

19 September 2022

Mick Fallon  
Planner  
NSW Department of Planning & Environment

Re: Local Land Services submission on the Narromine to Narrabri Project Preferred Infrastructure Amendment Report.

Dear Mr Fallon,

Thank you for the invitation to review and provide comment on the Narromine to Narrabri Project Preferred Infrastructure Amendment Report. North West Local Land Services has attached it's previous correspondence on this issue in Appendix A to provide context to support the current submission.

Local Land Services has identified 3 issues for comment:

## **Calrossie TSR**

Regarding TSR R44590, NWLLS requests that ARTC consult with the Local Land Services in relation to providing access to the waterpoint on Spring Creek.

## **Culverts - General**

Local Land Services requests a formal undertaking from ARTC outlining culvert management inclusive of desilting and debris removal; annual inspection program; and 'trigger' points to reinstate culvert functionality. Many of our stock crossings, and greater TSR regional functionality, rely on functioning culverts. If any level of silt/sludge is left in the culvert it will not be practical to walk sheep through.

## **Rail corridor alignment through travelling stock reserve (TSR) R27999 (Arrow TSR)**

No change to alignment of the rail corridor to outside of TSR (6/1195493 and 7/1195493) has been proposed by the proponent.

The proposal aligns the corridor to the south-eastern portion of the Lots, creating an approximate 45m wide and 700m long corridor for livestock to walk through the TSR. The corridor will narrow to 25m when adjacent to the Narrabri Sewage Treatment Plant.

It is the view of Local Land Services that the mitigation measures proposed are insufficient and a high level unacceptable risk to human and livestock safety remains.

The proponent points to the report provided by *Protein Production Vets, 'Use Impact Assessment – North Narrabri Section of Travelling Stock Route and Proposed Route of Inland Rail'* to attempt to mitigate the safety risks to people and livestock of the rail alignment through the TSR.

Local Land Services has identified the following issues with the report:

1. The scope of the report is limited to *'reduce impacts on human and animal health and safety, as well as limiting disruption to rail movements.'* In response, the author has assumed the rail alignment will not change and has focused on reducing risk rather than considering the implications of all options to protect the safety of people and livestock such as establishing an alternative TSR area or re-alignment of the rail corridor.
2. The author has based recommendations on unknown levels or risk. For example,
  - a. *'Once noise/vibration levels and effects on stock are known'* – it is clear the author is unsure of the effects the close proximity of the large fast moving train will have on variable age/type of livestock.
  - b. *'Effects on moving stock are variable and will depend on individual animal circumstances.....Meanwhile animals that have not seen these pressures before may react unpredictably'* – This statement from the author illustrates the difficulty in predicting animal behavior and the associated inability to feasibly quantify risk to adequately protect human and livestock safety.

In summary, irrespective of best intentions, it is highly likely livestock and livestock managers will be caught in the narrow laneway with the large fast train. The proponent has built its risk management approach and proposed safety mitigations on *'unknown'* and *'unpredictably'* animal behaviour. For these reasons Local Land Services objects to the proposed rail alignment through TSR (6/1195493 and 7/1195493) based on the inability of the proponent to describe, quantify and adequately mitigate the risk to people and livestock.

Please contact myself if you require further information or clarification.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Hutchinson-Smith', with a large, stylized loop at the end.

**James Hutchinson-Smith**  
General Manager  
North West Local Land Services

## Appendix A – LLS Submission on ‘Draft Amendment & Preferred Infrastructure Report for the Inland Rail Narromine to Narrabri Project (SSI-9487) – 25<sup>th</sup> February 2022

North West Local Land Services  
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25<sup>th</sup> February 2022

Mr. Michael Young  
Principal Planning Officer  
Transport Assessments  
e: [michael.young@planning.nsw.gov.au](mailto:michael.young@planning.nsw.gov.au)

Dear Michael

### Re: Inland Rail Narromine to Narrabri Project (SSI-9487)

Thank you for the invitation to review and provide comment on the final Submissions Report and the draft Amendment and Preferred Infrastructure Report for the Inland Rail Narromine to Narrabri project (SSI-9487). North West Local Land Services have identified two key areas of concern and impact to the Travelling Stock Reserve functionality within the region that in our view remains not adequately mitigated.

#### 1. Rail corridor alignment through travelling stock reserve (TSR) R27999 (Arrow TSR)

##### NW LLS Comment on initial Consultation

The rail corridor is proposed to traverse folios 6/1195493 and 7/1195493 immediately north of Narrabri. These lots are a key component of TSR R27999 which facilitates the movement of walking livestock within the region and forms a major junction and connection point for walking stock at the regional level. The loss of the ability to move stock along these lots will have a major adverse impact on the functionality of TSR network.

The proposal to align the corridor to the south-eastern side of the lots will create an approximate 40-metre wide and 700-metre long corridor for livestock to walk through. It is likely that stock, including large mobs of cattle over 1,000 head, will not always move through this long corridor quick enough to avoid all passing trains. This will create risks for livestock, stock managers and road users such as those on the high-use adjoining Newell Highway. These risks extend to livestock within holding yards in close proximity to the passing trains.

Running the rail corridor through the identified lots would not be possible without raising the risk to TSR users and livestock to an unacceptable level.

##### ARTC Response

ARTC acknowledges that travelling stock reserves are important to the agricultural industry and that it is important to provide a safe environment along the reserves. Following exhibition of the EIS, the proposed alignment through this reserve has been changed, as described in the combined Preferred Infrastructure/Amendment Report, to minimise impacts on its ongoing usage.

In accordance with mitigation measure LP12, ARTC would continue to consult with North West Local Land Services during detailed design to confirm how impacts on travelling stock reserves would be minimised during construction and operation. Alternative access arrangements would be made, as required, subject to maintaining rail safety

##### North West Local Land Services Comment to response.

The North West Local Land Services have been consistent with its position in that the rail alignment through this narrow laneway of TSR, along with its close proximity to a high-volume public highway presents an unacceptable risk to TSR users, livestock, TSR field maintenance staff and the general public including motorists and heavy vehicle movement. The North West Local Land Services principal concern relates to the unpredictability of livestock in confined space and their reaction to sudden high noise or sudden movement.

TSR Rangers with 20+ years' experience in managing livestock movement along TSRs have provided expert comment to ARTC consultants supporting these safety concerns.

To date, ARTC have proposed two mitigation options

1. Minor realignment of the track through the laneway
  - a. This would achieve no significant improvement to the existing risks

2. Erection of steel “cattle yard” type fencing along the laneway

- a. This would significantly increase the risk to drovers, plant animals and TSR maintenance staff, with limited escape options from alarmed livestock

North West Local Land Services have advised ARTC that they are unable to support either of these proposals. The North West Local Land Services remains committed to its undertaking in their original response in that;

*“These lots are a key component of TSR R27999 which facilitates the movement of walking livestock within the region and forms a major junction and connection point for walking stock at the regional level. The loss of the ability to move stock along these lots will have a major adverse impact on the functionality of TSR network.”*

**Requested Action:**

That ARTC construct the rail alignment away from TSR R27999

Or

That ARTC negotiate an alternative TSR bypass for the safe movement of livestock away from TSR R27999

**2. TSR R44590 and R941—Calrosie TSR continued access**

**NW LLS Comment on initial Consultation**

The proposed alignment of the track will not have any major impacts on the TSR; however, access will be required to R44590 as there are no private property entrances between Bohena Creek and Spring Creek.

**ARTC Response**

As noted above, access across the proposal site would be provided under the Bohena Creek bridge and, in accordance with mitigation measure LP12, ARTC would continue to consult with North West Local Land Services during detailed design to confirm how impacts on travelling stock reserves would be minimised during construction and operation.

Alternative access arrangements would be made as required, subject to maintaining rail safety.

**North West Local Lands Services Comment to response.**

The North Local Lands Services has noted that 5.7.3 *Level Crossings* of the Response to Submissions Document refers to the possible closure of the Cains Crossing Rd.

Closure of the public road may impact the ability of walking stock to access a vital waterpoint and place the functionality of the TSR driftway at risk

**Requested Action:**

That ARTC continue to consult with NW LLS to provide stock access to the Spring Creek waterpoint.

Please contact myself if you require further information or clarification.

Yours sincerely,



**James Hutchinson-Smith**  
General Manager  
North West Local Land Services