

Inland Rail Submission

Inland Rail - Narromine to Narrabri

37 Station Road Otford

2508

23-09-2022

Dear Sir,

I would like to thank the Department of Planning, Industry and Environment for accepting public comment concerning the Inland Rail - Narromine to Narrabri.

I am concerned about the process, costs and route selection of the Inland Rail Project.

For costings ARTC advocates that the Australian Government is investing up to \$14.5 billion to develop and build Inland Rail and on Tuesday 15 March 2022 it was announced by Simon Birmingham that new modelling shows Inland Rail could cut freight transport costs by up to \$213 million a year, resulting in huge savings for businesses and industries that use the line. This implies it will take 68 years of operation for the Government spend to cover the benefits gained by businesses. Neither the Federal Government nor ARTC mentions the projected yearly return of the inland rail once completed.

The route selection and its ideology is driven by a city to city priority with minimal stops in between. The rail line has been oriented to avoid many of important towns along the way thereby not facilitating local freight travel by rail but in fact encouraging more trucks on the road. The current Scoping Report presents some direct evidence of this in Section 2.5 on Page 9 stating it avoids key population centres including Narromine, Gilgandra and Narrabri.

For regional localities that are bypassed this has and will continue to stifle competition maintaining high costs to market. This contradicts the relevant assertions made in the Scoping Report under sections 2.5 The Need for the Proposal and 2.7 Key Benefits of the Proposal.

Trains travelling on the inland rail would travel at speeds up to the ordinary speed of 115 km per hour that is available on the existing state systems. The opportunity for a more meaningful high-speed line has been lost to penny pinching. This has saved investment in the development of ground breaking high speed locomotives for freight movement and precluded the optimum utilisation of fast passenger trains. The NSW XPT introduced by the State Rail Authority in 1982 and now 40 years old have a maximum permissible speed of a top operating speed of 160 km/h (99 mph) and on the 6 September 1981 the XPT set a new Australian rail speed record of 183 km/h.

The Inland Rail proposal at this point exhibits a rail line to nowhere. There is no designated path into or out of either Brisbane or Melbourne. The centre section is being built but it doesn't reach its destinations.

Detailing this Project, the Inland Rail – Rail Narromine and Narrabri the greatest concern is the proposition of it forging the line right across the Pilliga East Forest. This is nothing short of an unacceptable bisection of the whole forest by a rail corridor 40m wide.

The route was selected to reduce community concerns about private agricultural lands. The claim that this represents a balance between community, economic and environmental costs reveal a marked imbalance. The route selected ignores the severe damage that would be inflicted on the Pilliga Forests and the loss of future options to improve biodiversity outcomes through the management of these forests as an integrated landscape.

Such a clearance has great impacts. It immediately opens the forest to loss of ground humidity levels and loss of coolness. Dehydration occurs along the whole corridor and its pathway is a welcome mat for weed infestation. Any suppression of weed infestation is carried out by the application of artificial herbicides. These compound the overspray and slow burning problem due to chemical spray drift which on the farms is a threat to food production, native vegetation including eucalypts and the farming community itself. Introduced herbicides and weedkillers used on a rail line are harmful to native insect populations.

The opening up of the canopy will increase the fire risk and reduced the capacity for carbon storage. The proposal has serious repercussions for the integrity, functioning and resilience of the entire Pilliga Forest which is an irreplaceable National Biodiversity Hotspot.

Introducing heavy rail and access tracks either side introduces soil compaction and increases water runoff and erosion.

The entirety of the Pilliga Forest, including the State Forests, is of exceptional environmental value. It sits within the Brigalow Belt South (BBS) Bioregion. Only 1% of the bioregion is currently protected in declared conservation reserves or subject to private conservation agreements. This is far below the IUCN target of declaring 17% of each nation's lands as Protected Areas, let alone the recent 30% target announced by the Commonwealth seeking to follow the IUCN 30 by 30 initiative. That is 30% of native vegetation cover by 2030.

Further exacerbating this situation is the continuing clearance of native vegetation in private land across the bioregion. The Brigalow Belt South is subject to some of the highest levels of land clearance on the continent, which has accelerated under a three-fold increase in clearance since changes to NSW legislation in 2016.

Consequently, opportunities to retain high quality native vegetation on private lands are fast disappearing in the BBS. The remaining vegetated public lands, notably the State Forests, are now the only viable option for achieving any form of sustained conservation outcome in the BBS.

Working from Table 6.1 in the scoping report the total area of native vegetation to be cleared with a 40m wide corridor along this route would be 7,497,120m² or 749.712 ha

$$\begin{aligned}\text{Area of Native Vegetation to be cleared} &= (161317 + 26111) \times 40 \\ &= 187428 \times 40 \\ &= 7,497,120\text{m}^2 \text{ or } 749.712 \text{ ha}\end{aligned}$$

This is a frightful amount of native vegetation loss which is unacceptable.

The Pilliga Forests is so significant it has been declared as a National Biodiversity Hotspot, one of only two in NSW and fifteen across Australia.

Rather than permitting further destruction of the Pilliga Forest, it is imperative that the State Forest be gazetted as Protected Areas under the *National Parks and Wildlife Act*. The only means of avoiding further species and ecological community extinctions within the BBS bioregion is to protect the Pilliga from logging and inappropriate developments such as the Inland Rail.

Detailing the flora further, concern has been raised by a botanist in the region over the inaccuracy of the EIs which references the following ecological community as commonly occurring between Narromine and Gilgandra.

PCT 88 Pilliga Box - White Cypress Pine - Buloke shrubby woodland in the Brigalow Belt South Bioregion.

Eucalyptus pilligaensis Narrow-leaved Grey Box is an uncommon tree around Narromine. It is referenced by the NSW herbarium as 'Locally frequent, in sclerophyll woodland on sandy or light loamy soils; north from Gilgandra.'). *Eucalyptus microcarpa* and *E. pilligaensis* are very similar trees with many overlapping identification characteristics. *E. microcarpa* is common South of Gilgandra through to Victoria.

Key differences relate to leaf size and colour plus flower and fruit characteristics (refer to NSW Flora).

No specimens having the distinctive characteristics of *E. pilligaensis* were seen near or along the EIS alignment.

Misidentification of the above species by the EIS will result in the incorrect PCT being selected. Ramifications include:

- Potential failure to recognize the occurrence of endangered ecological communities associated with *E. microcarpa*, ie Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-Eastern Australia (endangered) and Inland Grey Box Woodland in the Riverina, NSW South Western Slopes, Cobar Peneplain, Nandewar and Brigalow Belt South Bioregions (endangered).
- Potential failure to recognize derived grassland communities in close proximity to *E. microcarpa* as being derived grassland communities of the above mentioned EECs.

Further concerns include the following:

1. The EIS/BDAR/PIR has failed to identify EEC populations of Fuzzy Box on alluvial soils of the Darling Riverine Plains and Grey Box Grassy Woodlands located within Webb's Siding Reserve, Mitchell Hwy, Pinedeen Rd and the property 'Craigie Lee' construction footprint. These populations and any associated derived grasslands will be highly impacted by the project and must be included in the credit requirement calculations.
2. The vegetation mapping Webb's Siding Reserve is very coarse, labelling most ecosystems as PCT 248 - Mixed box eucalypt woodland on low sandy-loam. The local community are aware of a minimum of four distinct woodland communities within this 100 ha reserve, three are EEC communities including two MNES. Mapping of vegetation needs to meet BAM 2020 specifications to avoid significant and potentially irreversible harm to the local environment and MNES.

3. PIR Environmental baseline Map1 has a very large area categorised as “0 - Crop and/or Introduced grassland”. This mapping has failed to identify remnant derived grassland and woodlands communities associated with *E. microcarpa* within this generic labelling. Mapping of vegetation needs to meet BAM 2020 specifications to avoid significant and potentially irreversible harm to the local environment and MNES.
4. The BDAR states “1.1.3 Responding to submissions and proposed amendments. During the exhibition period, interested stakeholders and members of the community were able to review the EIS online or at display locations, participate in consultation and engagement activities,”

Compounding the 18 threatened flora species the desktop review identified a total of 58 threatened fauna species (38 birds, 15 mammals and five reptile species) as occurring in the area along with seven threatened freshwater fish species, one endangered population and one aquatic ecological community as having potential to occur within the study area. Cumulatively the protection of these species in their current decreasing numbers and loss of habitat dictates the reserve system of the Pilliga East Forrest should be protected

From a precautionary approach the best protection for the biodiversity would be to bypass the Pilliga East Forest. This means re routing the line from Narromine to pass either to the west or east of the Pilliga Forest. West of the Pilliga it would begin following at first the line from Curban to Coonamble and from there to Gilgooma, Benah, Belaba and then linking to the rail line from Burren Junction to Narrabri requiring just an upgrade. East of the Pilliga it could link to Gilgandra and from there to either Coonabarabran or Ulamambri and skirt east of the Pilliga Forest and link up with the north west rail line at Boggabri or Baan Baa. In doing so the Inland Rail project should consider allowing more linkages to significant towns along the way allowing for future regional freight movements and the transportation of goods for local freight operations. It would also provide a pathway for future use by passenger traffic with appropriate amplification of the corridor and great use of passing loops and sidings

Rather than permitting further destruction of the Pilliga Forest, it is imperative that the State Forest be gazetted as Protected Areas under the *National Parks and Wildlife Act*. The only means of avoiding further species and ecological community extinctions within the BBS bioregion is to protect the Pilliga from logging and inappropriate developments such as the Inland Rail. The environmental impacts associated with this project are so extreme as to be contrary to Australia’s obligations under the Convention for Biological Conservation.

There is further concern over the flood issue from this proposal. It appears to be the case that ARTC is skirting over the issues around the Castlereagh crossing. The plan cites the flood plain to be 4km at the IR crossing point. ARTC’s statement that their “detailed investigations and modelling” outdates the gazetted plan as presumptuous and inappropriate.

This raises the concern of a rushed approach with little regard for the coming impacts of climate change and increased rain events from adverse Indian dipole events and increased Monsoonal rainfalls. There is too much reliance on assertions and hype together with the ‘bulldozer’ of projects of State Significance over riding once again adequate planning. The cost benefits of this project are opaque and the rush to apply a minimal expenditure on the route is apparent.

Conclusion

This proposal suffers from a lack of consideration of the huge impacts of forging a line right across the Pilliga Forest which is so significant it has been declared as a National Biodiversity Hotspot, one of only two in NSW and fifteen across Australia. Forging a line across the Pilliga Forest will result in a frightful amount of native vegetation loss which is unacceptable. The pressures on this key location are already great and further bisection for a rail line which could go elsewhere is not desirable.

It needs to be realised that only 1% of the bioregion is currently protected in declared conservation reserves or subject to private conservation agreements which is far below the IUCN target of declaring 17% of each nation's lands as Protected Areas, let alone the recent 30% target announced by the Commonwealth seeking to follow the IUCN 30 by 30 initiative. Conservation of the forest is paramount.

The proposal gives the appearance of a rushed approach with minimal expenditure on the route and a resultant indifference and poor regard for biodiversity conservation and flood mitigation under the banner of State significant projects and lofty assertions. It is strongly recommended that the proposal be refused and pathways to the west or east of the Pilliga Forest be considered.

Ian Hill