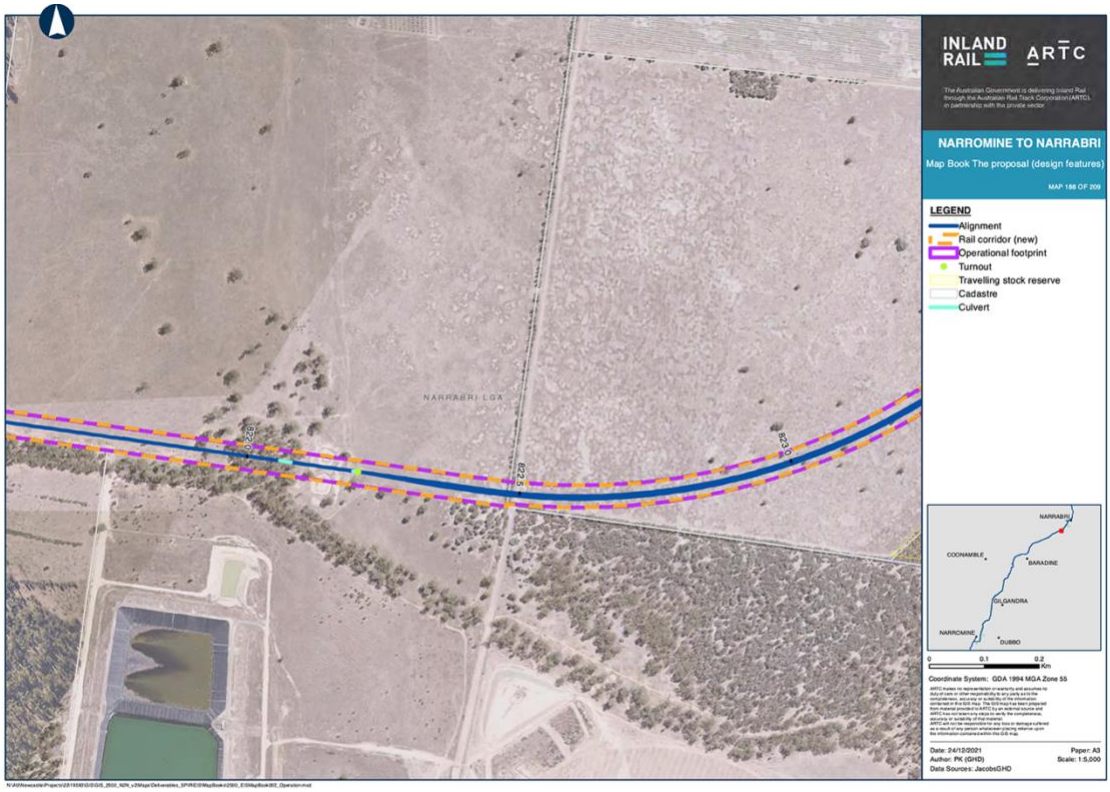
Another piece of media quotes Santos: https://www.theguardian.com/australia-news/ng-interactive/2022/jan/25/trouble-on-the-tracks-is-australias-40bn-inland-rail-project-going-off-the-rails Santos told Guardian Australia the gas project would not benefit from the inland rail, but its own media releases tell a different story. "*Narrabri is ideally located for new manufacturing with nearby access to the new inland rail linking key east coast ports and the national highway system,"* a Santos release from August 2019 says.

Santos Leewood Facility:

Major facilities	
Leewood	• a central gas processing facility for the compression, dehydration and treatment of gas • a central water management facility including storage and treatment of produced water and brine • optional power generation for the project • a safety flare • treated water management infrastructure to facilitate the transfer of treated water for irrigation, dust suppression, construction and drilling activities • other supporting infrastructure including storage and utility buildings, staff amenities, equipment shelters, car parking, and diesel and chemical storage • continued use of existing facilities such as the brine and produced water ponds • operation of the facility
Leewood to Wilga Park underground power line	• installation and operation of an underground power line (up to 132 kV) within the existing gas pipeline corridor

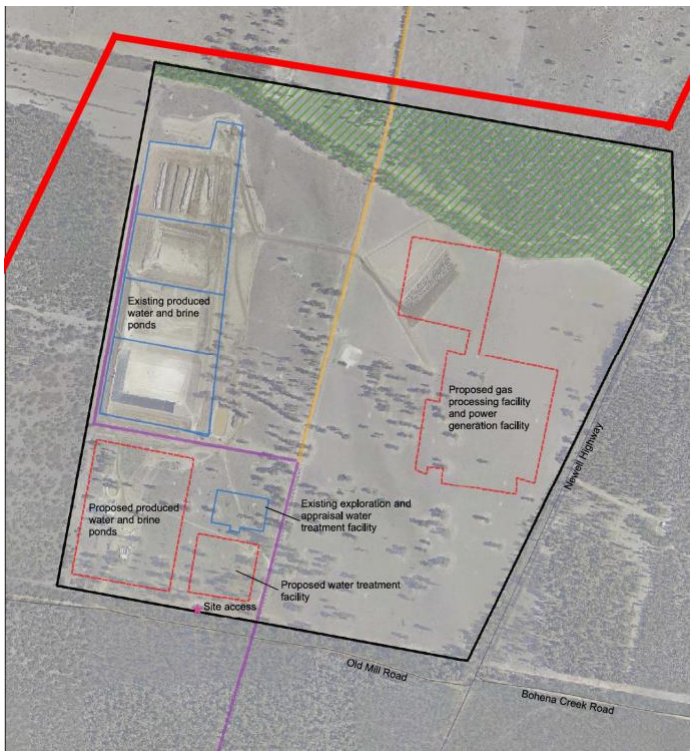
Please note: The third bullet point above was not given consent by the IPC.

In light of your new information and detail that shows just two culverts planned to the north of the Leewood facility we raise these concerns about potential flooding at Leewood. We have seen an increase in significant rain events in the last few years and predictions do indicate that these events are to become more frequent and severe.



We provide these images for your information and awareness. The facility is subject to significant drainage flow. In wet weather (these taken in September 2016) this is what the Santos facility looks like. ARTC have detailed that two culverts will be installed on the northern side of the facility as per this image.

The red line indicates the route alignment in the two images below.



The image below shows the drainage channel that traverses the Leewood facility diagonally from the south-west corner to north-west. It flows through the area where Santos wish to build their gas-processing facility, crystalliser and managed released infrastructure (Narrabri Gas Project EIS).

Has the risk of the ponds overflowing or failing been considered with the design of the alignment and culvert system?

Has the ARTC consulted with Santos about the possibility that the alignment of the track on the northern side of the Leewood facility could potentially impact the facility negatively by holding back this flow of drainage?

The image below is taken from the Leewood REF page 16 of the pdf (REF_-_Leewood_Produced_Water_Treatment_-_Appendices_1_to_11-_June_2015)

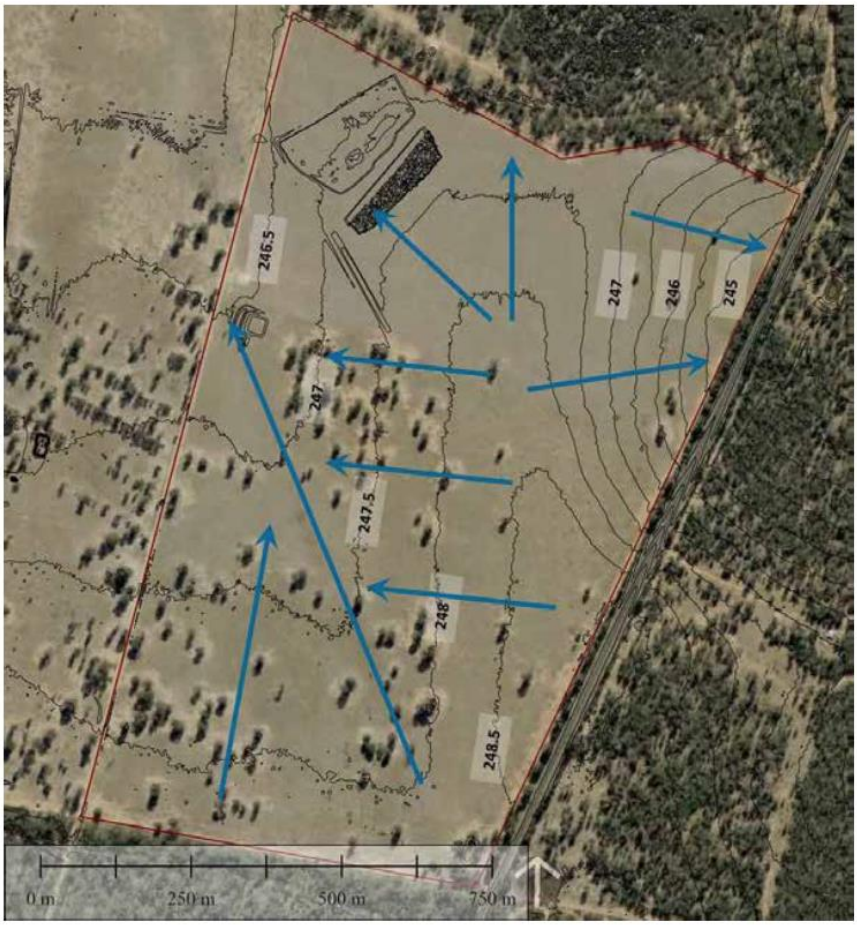


Figure 3 Topography and drainage patterns of prospective irrigated area

The Santos Narrabri Gas Project EIS Biodiversity Appendix J2 states on Page 251:

Does this alignment have the potential to negatively impact the endangered Regent Honeyeater which is known to visit the north-east corner of the Leeward facility?

Furthermore, the species was not recorded during targeted surveys or general fauna surveys for this project (for methods see **Section 5.3.3**). Regent Honeyeaters have been recorded sporadically in the Pilliga (in 1991, 1992, 1997 and 2003; OEH 2014a). These previous sightings of Regent Honeyeaters in the Pilliga Forest have been largely associated with drainage lines (OEH, 2016a). Their distribution in the Pilliga may fluctuate based on episodic eucalypt flowering, including *E. albens* beyond the Pilliga. Minor

Further to the presence of this species on drainage lines, the remnant vegetation in the north-east corner of Leewood facility is likely habitat for the Regent Honeyeater being adjacent to the drainage line that runs through the facility.

Below is a table from the Leewood Ecological Assessment that shows the species that are to be potentially impacted by Santos. Has the ARTC considered the cumulative impact of the rail route alignment close to the Santos boundary on these species?

4.2.2 Species with potential to be impacted

The species in **Table 3** have potential or are known to occur on the site and have potential to be impacted by the proposed activity (see **Appendix A:**). An assessment of significance has been undertaken for these species.

Table 3: Species and communities considered potential, likely or known to occur on the site with potential to be impacted

Scientific name	Common name	TSC Act	EPBC Act
Anthochaera phrygia	Regent Honeyeater	CE	E, M
Ardea alba	Great Egret, White Egret	~	M, Mar
Ardea ibis	Cattle Egret	~	M, Mar
Chalinolobus dwyeri	Large-eared Pied Bat	V	V
Chalinolobus picatus	Little Pied Bat	V	~
Chthonicola sagittata	Speckled Warbler	V	~
Circus assimilis	Spotted Harrier	V	~
Glossopsitta pusilla	Little Lorikeet	V	~
Hamirostra melanosternon	Black-breasted Buzzard	V	~
Hieraaetus morphnoides	Little Eagle	V	~
Lathamus discolor	Swift Parrot	E1	E, Mar
Macropus dorsalis	Black-striped Wallaby	E1	~
Melanodryas cucullata cucullata	Hooded Robin (south-eastern form)	V	~
Merops ornatus	Rainbow Bee-eater	~	M, Mar
Miniopterus schreibersii oceanensis	Eastern Bentwing-bat	V	~
Ninox connivens	Barking Owl	V	~
Nyctophilus corbeni (syn. *Nyctophilus timoriensis* (South-eastern form))	South-eastern Long eared Bat / Corben's Long-eared Bat	V	V
Phascolarctos cinereus	Koala	V	V
Pomatostomus temporalis temporalis	Grey-crowned Babbler (eastern subspecies)	V	~
Pteropus poliocephalus	Grey-headed Flying-fox	V	V
Saccolaimus flaviventris	Yellow-bellied Sheathtail-bat	V	~
Stagonopleura guttata	Diamond Firetail	V	~
Tyto novaehollandiae	Masked Owl	V	~
Vespadelus troughtoni	Eastern Cave Bat	V	~

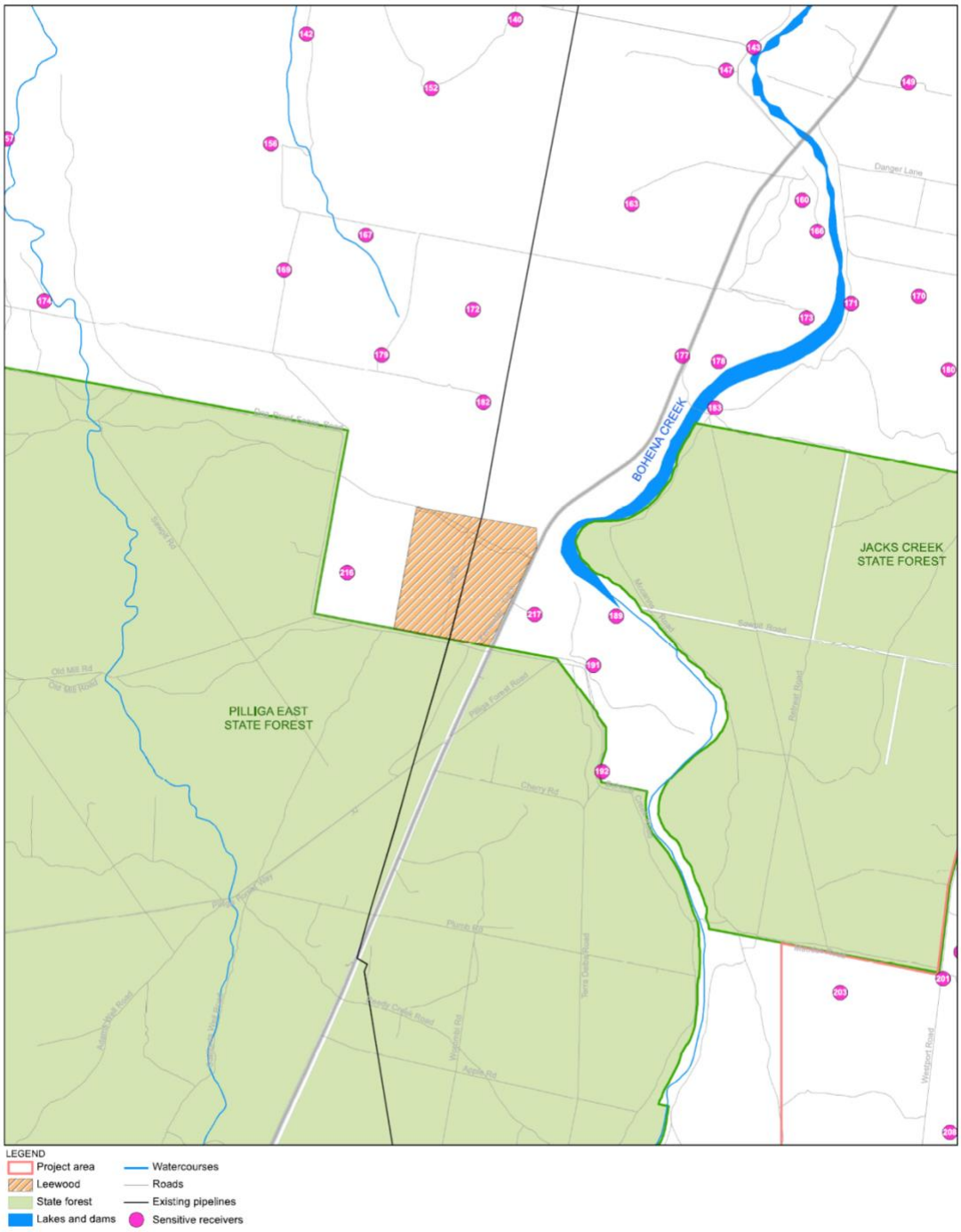
Whilst Santos have stated that they planned to minimise impacts from their infrastructure by placing major facilities such as Leewood outside of the main forested body of the Pilliga the addition of the Inland Rail increases exponentially the cumulative impact of the Leewood facility. In short, the Inland Rail, by running congruent to Leewood is increasing impacts and could lead to the sustained inundation of the remnant vegetation on Leewood by surface water run-off.

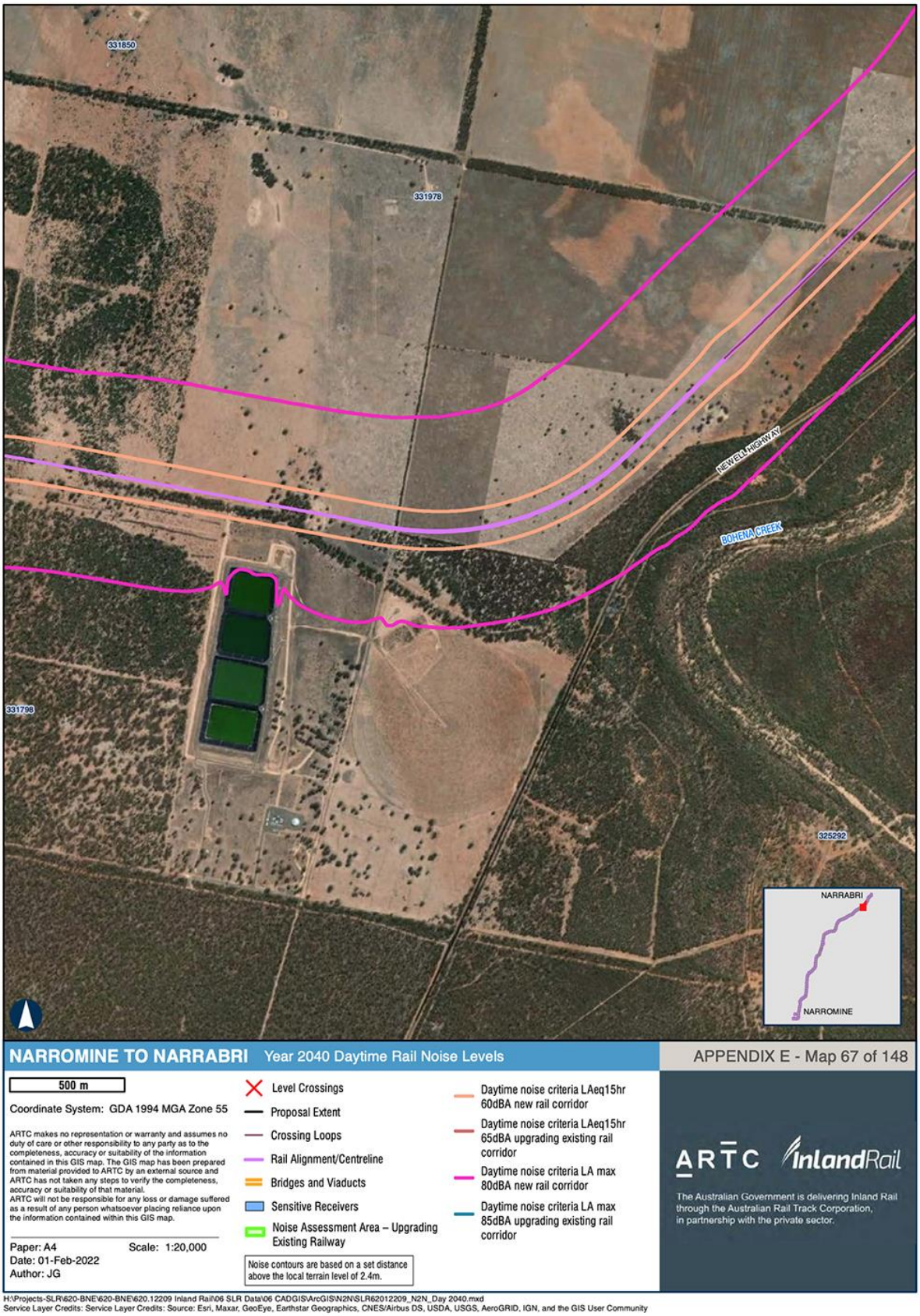
This surface water may then seek an avenue for dispersal eastwards along the embankment of the rail route and cause further impacts on Santos' mapped Managed Release area. Please review the drainage diagram above.

Cumulative noise impact

Leewood is classified as a major facility but no assessment appears to have been conducted by the ARTC on the additional issues of cumulative noise and vibration impacts.

Figure 6: Receiver Locations – Leewood





Santos state that cumulative impact from “other industries” has not been assessed for.

Business Case:

The reality of the cost blowouts in the N2N section alone need investigation. It makes no sense to build this infrastructure greenfield through the Pilliga forest and regional floodplains at huge cost and dissent from landowners whilst totally avoiding the higher country of Coonamble where landowners want the rail.

Inland Rail 2015 Business Case

IRAS 2010 Appendix J (p.32)

Table 6-3 Narromine to Narrabri North construction cost estimates

Type of works – Greenfield Contract type – Design and construct	Length – 306.8 km Duration – 112 weeks
Earthworks Excavation: 915,000 m^3 Fill: 3,039,000 m^3	**Bridges and culverts** 15 – 50 m – 33 off, 855 m total length 51 – 150 m – 22 off, 870 m total length 151 – 300 m – 9 off, 1,975 m total length Culverts – 180 off, 560 m total length
Track and formation Class1C track –306.8 km Turnouts – 9 off Loops – 7 off	**Tunnels** None
Level crossings and road crossings Minor road crossing – 2 off Active level crossings –3 off Passive level crossings – 106 off	**Miscellaneous structure** Road re-alignments – 1.8 km Road closures – 15 off
Cost per km- $2,468,000	**Total cost - $757.3m**

Narromine to Narrabri
Base cost evaluation

Bridging Total: 3.7km
Culverts Total: 0.56km
Road re-alignment Total: 1.8km
Utility Adjustments: Nil

Project Actuals 2022

Bridging: 15 km minimum
Culverts: 13km minimum
Road re-alignment: 37 km
Utility Adjustments: 192

The submission below from Taje Fowler (Wiradjuri First Nations) stands out to us and we are concerned that the ARTC has not responded fulsomely to the concerns that surveys were conducted during severe drought nor has the ARTC a plan for the concerns about restoration of culturally significant plants.

Object NARROMINE , New South Wales

I submit my objection to this project as a First Nation woman descendant of the Wiradjuri and the Wurundjeri nation with deep ties and obligation to protect our country. I am also a community member of the Narromine CCC of the Inland Rail project.

Consultation & Biodiversity issues
Recent I submitted questions to ARTC as to why they are clearing farmland containing native bushland to establish new quarry pits when many existing quarry businesses are located near-by and many are closer to the project. ARTC's response to me was to look my own answers up in their EIS document.
I am very unhappy with this response and have found the EIS to be lacking in any explanation. I object to ARTC's handling of my concerns as to why can't they answer the questions? ARTC should support legitimate quarry businesses in our community rather than destroying 20 hectares of native bushland and grasslands.
The EIS rehabilitation strategy has no way to restore culturally significant plants such as lilies, orchids, rushes and other herbs in their strategy. These plants have significance for First Nation people and with less than 5% of our country with any bushland left it is not acceptable to destroy more when alternative options are located nearby.
The assessments of all the sites was undertaken during a severe drought and basically describe everything as poor condition. ARTC seem to have little idea what they will be destroying. How much time will be spent surveying for plants before it is excavated and lost? They say seed will be collected, how much time will be allocated to collecting and will all species be collected? Bushland is more than just trees, it is all the plants and animals on country.
This EIS does not have answers for our communities. ARTC does not consult with community it spends all its time and resources promoting the project. This EIS has insufficient detail for the community. ARTC needs to put this detail so the community knows how and why decisions were made and how ARTC are going to repair all the landscapes they will be destroying.

We would like to draw the Departments attention to new information regarding policy recommendations for infrastructure placed on floodplains.

Recommendation 28 of the NSW flood Inquiry states:

Essential Services and Floodplain Infrastructure
That, to minimise disruption to essential services (power, communications, water, sewerage) and to ensure flood infrastructure is fully serviceable before flooding, Government ensure:

- essential services infrastructure (communications, water, power and sewerage) is situated as much as possible above the flood planning level. And to minimise disruption to medical services, aged care services and the police, Government ensure hospitals, medical centres, nursing homes, aged care facilities and police stations are situated above the probable maximum flood level
- floodplain infrastructure (drains, levees, flood gates) items are all assigned to an appropriate lead agency which has responsibility for ensuring they are fully maintained and functioning especially when floods are likely

Supported in principle – further work required on implementation
The NSW Government will ensure future essential services infrastructure development occurs above the flood planning level, where appropriate. Consideration will be given to how to encourage private sector essential infrastructure developers to take the same approach.

Has ARTC considered this recommendation and implemented forward planning to address this in principle supported recommendation?

Alternative options

The ARTC has stated the trains will be powered by diesel. NWPA raise the issue of supply chain disruptions to diesel fuel and NSW and Australian Government stated sustainability objectives/net zero targets etc. Has the ARTC considered any alternatives?