



North West Protection Advocacy
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7th February

To: NSW Planning

ATT: Mick Fallon

OBJECTION Inland Rail - Narramine to Narrabri – Application Number SSI-9487

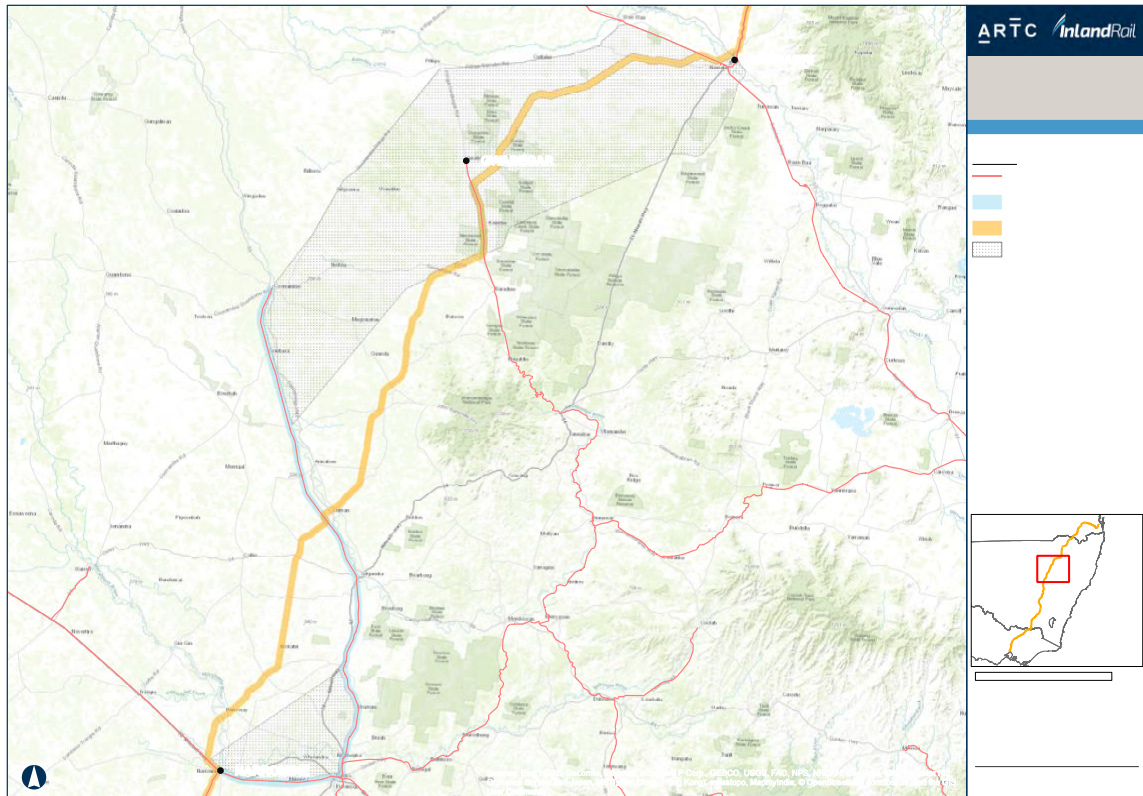
North West Protection Advocacy are a Coonabarabran-based grassroots advocacy group. We have a strong interest in ensuring that the Pilliga forest area is protected from inappropriate development. NWPA have been following the development of this particular section of the Inland Rail for several years. We object to the currently proposed route alignment that benefits the private good instead of the public good. It is inappropriate for the sensitive environment through which it is proposed it pass.

We share the opinion of Everal Compton that the idea of the Inland Rail has been bastardised beyond recognition and nowhere is that more apparent than in the proposal to put it through the incredibly culturally significant and biodiverse Pilliga East State Forest and then onwards across a flood plain. The proposed route quite literally cuts through the heart of the Pilliga and goes straight to the Leewood Waste Water Treatment Facility owned by Santos.

Everal Compton states here: <https://everaldcompton.com/2020/05/23/the-vision-of-the-inland-railway-is-now-a-tragedy/> THE VISION OF THE INLAND RAILWAY IS NOW A TRAGEDY.

The Pilliga is a significant carbon bank and importantly is the recharge zone for the Great Artesian Basin. To industrialize the Pilliga any further is pure folly. Pilliga is a living and breathing museum that has profound cultural importance to the Gomeroi.

The Inland Rail MUST NOT traverse the greenfield Pilliga East State Forest and instead be reverted back to its original proposed route from 2010 (as pictured) that continued through on the original line, turning eastwards before Gwabegar.



The change to the alignment was like a slap in the face to the majority of people in the region who oppose the coal seam gas industry in its entirety. See report by People for the Plains:

<https://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/6447/attachments/original/1583284899/Assessment of Social Acceptance of NGP.pdf?1583284899>

Many people believe the alignment was changed for the following reasons:

- **Conflict of Interest**

Ex-Minister for Industry Barnaby Joyce who owns land at Gwabegar might avoid what was seen as a potential conflict of interest as the previously proposed route (2010) went straight past the property he owns and despite his promises had failed to sell (Yarrandinbine).

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Diana Hallam was Minister Joyce's Chief of Staff in 2017, then she moved over to the Inland Rail Operations Unit. Shortly after this new appointment the route was changed to head through the Pilliga forest.

- **To directly benefit the gas industry (in particular Santos and the Narrabri Gas Project and their contractors)** one of these contractors is on the CCC for this section.

The gas sector has provided three of the directors for the Inland Rail, not counting John Anderson (Eastern Star Gas), who it seems has stepped back from a prominent role following delivery of his implementation report. These directors are Graeme Findlay, ex-BG Group and Origin; Rebecca Pickering, ex Origin (land access) and Neil Burlison, big player in energy sector, also ex-Origin and BP.

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- **To directly benefit Narrabri Shire Council**
Narrabri Council are pro-industrial development. They are outspoken supporters of the Narrabri Gas Project and with the development of the industrial Inland Rail Hub which will support heavy industry, coal and gas mining, fertilizer and explosives production and potentially LNG transport.

There are few perceived benefits of this route choice to farmers and many, many negatives. The route was changed to benefit Santos after this meeting (see images below) and is justified by saying “many local landholders have a strong preference for the corridor option through the Pilliga State Forest and then adjacent to the Newell Highway” but in all the documentation, minutes of CCCs and FOI’ed papers NWPA have been unable to see any proof of this statement. **Could the ARTC please provide evidence to back up this justification?**

12 May, 2017: Meeting in John Barilaro’s office

Mr Sal Petrocitto		
12/5/2017	The Hon John Barilaro MP Deputy Premier Minister for Regional NSW, Minister for Skills and Minister for Small Business Australian Rail Track Corporation John Holland Rail Narrabri Shire Council Santos	Roundtable discussion on intermodal Inland Rail
17/5/2017	Nathans Truck & Trailer Smash Repairs and Motor	Heavy Vehicle Safety

May 2017: New Greenfield study area through the Pilliga appears - The 2016 alignment no longer being considered⁴⁶

- Inland Rail preferred route now to pass through ecologically sensitive Pilliga forest and straight to Santos facility Narrabri.
- Limited cost saving (circa 5%) or time saving (circa 6 min) warrants route change – only mooted benefit is “avoids Farmers”.
- Rail corridor potentially can host gas pipeline which facilitates project.
- **NSW LNP Govt had to be involved in route change negotiations re State Forest impairments? Santos would have to had input due to potential impairments?**
- ARTC deny they had spoken to Santos in relation to re-alignment
- **If so then impairments would not have been budgeted for in assessment process?**

May 2017 – Inland Rail moves into “Phase 4”

May 2017: Darren Chester announces “...additional \$8.4 billion to build the Melbourne to Brisbane Inland Rail”⁴⁷

22 May 2017 – Albanese notes that Joyce appeared to have “seized control of this (Inland Rail) project from Darren Chester”⁴⁸

May 2017: DIRD release PWC study on the future of intermodal terminals⁴⁹

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ARTC were talking to Santos about the alignment (see image below from the Phase 1 Narromine to Narrabri Preferred Corridor Report: see Documents relating to the inland rail route from Narromine to Narrabri (FOI 18-058)
<https://www.infrastructure.gov.au/departments/ips/log.aspx>

- Option D intersects the proposed Santos Narrabri Gas Project adjacent to the Newell Highway. In discussions with Santos they have advised their preference for the rail alignment to be on the west of their proposed facility. The highway road corridor in the same vicinity narrows which reduces the ability for a rail alignment to go on the east of the proposed Santos plant footprint, within the road corridor. Discussions with Santos are ongoing in relation to the alignment and the progress of their proposed development.

ARTC claim that the preferred route has the support of landholders and stakeholders but the CCC was not convened until after the preferred route through the Pilliga was chosen. The CCC is stacked with representatives who are pro-gas, some of who could be seen to have a conflict of interest and have not declared pecuniary interest?

There is no transparency on who is in the Sponsors Group. FOI requests have returned multiple heavily redacted documents on this issue (see image below). Why is there secrecy around who is in this group? Can the ARTC detail who comprises this group?

Document 8



Biodiversity

Brendan Nerdal's (Infrastructure) communication to Richard Woods (Infrastructure) own internal communications show there are concerns about forest fragmentation and biodiversity with this route choice.

https://www.infrastructure.gov.au/department/ips/files/log/12_Redacted.pdf

Baradine to Narabri

17. As I've suggested in the letter, we should draw out that this Pilliga Forestry Route uses an existing transport corridor. I think this is an important point in relation to the forestry fragmentation/biodiversity questions.

s47B



We note that the studies conducted on biodiversity were made during a time of protracted drought but despite that the studies returned a large amount of recordings of native fauna.

NWPA are concerned that placing the rail track through habitat will increase the risk to native fauna from foxes which will be provided with what could be likened to a predator highway.

"Threatened fauna species

During the field surveys, 18 threatened fauna species listed as vulnerable under the BC Act were recorded within the proposal site. Of the 18 threatened fauna species recorded, four are also listed under the EPBC Act. The Koala (*Phascolarctos cinereus*), Corben's long-eared bat (*Nyctophilus corbeni*) and Superb parrot (*Polytelis swainsonii*) were positively identified during surveys. The Large-eared pied bat (*Chalinolobus dwyeri*) was also potentially identified based on Anabat analysis."

Koalas

The railway is going to go straight through the area known as "The Aloes" (pictured below) which has been noted for its koalas on the *Visit Narrabri* website:

"The Aloes is a lovely picnic area on the site of an historic homestead that contains several relics including early pioneers graves. It is one of a number of areas within the Pilliga Forest that has koala colonies, so keep your eyes peeled and you may be lucky enough to spot a few. Adjacent to the Aloes is a wide, sandy creek in which native trees abound."

<https://www.visitnarrabri.com.au/narrabri-directory/salt-caves-and-aloes/>



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The threats to the forest through cumulative impact, habitat loss, Aboriginal Cultural Heritage and non-Aboriginal Cultural Heritage is too great.

Cumulative impacts

Now that the Narrabri Gas Project has phased conditional approval NWPA believe that fresh environmental studies need to be conducted in order to assess cumulative impact effectively. What impact will the vibration of the train have on the Leewood Water Treatment Facility. What interaction will it have with this facility? Is the transportation of Liquefied Natural Gas proposed?

Not considered are the Narrabri Underground Coal Mine, Gorman North Coal Mine, Turrawan rail link, Narrabri Gas Project, Queensland Hunter Gas Pipeline (it is not yet proposed how this will link with Narrabri Gas Project). All of these projects are or will impact the Pilliga forest. Based on just the risks entailed by cumulative impact the rail through the Pilliga should not go ahead.

Sacred sites impacted

We have been informed by a Traditional Owner that the risks to culturally significant sites both known and unknown cannot be quantified.

AWC area

The development of this area has already had an impact on wildlife in the region because of the need to clear significant areas with hollow-bearing trees to create the enclosure needed to make the area operational. The project encroaches upon the sensitive Australian Wildlife Conservancy area.

Aboriginal Cultural Heritage Assessment

There is no mention of coal seam gas. Instead CSG mining is referred to as gas seam mining.

“The mineral industry in the bioregion has historically been based mainly on coal, as the region lies mostly within the Gunnedah Basin, which is a major coal-bearing sedimentary basin. Current mining titles are held for coal and some industrial minerals while exploration titles are held for coal, petroleum, gold, base metals, zeolites and clay minerals (Hartley 2000). The majority of coal produced in the region, although comprising a small yield, is for export to overseas markets(Hartley 2000). Gas seam exploration is currently awaiting approval in the Pilliga Forest.” Aboriginal Cultural Heritage Assessment Report- page 45

• *approximately 50per cent of all Aboriginal sites were recorded with alluvial landforms demonstrating a strong association with water features in all landform categories and with greater densities of artefacts in major creek systems.*
Aboriginal Cultural Heritage Assessment Report| 311

Cumulative impact on Aboriginal Cultural heritage too great with this route selection through the Pilliga East State Forest.

The Aboriginal Cultural Heritage Assessment Report states that:

Kirkwood CQCHM (2016) *An Aboriginal cultural heritage assessment was undertaken for the Narrabri Gas project in the Pilliga State Forest where Santos is seeking approval to drill up to 850 natural gas wells on approximately 425 sites over the 95,000 hectares project area (Kirkwood CQCHM 2016). CQCHM conducted literature and heritage database searches, reviews of previous studies including cultural values and oral history studies, discussions with the DPIE and Narrabri Land Council to obtain additional cultural heritage data, a data audit, and field surveys to validate existing data as well as Aboriginal consultation. Consultation with the Aboriginal community has been extensive and is ongoing with over 550 Aboriginal parties registering for the project including Native Title Claimant Groups, three Land Councils with the recording of 102 oral histories. The key findings of the cultural heritage impact assessment for the project were that:*

- there are 90 known Aboriginal cultural heritage sites including 16 site types within the Santos Project, yet the area **is likely to contain additional unidentified sites**
- the project verified the existence of 26 sites with **more to be verified over the course of the project** to be added to the project GIS

NARROMINE TO NARRABRI ENVIRONMENTAL IMPACT STATEMENT A5-1

NSW Planning must acknowledge that when this project is combined with the impact to the Pilliga of the Narrabri Gas Project that cumulative impact upon cultural heritage becomes too great.

Threatened Species/Ecological Communities

Mr Errington Environmental Advisor (ARTC) advised that the following six ecological communities were considered to be significantly impacted (both endangered and critically endangered):

- Coolibah -Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions –endangered
- Brigalow (Acacia harpophylla dominant and co-dominant) –endangered
- Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (Grey Box Woodlands) –endangered
- Natural grasslands on basalt and fine-textured alluvial plains of northern NSW and southern QLD –critically endangered
- Weeping Myall Woodlands –endangered
- White Box-Yellow Box-Blakely’s Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland) –critically endangered.

<https://1worpv3xudfc4dl40l1hi7fz-wpengine.netdna-ssl.com/wp-content/uploads/2020/07/n2n-ccc-meeting-minutes-narrabri-23-01-2019.pdf>

Risk Assessment

The Risk Assessment document details high risk to several areas of concern including but not limited to biodiversity, water/flooding, water/resources (extraction of groundwater), water quality, soils (erosion), non-aboriginal heritage, Aboriginal heritage, noise and vibration and visual amenity.

Operation		Severance of properties resulting in smaller lot sizes that may affect existing use and/or development potential.	Likely	Moderate	High
		Severance of properties resulting in changes to the arrangement of properties that may affect agricultural use and productive capacity.	Likely	Moderate	High
		Effects on access to and within properties as a result of changes to private access roads and internal access arrangements.	Possible	Moderate	Medium
		Land permanently required for the proposal affects the productive capacity of individual properties.	Possible	Major	High
zone (land).					
Biodiversity	Construction	Clearing of native vegetation (including vegetation in the Pilliga State forests) resulting in loss of fauna habitat, habitat fragmentation and loss of connectivity.	Almost certain	Moderate	High
		Direct impacts on listed threatened flora species and endangered terrestrial ecological populations and communities.	Almost certain	Moderate	High
		Impact on potential habitat for listed threatened fauna species.	Almost certain	Moderate	High
Operation		Potential for pollution of watercourses due to operation (freight materials, contaminants from train operation).	Rare	Moderate	Low
		Introduction of drainage infrastructure and culverts resulting in water quality impacts.	Likely	Moderate	High
		Impact to surface water quality and receiving environments due to increased runoff from increase in impervious surfaces.	Likely	Moderate	High
Aboriginal heritage	Construction	Potential impacts on registered Aboriginal heritage items/sites in the proposal site.	Possible	Major	High
		Impacts on unrecorded Aboriginal sites and/or areas of archaeological sensitivity or cultural value.	Possible	Major	High
		Impacts on areas predicted to have moderate to high archaeological potential.	Possible	Major	High
		Indirect impacts on registered Aboriginal sites outside the proposal site by the movement of vehicles and/or construction machinery.	Unlikely	Moderate	Low

Indigenous/Traditional Owner/Native Title representation on the CCC

NWPA have been unable to ascertain who these people are. Could the ARTC please detail?

Non-Aboriginal heritage

Several sites are projected to be severely impacted including the Aloes which is marked for its potential to be home to a koala colony.

Need to update:

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PDA-186%2120190301T042224.779%20GMT>

“Where the proposal site exits the Pilliga East State Forest it would pass through the project area for the proposed Santos Narrabri Gas Project and pass near to the proposed water treatment plant. This project is still subject to planning approvals with Santos currently preparing a submissions report following public exhibition of the EIS. ARTC has undertaken consultation with Santos (section 7) and will continue to do so to ensure any interactions with the proposal are managed.”

“The degree of impact from construction noise would depend on the relative exposure of sensitive receivers and the type and duration of construction activities in the area. However, as the proposal is linear, impacts on individual sensitive receivers during the construction phase would be for limited periods. Potential vibration impacts to the proposed Narrabri Gas Project water treatment plant at Bohena Creek would also require careful consideration.”

Conclusion

NWPA can only conclude after reviewing the available documentation that the choice of the ARTC to go greenfield through the Pilliga forest on new track is not in the public interest. It suits private enterprise over farmers turning what was thought to be a grain train into a coal/gas train.