Letter of Rejection

to the State Significant Infrastructure Application SSI_9406 Inland Rail – Illabo to Stockinbingal.

My name is David Carter. I live at 1272 Olympic Highway Illabo.

Although not directly affected by the proposed Illabo to Stockinbingal Railway Line I do live on the Main Southern Railway Line so I can understand what my fellow producers are going through with the construction of this new railway line.

As a concerned member of the community, I have been actively involved in all of the community meetings as well as being a member of the

- Illabo2Stockinginbal Community Consultative Committee.
- Chair, Illabo Branch NSW Farmers
- Group Captain, NSW Rural Fire Service
- Councillor, Junee Shire Council

Pg 1. Alignment map

They include the Cootamundra-Temora railway line – ok

But what about the Main Southern Line and the Stockinbingal-Forbes line??

It also does not include the rail bridge over the Billabong Creek at Illabo.

Pg 7 relocation of the crossing loop and associated Rail Maintenance Access Road improves emergency services access to the Bethungra Range.

I question this statement 'that the rail maintenance access road improves emergency services access to the Bethungra Range'

Yes; - the proposal provides a road that will act as a fire break that may slow a fire down as it approaches from the west. But the proposal is deficient in that:

- The driveability of this road during an emergency is questionable because
    - at every creek crossing we will encounter gates
    - At every rail crossing, public or private, we will encounter gates
    - The lack of gates actually along the access road will require us to 'cut' fences in order to get to the fire which will create a stock hazard to any approaching rail traffic
- Our legal right to drive this road without the necessary clearances/induction etc being obtained.

Pg 10. Land use and property

The permanent land requirements affect about 43 lots of land across 19 farms. The key potential impact on farming operations relates to farm severance.

Statement:

Legally you have to deal with 'Lots' as this is how properties are defined. However, it has to be understood that a 'lot' is not a paddock. In this context we need to know how many paddocks are going to be affected and how these effects will change the management of each individual farm. An example of this could be

- A farm has 20 paddocks, spread over 6 lots, after the line goes through 5 of these paddocks these are deemed unworkable and will need to be refenced into 3 paddocks in order to make this area usable. Who pays for this cost??
- A farm is manageable in its current configuration however this new line may require laneways to be built in order to sustain its efficiency and viability. Who pays?

affect internal access to tracks or roads within properties

– temporarily impact property due to rationalisation of access points, damage to roads, and inability to access key infrastructure during flood events

Chapter 1 Introduction

1.3.1 Location The proposal is a new rail corridor that would connect Illabo to Stockinbingal in NSW. The alignment branches out from the existing rail line north-east of Illabo and travels north to join the Stockinbingal–Parkes Line west of Stockinbingal. The proposal passes through agricultural and rural properties in the Riverina region of NSW and generally follows the existing cadastral boundaries and roads between the towns of Illabo and Stockinbingal.

Statement:

'generally follows the existing cadastral boundaries and roads between the towns of Illabo and Stockinbingal.'

This a very broad statement and basically false.

- Cadastral – meaning showing the extent and ownership of land.
    - At no time does this proposed new line follow any cadastral boundary rather it travels through the middle of properties
    - I would also question whether it goes anywhere near a cadastral 'lot' boundary
- Roads – meaning a wide path leading from one place to another
    - Except for a short section of line which travels beside the Dudauman Road it doesn't go anywhere near another road except to cross it.

Chapter 2 General biophysical and cultural environment

2.2.2 Description

The route would travel primarily through undeveloped land predominantly used for agriculture.

Undeveloped meaning – having a relatively low economic level of industrial production and standard of living.

Statement:

I really would like to question why the proponent has used this description and use of the word 'undeveloped' when in

17.5.3.1 Agriculture industry. The Riverina region is one of the most productive and agriculturally diverse areas in Australia, with 78% of the region's land mass comprised of arable agricultural land (44,600 km2) (ABARES, 2019).

The country in which this new line transverses is the same as described in the above statement by the proponent and is developed, highly productive and intensive in its agricultural production capability.

- All pastures are improved, established with lucerne, clover etc. This enables the producers to have a carrying capacity of up to 10 DSE's as against unimproved, or undeveloped as portrayed by the proponent, of 4 DSE's
- Crops grown on this land can yield up to 6 tons per ha.

This is equal to the carrying/yield capacity of the rest of Junee and Cootamundra-Gundagai LGA's, which are highly productive, and far from 'undeveloped, and are sort after areas, for potential buyers.

An example of this has been the purchased by Macquarie Bank of a parcel of land adjacent to a property that is affected by this proposed corridor.

CHAPTER 03 Statutory context

CHAPTER 04 Engagement

4.1.1 Overall approach and objectives

“ensure engagement activities meet the needs of the community and stakeholders”

At no time have the community been satisfied with the engagement delivered by Inland Rail personal.

- They have repeatedly not had any answers, except that is a matter between us and the stakeholders.
- The basic questions about crossings, fencing, access asked when the proposal was first floated have still not been answered, 4 years down the track.
- Noise disturbance/levels that will affect adjoining landowners are not even considered.

4.3.2 How the proposal has accommodated stakeholder feedback

The crossing loop and Rail Maintenance Access Road was changed from west side of the alignment at request of the Rural Fire Service (RFS) and Junee Shire Council to improve emergency fire access to the Bethungra ranges.

STATEMENT:

The request for the Access Road to be placed on the eastern side of the alignment is correct however for it to be used to improve access by emergency services to the Bethungra Range is not and I have already stated why this is not possible in an earlier statement.

To minimise operational impacts on landholders, stock underpasses were added where reasonable and practicable.

STATEMENT:

This is a very broad statement which I doubt satisfies the impacts that the affected producers will have once this project is completed.

CHAPTER 5 Strategic context and need

CHAPTER 6 Alternatives and proposal options

6.3.1 Selection of Illabo to Stockinbingal option in the 2010 Inland Rail Alignment Study

STATEMENT:

Whilst I can understand why Option B was preferred, I consider that the location of Option A in a different format should have been considered. This alternate Option would have run:

- From Junee folowered the Griffith line to near Old Junee then followed the Goldfields Way to the Combaning Road. This would have used existing track before
    - It followed beside these roadways with minimal impact on the various properties as this impact would have been along their boundary line adjacent to the roadway
- At the top of Combaning Road travel north till it hits the Temora-Stockinbingal Railway line then proceeding to Stockinbingal to link with the Forbes Line.

This route would be truer to the proponent's statement of following Cadastral boundaries and road reserves!

CHAPTER 07 Proposal description— operation

7.2.7 Road–rail interfaces

7.2.7.1 Public crossing

In table 7-3 Old Sydney Road, at Chainage 5592, has been proposed as an passive crossing.

Statement:

It is a requirement of the community and Junee Shire Council that all crossing within the Shire be ungraded to active. This particular crossing has been deemed by an ALCAM assessment to only warrant a Passive type crossing

This crossing is a new crossing and needs to be assessed for what it is.

- It is located on a dirt road in a tree lined road corridor
- It transverses the road on an angle +/- 45deg
- The location is susceptible to
    - Fog during winter
    - Dust during summer
    - Smoke during burn off of stubble paddocks
    - Dust from farming operations
    - Heavy vegetation cover along the road verge
    - Will have close access points for producers who will need access onto their properties for machinery, vehicles and livestock due to the failure of ARTC to provide them internal access. In the case of this crossing the boundary line for one producer is within 200 m of the crossing. This will result in a higher concentration of slow-moving vehicles over this particular crossing.
- Inland Rail are only indicating a 15m tared section each side of the crossing which would severely restrict the sighting of any vehicle stopped at the crossing due to any one of the situations described above.

I believe that Inland Rail have not

- highlight where specific risks or deficiencies exist
- quantify the expected consequences of a collision
- quantify the probability of a collision
- compare the relative risk between crossings within a region or jurisdiction
- model the effect of treatments to address these risks.

Although it is a comprehensive tool for the assessment of level crossing risks, ALCAM cannot be applied in isolation and does not preclude the need for sound engineering judgement and site specific risk assessment. Any risk assessment and treatment also needs to consider other factors, including but not limited to:

- *Collision and near-collision history*
- *Engineering experience (both rail and road)*
- *Local knowledge of driver or pedestrian behaviour*
- *Social and economic assessment*
- *Standards and international best practice*

It is also very important to ensure that all stakeholders associated with the particular level crossing are involved with the determination of the final recommended treatment.

Statement:

This last statement from the assessment tool has been ignored by IR in that we are being told what will happen, not asked and not taking into account local knowledge.

Also in Table 7-3 the other 2, proposed, Passive crossings at Chainage 11380 and 33773, need also upgrading for the same reasons as the other crossing identified above.

7.3.3 Signalling and communications

The existing signalling provisions at Stockinbingal and Illabo would be reconfigured to suit the new track and operational arrangements. The final locations and required changes to the signalling system along the existing rail lines would be determined in detailed design.

On opening, Train Order Working (TOW) would be used for operational train management between the junctions for Inland Rail I2S at Illabo and Stockinbingal. In the longer term, ARTC's Advanced Train Management System (ATMS) would be implemented to manage signalling and communications for the wider rail network. ATMS is a communication-based train management system, which communicates via both voice and data between network control centres and locomotives operating on ARTC's rail network. Connections for the aforementioned signalling infrastructure and communications to the electricity network, would also be installed via new connections to power lines where required along the proposal site.

Statement: it would seem, by the above, that ARTC are willing to have a black spot in this new green field site until they install the newer ATMS at a later date. Why are they leaving it so long to install their new system especially when a passing loop is built within the system.

It would also seem that they, ARTC, is ONLY CONCERNED by their own line and not about the safety of the private crossing that have to be installed so that property owners can gain access across the line within their properties.

In this new age of communication, it is important that the safety on these crossings is paramount for the users of these private crossings.

- Some of this line is very susceptible to heavy fog during the winter
- Crossing locations could also be susceptible to sun glare in the early morning/later afternoon
- Due to the intensive nature of farming operations these crossing could also be susceptible to
    - Dust from cropping operations
    - Smoke from stubble reduction operations

All of these situations could result in serious/fatal consequences to either the property owner/worker or train driver.

It is important that some sort of warning system be placed on these crossing to minimise this occurrence.

The use of radar operated warning lights (solar powered), or something similar, should be installed at these crossing as TofNSW have been doing at level crossing across the state.

The picture opposite is a warning slow down sign at a level crossing, just out of Illabo. It is solar powered and operates via a radar which activates when a vehicle approaches. This is new age, something that ARTC knows little about, technology which could be adapted for use at private crossings in order to make them safer.

<u>TECHNICAL PAPER 04 Hydrology and Flooding Impact Assessment</u>

7.2.4.1 Old Sydney Road It is noted that no changes to flood immunity are predicted for Old Sydney Road for the full range of flood events. However, road users travelling from the east to the west via the proposed level crossing will need to be warned of potential flood waters on the western site of the level crossing as there is unlikely to be visibility of flood waters on the road until the vehicle is crossing the top of the rail.

<u>6.5 Land uses</u>

The available aerial photographs and published land use maps have been used to inform the understanding land uses in and around the proposal site. The proposal traverses undeveloped rural areas used primarily for grazing and agriculture. The major industries in the area include livestock, wool and wheat. Most of the land within the proposal site has been cleared and disturbed for agricultural activities, however some patches of remnant vegetation remain.

Statement:

This paragraph and the subsequent paragraph's in this section are pure assumptions and totally mislead the land use patterns of this section of railway line. Again, the proponent is talking about 'undeveloped lands'. As I have already stated these lands are highly developed so that they can accommodate the high stocking levels that they do.

It also infers in the third paragraph that the land use is dominated by sheep when cattle are the dominant livestock in this part.

In the fourth paragraph it indicates that '*Water supply for the crops does not involve permanent irrigation infrastructure but is reliant on rainfall and supply from nearby above ground storages'*. There are no above ground storages to supplement any form of irrigation.

The statement that *'Overland flows are opportunistically captured by many farm dams which are the dominant water supply for the stock through the area*.' These overland flows are essential to the catchment of water for the supply of water for livestock, in all of the areas not just the central section. This rainfall is also essential for the supply of water to the numerous residences, caught in tanks as potable water and dams for use around gardens and firefighting, within the area as well.

No mention is made that the majority of the farms are also supplied with water from the Goldenfields Water supply scheme which supplements these farms will the supply of water for both domestic and livestock in a time of need, dry spells and drought.

6.6.2 Farm dams

A total of 137 farm dams have been identified within the catchments both upstream and downstream of the proposal, of which 14 are located in the proposal site. These farm dams are predominantly located on overland flow paths to opportunistically capture surface flows.

Statement:

Over the years dams have been placed in areas that are known to catch water and are therefore a reliable source of water. This water is essential for the supply of water for livestock production. Mention has been made of the 14 dams located within the corridor however it does not mention the number of dams adjacent, downhill side, of the railway line that could be severely affected by the change in water low from ill placed culverts that could send the supply of water for these dams in different directions which could place the viability of some paddocks, for livestock production, downstream of the proposed railway line in jeopardy.

These wider impacts need to be considered as part of the assessment of the application.

6.6.5 Wetlands

Statement:

No mention has been made of the wetlands located at the Bethungra Dam some 10k's east of the southern section and its water that runs into the Billabong Creek?

CHAPTER 08 Proposal description— construction

8.2.14 Timing and staging

It is noted that the majority of the works, sections 1-5, will occur Late 2024-Mid 2025, From Table 8-5, and section 6 late 24-Early 2026.

These construction works will occur through our, the districts, prime bush fire season which has its risks and obligations.

This Greenfields construction site comprises two (2) Rural Fire Zones.

- The southern sector, Junee Shire, is in the Riverina Zone controlled from Wagga and goes through the following brigade areas
    - Illabo
    - Bethungra
    - Dirnaseer
- The Northern sector, Cootamundra-Gundagai, is in the South-West Zone controlled from Harden and goes through the following brigade areas
    - Dudauman
    - Stockinbingal

Our Bush Fire Season runs from 1st Nov to 30th March each year. During this time no fires are permitted to be lit except by the issue of a permit.

It should also be noted this Greenfields construction zone is in prime rural area and is susceptible to fires.

- The southern sector had a major fire in January 1987. This fire burnt over 10,000 ha and took 4 days to bring under control
- Junee Shire has also had two other fires in 1990 and 2006 which burnt over 20,000 ha and again took over 4 days to bring it under control
- The Northern sector area had a major fire in late 2016.

Both of these sector fires impacted the area in which this new line is being built.

The rural community is very conscious of starting fires, especially during harvest which occurs from mid-November to early January. On days of High Fire Danger, we cease harvesting in order to minimum the risk of a fire starting from the operation of machinery in our paddocks. We also feel that any works issued under a 'hot work permit' should also be ceased.

Statement:

Nowhere in the EIS does it mention fire prevention. This section of the alignment is prone to fire and has a history of large fires. We as primary producers are conscious of starting any fire as a result of our farming operations. We feel that the construction crews should also follow our lead and

- Have adequate water, for firefighting, during construction operations
- Have water available, especially during the Summer, for assisting the rural fire service in putting out any fires within the area
- Cease the use of construction during periods of high fire danger periods when the matrix, as attached, is activated.

GRAIN HARVESTING AND FIRE SAFETY

September 2022

Is the wind speed too high for me to harvest right now?

1. Measure the current temperature, humidity and wind speed on your property. Average out the wind speed over 10 minutes and round down humidity readings.
2. Using your temperature and humidity readings, find the maximum recommended wind speed in the table. For example, a temperature of 40° and 15% humidity equals 21 km per hour.
3. If the wind speed you've recorded is equal to or greater than the wind speed in the table, it is recommended you do not harvest. Reassess weather conditions later.

Produced in partnership with the NSW Rural Fire Service, NSW Farmers and Australian Custom Harvesters

Current Relative Humidity

Current Temperature — FBI = 40	5%	10%	15%	20%	25%	30%	40%	50%	60%	65%
15°C	33	36	39	43	47	51	60	60	60	60
20°C	29	32	35	38	41	45	53	60	60	60
25°C	26	28	31	33	36	40	47	56	60	60
30°C	23	25	27	30	32	35	41	49	58	60
35°C	21	22	24	26	28	31	36	43	51	56
40°C	18	20	21	23	25	27	32	38	45	49
45°C	16	18	19	21	22	24	28	34	40	43

Average wind speed (kph) that equates to 40 Fire Behaviour Index (FBI)

Is the wind speed you recorded equal to or greater than the wind speed shown above?
If yes, it is recommended you do not harvest. Check weather conditions later.

NSW RURAL FIRE SERVICE | FIRE DANGER RATINGS – www.rfs.nsw.gov.au/fdr | LATEST WEATHER – www.bom.gov.au | BUSH FIRE INFORMATION LINE – 1800 679 737 | REPORT ALL FIRES TO TRIPLE ZERO – 000 | NSW

8.3 Construction compounds

Construction compounds are enclosed areas that are not open to the public and are used to support construction works in nearby areas. Construction compounds would generally accommodate offices, lunchrooms, toilet, first aid room, security, laydown area, stockpiles, bunded refuelling area, storage containers, mobile plant and equipment, and hazardous material storage. Where possible, noisy works and deliveries would be restricted to standard construction hours to minimise impacts on adjacent sensitive receivers.

Compounds

Based on table 8-6 I have reservations as to the location of a couple of these compounds and the water consumption from these areas

No 4 – Old Sydney Road

This compound will hold 180,000 litres of water which will be taken from the Bethungra Village Rural water supply. This pipeline also supplies the village of Illabo and the surrounding farming area with the supply of water for rural housing and livestock. It is also an essential source of water for firefighting purposes.

No 7 – Crown Road

This compound will hold 180,000 litres of water which will be taken from the Dirnaseer/Suttons Lane pipeline. It supplies water to the surrounding farming area with the supply of water for rural housing and livestock. It is also an essential source of water for firefighting purposes.

No 11 – Dirnaseer Road

This compound will hold 180,000 litres of water which will be taken from the Dirnaseer/Suttons Lane pipeline. It supplies water to the surrounding farming area with the supply of water for rural housing and livestock. It is also an essential source of water for firefighting purposes

No 18 – Old Cootamundra Road

This compound will hold 50,000 litres of water which will be taken from the Dirnaseer/Suttons Lane pipeline. It supplies water to the surrounding farming area with the supply of water for rural housing and livestock. It is also an essential source of water for firefighting purposes.

No 25 – Burley Griffin Way and Temora Street

This compound will hold 180,000 litres of water and will be supplied from the main village water supply

No 28 – 39250 m marker just north of Stockinbingal Village

This compound will hold 180,000 litres of water and will be supplied from the main village water supply

Statement:

We are concerned with the delivery of water, up to 410,000 litres, through the Dirnaseer/Suttons Lane water supply line. This line is supplied, by pumps, from the main village line which also is feeding the village, 180,000 litres of water for a batching plant at compound 25 and a further 180,000 litres for a workcamp at compound 28.

This will put enormous pressure on a supply line which at certain times of the year runs close to 100% capacity.

As per the attached letter farmers cannot obtain new access connections, even for domestic use, along the Dirnaseer/Suttons Lane water supply line how can Goldenfields Water be expected to supply water, up to 410,000 litres at any given time, for this project when they are saying the pipeline is already full. As stated earlier the major construction period is through the summer months of 2024/25. The summer period is the peak usage time for primary production let alone the addition of water being made available for construction.

Based on the analysis, section 8.5.4 Construction water supply, that they, Goldenfields Water, can supply 10-12 L/s at Cootamundra I doubt that this would happen at Compound 7 which is at the end of the line.

The summer of 2024-2025 could also be a period of drought which would put further pressure on the already full, as per letter from Goldenfields Water, water supply system.

See separate attachment from Goldenfields Water

Compound Locations, from pg 8-35

- located away from (or able to be managed in such a way so as to not significantly impact on) heritage items, native vegetation, watercourses, and areas prone to flooding (e.g. at least 50 m from watercourses and outside the 5% AEP flood zone) where little or no clearing would be required, and not within areas identified as threatened communities or species habitat
- located on relatively level ground of sufficient size to accommodate the required facilities

Compound 4 is located in a low-lying part of the paddock and could be subject to waterflows across the site as it could be deemed to be within 50m of a watercourse.

Compound 16 and 17.

These compounds are s located on the southern side of Old Cootamundra Road and as seen by the photo is on a downhill slope.

Compound 16 will be on the eastern side of the railway and will be very close to the dam, as shown.

Compound 17 will be on the western side of the railway and located on sloping ground in the middle of a watercourse will flows from the Compound 18 which is located on the Northern side of Old Cootamundra Road and on the western side of the railway line.

Statement:

I consider that the location of Compounds 16 and 17 dramatically fall outside of the proponents requirement of not being located 'on flat ground' and 'not being located near a watercourse'.

The proponent may classify a watercourse as being a creek type structure but in reality, The definition of a watercourse expressed in the National Water Act contains a statement that lacks specificity, viz. 'a **natural channel or depression in which water flows regularly or intermittently**'.

CHAPTER 09 Assessment approach and methodology

Deals with all aspects with regard to the earthly environment and nothing about the social environment. The effect on the environmental impact on farming is scantly covered in any of these documents but is more concerned about how it will affect water flows, which we know it will but no real answer as to how it can be tackled.

CHAPTER 10 Biodiversity

CHAPTER 11 Traffic, transport and access

11.3.1.3 Travelling stock reserves and livestock highways

Statement:

This study does not include the following roads that are used by 'locals' who use these roads to move livestock between properties, currently and more often, after this line is finished, by those producers who will be affected by the lack of suitable livestock crossing within their own properties.

These roads

- Ironbung Road
- Old Sydney Road
- Unnamed Crown Road
- Unnamed Council Road

These roads provide an important link between property owners who are not on the proposed railway line as well as those property owners who own property both sides, outside the corridor of the proposed line.

11.3.2 Traffic volumes

Statement:

I find it inconceivable, although not surprised, that again the proponent can't delivery real time data material for the roads affected by this project. They even bring Goldfields Way into the picture, and it has no bearing on this project at all, not even being used as a bypass route.

To think that these 'local' roads have a low traffic volume as perceived by the proponent is false as they don't take into account those property owners who use parts of these roads quiet regular for movement around/to other parts of their properties and for those owners who own land, outside the corridor, who may be travelling this route, parts of, many times a day.

"It is noted that background traffic volumes are likely influenced by agricultural land use in the area and may fluctuate due to the seasonal nature of farming activities, such as periods of harvest. This may result in periods of higher traffic volumes. The variation in traffic volumes between peak and off-peak harvesting seasons may be significant, however are regarded as insignificant as overall numbers are low compared to the maximum capacity of the road."

11.3.3 Traffic growth rate

Statement:

Why hasn't the proponent used the latest ABS figures from 2021 in this report and hasn't the area of Bethungra, used to gain this historic data for 2011 and 2016, changed between the two studies?

11.3.6 Public and active transport

Statement:

What has "*the Daily passenger and school bus services operate between Junee and Wagga Wagga traveling on Olympic Highway*" got to do with this study as it is outside the area. Why haven't they included the local School Bus Routes that service the local farming community and the Councils, Junee and Cootamundra-Gundagai, Community Transport Service that is available to residents within this area?

11.4 Impact assessment—construction

Statement:

In the 3rd paragraph it mentions "*The construction routes would extend from surrounding population centres, including Temora, Cootamundra and Wagga Wagga"* why hasn't Junee been mentioned?

The other part of "these desktop studies" is the mention of Access Routes, Figure 11.4, saying that the movement from

- Wagga -Junee-Illabo would be via the Olympic Highway whereas any trucking company would know that there is a Heavy Vehicle by-pass of Junee via Old Junee
- Has this team taken into account the Albury to Illabo section of the project and the fact that the Kemp Street Bridge in Junee will be replaced, over a 10mth period, and that all the extra traffic will be using the central railway crossing in Junee. Even to the extent that the highway intersection will be closed for 2 mths and all traffic, including heavy vehicles, will have to use local streets?
- The use of Junee Reefs Rd-Retreat Rd-Dirnaseer Rd would be unsuitable due to the type of road, that these trucks will be using.
- The Goldfields Way- Junee Reefs Road intersection is unsuitable for this proposed amount of traffic due to poor sight distances especially turning South towards Wagga. If they looked at road train applications for this intersection, they would have seen that it is only possible to turn off Goldfields Way and not onto it.
- The use of Blackgate Rd also falls into the same category as the last one. Namely narrow width, tight corners and light pavement structure.

11.4.1 Traffic and road network impacts

Statement:

Based on your figures from Table 11.2 it would seem that the impacts, of your construction, are going to be considerable and I would doubt that any degree of rehabilitation before construction commences, by Council, will save the local road network from considerable damage these vehicles, both heavy and light, movements will have. These vehicle movements could be up to 300% over and above the regular movements. Even though the proponent is saying that they will use their internal access road to bear the brunt of this traffic most of the traffic has to start from a local road before it

hits this internal road and also it dosen't state anywhere the type of road being constructed one-way only or two-way?

11.6.5 Managing residual impacts

Statement:

Table 11-11 only seems to recognise the words Likely, Possible and Almost Certain which are all 'Maybe' words instead of using the word 'Certain' which will happen in any construction?

CHAPTER 12 Hydrology and flooding

12.3.6 Farm dams

Statement:

Of the 137 dams identified how many are located within 1k downhill of the proposed line. These dams could be adversely affected by this proposed line due to the effect that this line will have on the natural drainage lines across paddocks.

12.3.7 Stormwater infrastructure

Statement:

The proponent indicates that stormwater is non-existent due to it being agricultural land. In fact, stormwater exists on all lands. Stormwater follows drainage lines across paddocks be it in defined channels or in this case open paddocks. These drainage lines help to fill farm dams which have been setup along these drainage lines which will be affected by the proposed railway line.

Before Chainage 13400 there is a concern that the overland water flow will be channelled into the crown land road reserve which will be needed as a road reserve as an access from the corridor to Ironbung Road. This will impact on this facility. This is indicated in Table 12-9 at chainage 13100.

As per Table 12-9 the information indicates that all, as a direct result of the proposed railway line, drainage locations will have an increase in flow which will have a direct, negative, impact on agricultural production.

12.5.7 Social and economic impacts

The proposal is not anticipated to result in significant social and economic impacts from flooding. Where exceedances of QDLs are predicted, these generally occur within the rail corridor, or as minor impacts in the surrounding area.

Statements:

These so-called minor impacts will result in changes to agricultural production with increased wet areas resulting in loss of production and lower than normal dam levels due to changes in water flows across paddocks.

The next *paragraph "Existing farm contour banks have been identified and the assessment indicates that only one contour bank would be impacted by the proposal. The proposal has been designed to maintain all but one overland flow path, which will therefore minimise the impact to farm dam flows*" is very misleading as it indicates that only one dam will be impacted whereas in reality may will.

12.5.1.3 Potential impacts during extreme flood events

} Billabong Creek—overtopping of the rail occurs for about 1.6 km, with depths varying from 0.1 m at the extents of the floodplain to depths of up to 2.5 m in the immediate western overbank of Billabong Creek. The proposal, the existing Main South Line, and Olympic Highway act as a significant barrier to flood flows during extreme events. There are no residential properties downstream of the proposal at this location. It is also noted, during the 1% AEP, a section about 400 m in length is overtopped by depths in the order of 0.2 m.

Statement:

It seems that the proponent is willing to sacrifice the safety of the railway line and those travellers on the Olympic Highway by building a line in a flood prone area that has the potential to wash away.

- Powder Horn Creek—overtopping of the rail occurs for about 230 m on the eastern side of the main channel with overtopping depths in the order of a maximum of 0.1 m. The proposal is a barrier to flood flow, with water levels up to 2 m higher upstream of the proposal. The nearest residential house is 700 m downstream of the proposal and no impact from overtopping was considered likely at this location.

Statement:

There may not be an impact on the house immediately downstream however if this barrier, the railway line, gave way as a result to flooding then the residence would certainly be in danger. I would have

CHAPTER 13 Water quality

13.3.2 Farm dams

There are 14 farm dams located within the proposal site and a number of farm dams located within the study area as shown in Figure 13-2. These dams intercept overland flow and may be used as water supply for stock throughout the area.

Statement:

The desktop study again 'thinks' that the farm dam 'may' be used as water for livestock. Typically, these dams are used for livestock. Farmers have no other use for dams except in conjunction for firefighting purposes and the supply of water for gardens around hoses on a property.

CHAPTER 14 Groundwater

CHAPTER 15 Cultural heritage

CHAPTER 16 Noise and vibration

CHAPTER 17 Social and economic

17.3.5 Risks identified

Statement:

Of all the things I have read in this document the risks identified in this section are the only thing that the proponent has said that is true.

Then they go back to the trick of doing things that make you feel good, which dosen't, in 17.3.6 How potential impacts have been avoided or minimised.

17.4.1.2 Land use

Chapter 18: Land use and property and Technical Paper 11 identified that most of the local study area has been extensively cleared and is predominantly used for agriculture. Cropping activities are focused on annual crops, with sheep and cattle accounting for the majority of grazing activities. There is minimal residential development located within 1 km of the proposal site for most of the alignment, except for the township of Stockinbingal near the northern extent

Statement:

The above statement infers that "minimal residential development located within 1 km of the proposed site". In fact, of the nine (9) properties impacted in the Junee Shire, southern section, there are eight (8) houses within the corridor and a further five (5) houses adjacent to the corridor but within the 1 km distance. I can't comment on the northern section however once the line hits Stockinginbal the percentage will change again away from the minimum as proposed by the proponent.

17.4.1.4 Overview of towns in the local study area

Illabo is a small rural township located on the Olympic Highway between Junee and Cootamundra. It had a population of 59 at the 2016 census. The township exhibits a very dispersed settlement pattern of semi-rural residential and agricultural service facilities such as silos, and there is no commercial centre.

Statement:

Illabo's does have a commercial centre which consists of a hotel, with four (4) rooms plus a Post Office, two (2) churches, two (2) grain silo complexes along with a trucking business and a war memorial.

17.4.2.3 Events and activities

This refers to Appendix A of Technical paper 11

TECHNICAL REPORT 11 Social Impact Assessment

6.4.1.2 Emergency services

No mention is made of the Rural Fire Service, as an emergency service. This railway line transverses five (5) Rural Fife Brigade areas. The VRA is also located in regional towns as well and is also classified as an emergency service.

Appendix A Events by town

Bethungra is not listed in this section. It holds a very successful ANZAC Dawn service every year along with 3-4 community BBQ's every year

Illabo also stages a Campcraft in September and a Melodrama in May along with a Christmas gathering in December.

CHAPTER 18 Land use and property

18.3.3.5 Agricultural access and movements

Figure 18.4 pg 1

Gives the property owner, chainage 2000 – 5500, a livestock access only and ALL machinery/vehicle access will have to be via a public level crossing.

Figure 18.4 pg 2

Gives the property owner, chainage 5500-7000, the same result as the previous owner except they will have a thin strip of land, to the west of the line, which is really unserviceable. This makes a mockery of the proponents opening statement of 'following cadastral boundaries'

The owner of the next section, chainage 7000-8000, is in a similar situation with only a stock crossing however how do they access southwest corner of their property when it is across a creek which could be unsuitable for heavy machinery access, especially when it has water in it. This part of their property is severely impacted by this lack of access.

The northern section (3), chainage 8500-11500, is also very restrictive for machinery access as the only access point is via a public crossing at the northern extreme of the property with their machinery sheds etc near the 9000-chainage mark

The property owner at Chainage 8000-8500 also losses access to the northern side of their property when the Ironbung Creek has water in it. There only access then is also by this public crossing, chainage 11500, and then by an unformed crown road. They may also have to use this crossing for livestock.

Figure 18.4 pg 3

The next owner, chainage 11500-14000, does finally have a private level crossing and now 2 stock underpasses, however with this property being sold to inland rail I'm wondering if they will keep to their undertakings and supply these important access points.

The next owner, chainage 14000-18500, is probably one of the worst affected owners with 4.5 km of railway traversing their property. There only access is by 1 livestock underpass and the level crossing, on a unnamed public road. IR have indicated that they will make creek/road bridges wider in order to allow the movement of livestock/machinery under these structures however, nowhere inn these documents have I found reference to this. They have an ideal opportunity to do this at the Dirnaseer Road Bridge and the Run Boundary Creek Bridge. This would make the property more serviceable than the proposal indicated by the proponent

Figure 18.4 pg 4

This owner, chainage 18500-22000, does at least give some consideration to the owner in the management of their property. Due to the nature of the terrain the crossings as indicated are

warranted however as per IR proposal to give access under bridges no access appears to be provided at the Dirnaseer Road Bridge.

The owner, chainage 22000-23000, only access is by a level crossing at the end of Dudauman Road, which needs upgrading in order to make the new entrance serviceable however this access is the only spot for livestock which is difficult when attached to a level crossing.

Figure 18.4 pg 5

The owner, chainage 23000-26500, again appears to have adequate serviceability but all this would depend on how livestock and machinery movements are currently treated within the property.

The owner, chainage 26500-28000, has no machinery/vehicle access except via a public road, Old Cootamundra Road, which will need the owner to provide escorts in order to move wide machinery. IR have the ability to provide this type of access under the proposed rail bridge over Old Cootamundra Road but as discussed early this site is not level and in a watercourse zone and would therefore be unsuitable for this type of access.

The owner, chainage 28000-30000, is being hindered with not being allowed access out there 'back gate'. Back Gates are sometimes an important tool for many producers as it will save them many minutes in getting produce etc off the farm. In this case this gate is needed for access to the back portion of this farm during wet winters due to the location of wet gullies across the farm. The other problem with this property is the sliver of land that will be left over between the proposed railway line and Dudauman Road.

Figure 18.4 pg 5 and 6

The next owner chainage 28000-34000, on the eastern side and chainage 30000-34000. Even though the maps show this particular group of properties being in different ownership they are in fact owned by members of the same business. This business has been trying to negotiate with IR on possible access arrangements that suit their existing laneways. They also have a thin strip, sliver, of land between the proposed railway line and Dudauman Road which will be very hard to crop, hard to manage livestock wise especially if it hasn't any water supply but could be useful as a laneway for the movement of livestock and machinery.

Figure 18.4 pg 6

The next owner chainage 24000-35000 and 36500-37500, northern boundary on the edge of Stockinbingal. This owner gets no private crossings at all and is expected to use the public crossing, on Corby's lane, for all of his movements across to his block on the eastern side of Dudauman Road. They also have a sliver of land between the proposed railway line and Dudauman Road which is basically unusable. There block of land on the northern boundary is again isolated and they are expected to use a 'paper road' which again is unsuitable.

The owner of chainage 35000-36500 is given a private crossing on their southern boundary however when you look at the water/creek drawings he has no access to that part of their property over the creek.

In both of these cases you would think some sort of land swap could have been arranged, but again the proponent doesn't seem willing or interested.

Figure 18.4 pg 7

The owner of the last section, chainage 38000-40500, already has a railway line through their property and you would expect that the slight adjustment for the new corridor should not place any more restrictions on their farming operations.

18.3.6 Biosecurity and 18.3.6.1 Weeds

Several methods were used to determine historical, current and potential biosecurity impacts of the study area, including:

- A desktop review of publicly available information relevant to biosecurity risks, including The Riverina Regional Strategic Weed Management Plan 2017-2022 (NSW LLS, 2017) and the Riverina Regional Strategic Pest Animal Management Plan 2018-2023 (NSW LLS, 2018)
- A review of ARTC-led consultation with landowners and other stakeholders
- A consideration of the potential for impacts on property during construction and operation

Statement:

If the proponent was really concerned about biosecurity, then they wouldn't be doing desktop studies and they would be listening to producers and not reviewing consultations.

Biosecurity is current and future. Farmers are concerned about the spread of footrot, lice, OJD and other diseases including the potential for Foot and Mouth and Lumpy Skin plus others that may arise. Any shared access by producers has the potential for any of these situations to affect the profitability of those producers. Having internal crossing points eliminates this possibility. This also applies to weeds, and not just those that appear in the Strategic Weed Management Plan but those that are of a local concern as well.

All of these points would have been conveyed to the ARTC team at many opportunities but ignored as per all the other requests that have been made.

18.5.2.2 Impacts on farm infrastructure and farming operations

The potential issues and impacts described in section 18.4.2.2 would continue to be relevant during operation for those properties affected by the proposal's permanent land requirements. Property severance has the potential to result in ongoing additional time and costs in moving livestock and machinery between severed parcels of land, making farm operations less efficient and practical. Additional capital investment could be required to replace current infrastructure in some locations. Property severance may also reduce the land capability and viability of some parcels of land as a result of reduced or impractical sizing of paddock parcels, requiring conversion to a lower yield of agricultural production, or even discontinuation of use of some parcels of land. This would require additional capital investment for any conversion activities and could affect the profitability of some farm holdings. The impact of severance on farming operations is highly dependent on the circumstances of each farming business. Relevant factors include the nature of farming enterprise, the capacity of severed land to be accessed from on-farm operational hubs and the capacity of the enterprise to adapt to the changed operational circumstances. Measures to address severance impacts, including, but not limited to, amalgamation opportunities, would need to be considered on a property-by-property basis as part of the land acquisition process, consistent with Division 4 of Part 3 of the LA Act. Fragmentation has been assessed at a farm scale, i.e. portions of a farm are separated by the rail corridor. The process reduces the size of the farm as well as potentially creating small areas fragmented from the remaining balance of the farm, which may be difficult to access and use. Lots severed within the farm boundary are generally narrow along the rail corridor, ranging in size from 2.2 to 26 ha. Areas less than 30 ha may present management difficulties, and the impact of

the severance of small areas can impact viability, as it may not be practical to continue operating small, fragmented areas as part of the original agricultural business. It is considered unlikely that the decline in productivity due to fragmentation or severance into large areas will cause the loss of viability of the larger surrounding properties. As the severed lots form part of a larger farm area, the decline in productivity due to fragmentation is reduced at this scale. It is unlikely that the impact of the proposal will cause the loss of viability of the smallest affected property holdings because they are unlikely to sustain full-time employment for operators due to their small size. Permanent alterations to access arrangements may increase time and cost for the movement of agricultural machinery and livestock. Potential access impacts are considered in section 18.4.2.2. The provision of private accommodation level crossings and stock underpasses for connectivity will be determined during detailed design. The movement of trains along the new rail line, together with changes to access arrangements across the rail line, has the potential to affect movement patterns for farm machinery and livestock that need to cross the rail corridor. Affected agricultural landholders may need to consider train movement patterns to assist with safe scheduling of routine agricultural activities

Statement:

Anyone can make a statement that states the potential for ***"Impacts on Farm Infrastructure and Farming Operations"*** are minimal. This is what the proponent has done.

In reality this won't be the case. Each property will be affected in diverse ways. Some will, as the proponent has stated have minimal impact however on reflection of the properties suffering impact around 95% of those properties will suffer

- severe management problems.
- production losses due to paddock realignment
- production reorganisation with trying to maximise productivity
- re-establish laneways, yards, silos, paddocks and watering points

These will take years to perfect, and it seems that no real compensation is going to cover these issues.

<u>From CHAPTER 27 Approach to environmental management and mitigation</u>

General Statement

This is a various ambitious Chapter that identifies active risks and a lot of risks far outside the scope of the Greenfield site. In saying this it does not give any solutions to migrating any of the risks except by saying it will be fixed in the next document. The question being this is the document that needs approving in order for the next stage to go ahead. We don't get a say in any further documents. The only say we have is in this one, but we aren't getting a chance to.

In the next few statements are some of the issues that concern me and with possible solutions.

LP-5

Impacts of construction on private properties

Feasible and reasonable property-specific measures would be identified during detailed design in consultation with landholders. These would be implemented during construction where construction is located on or immediately adjacent to private properties and has the potential to affect farm operational arrangements. The measures would include, as appropriate:

- arrangements in terms of works timing and practices
- any required adjustments to fencing
- access, and farm infrastructure
- relocation of any impacted structures

Statement:

At what level will Inland Rail consider what are 'Feasible and Reasonable property-specific measures' when they don't listen now to our needs re fencing and access. IR need to accept an industry practice from a joint collective of producers who know what "FEASIBLE" means

Mitigation measure LP-8

Impacts on livestock

Stock fencing must be in accordance with the Inland Rail fencing standards and be constructed prior to the removal of existing fencing or any works being carried out on the subject land, unless otherwise agreed with the landowner. Where fencing is required, the relevant landowner will select the type of fencing in a like-for-like fashion from ARTC's standard fence and gate types, to suit the farm operations. Internal fencing matters will be considered, as appropriate, during the land acquisition process.

Statement:

Farmers have been constantly rejecting Inland Rail's fencing standards as they are inadequate for farming operations. At no time have they acceptable our basic requirement for a 8/90/30 boundary fence configuration, which is industry standard.

LP-9 -- Minimising impacts on routes used for stock movement

Local Land Services (LLS) would be consulted during detailed design to understand how impacts on routes used for stock movement can be minimised and managed during construction and operation. Alternative access arrangements would be made, as required, subject to maintaining rail safety.

Statement:

HS-3 --- Bushfire

Detailed design and construction planning would maintain appropriate access during construction and operation, ensuring local roads allow emergency access, first-response firefighting, access to water supply for firefighting purposes and safe evacuation routes.

Statement:

This is an EIS in which I would consider that this would be known. As already mentioned the proponents time schedule coincides with our districts prime bush fire period. Below in part is the minimum standards that we would require in any bush fire plan

General – over the summer bush fire period – 1st November to 31st March

- Have an adequate movable water supply on hand at each construction site.
    - Minimum of 2,000 litres of water
    - Vehicles equipped with UHF radios, contact lists for the following personal
        - He location/position of the appliance for the emergency call to 000
        - Brigade Captains
        - Landholders

High – Bush Fire Rating 20-49

- consider what type of activity they are doing during this High Danger period
- As the index approaches 40 cease all heavy vehicle construction in line with the agricultural requirement to 'Cease harvest' during times when the Fire Index Matrix exceeds 40

Extreme – Bush Fire Rating 50-60

- Cease all types of work along the construction zone

Catastrophic – Bush Fire Rating above 60

- Basically, take a holiday till conditions abate.

HS-4 -- Flood and emergency response

A flood and emergency response plan would be prepared and implemented as part of the CEMP. The plan would include measures, processes and responsibilities to minimise the potential impacts of construction activities on flood behaviour and bushfire risk as far as practicable. It would also outline measures to manage emergency responses during construction

Statement:

This plan should already be prepared.

In summary

I have been following this proposal for years and it would seem, to me and lately others, Inland Rail have had only one objective in mind, which is to build a Railway Line from Melbourne to Brisbane at whatever cost with no regard to the damage its going to do to the social, personal, environment in the process. This has been particular evident in the management of the Illabo2Stockinginbal Greenfield section. As soon as it became evident that the line was going to be diverted through this area, we have been asking several basic questions. These are

What sort of compensation will be available	It took nearly 3 years before we were told that it would be under the NSW Act
What sort of access will the affected producers have	The only basic answer has been. There are 3 possibilities 1. Underpass 2. Level Crossing 3. Overpass
Livestock	At no stage have they given us any type of design. The only information given has been that designs will be worked out between IR and the effected producer.
Machinery	As per previous
What sort of fencing	Again, no definite answer except that the type will be decided in consultation with the producer. They have even tried to reinvent the wheel by designing their own fencing standard which has been unsuitable.
Hydrology	Still no clear understanding off how it going to affect water runoff.
Biosecurity	No understanding of the issues

The majority of the issues facing these producers, and indeed producers in the other Greenfield sections, could have been fixed if ARTC had only answered these simple questions. They didn't have to do it in detail but just an idea, pictures/drawings, in principle with the finer detail to be worked on in time.

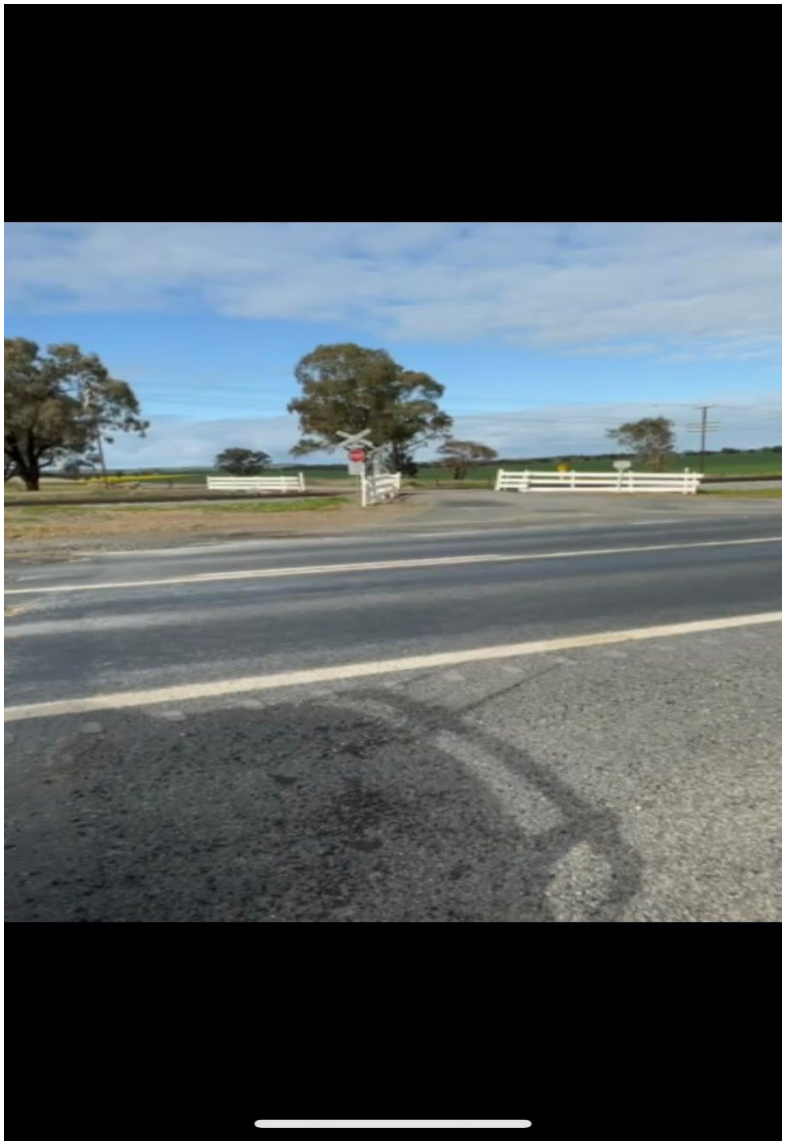
The Department of Primary Industries has designs that could be used. Transport of NSW must have plans when they are building freeways across country NSW, like the Hume or Pacific Highway's.

See Annexe 'A' Stock Crossings Designs.

- In any Stock Underpass its essential that they have a firm base, cement/road base material, holding yards each side of the railway line.

Private level crossings also need to have some structure about them as well. This includes

- Be wide enough to accommodate heavy machinery. Most machinery, in width, are generally around 5m. The crossing width needs to be around 8m wide in order to provide enough safety margins whilst crossing.
- The approaches need to be flat for at least 20m.
- The crossing along with the associated roadways must be HML rated



- ARTC are talking, in documentation, about these crossing being gated, for livestock security. These gates need to be replaced with cattle grids, which serve the same purpose. These grids serve the same purpose but are a lot more user friendly.

Opposite is a picture of a ‘open’ level crossing which is serviced by cattle grids.

One would have thought that an EIS would have been full of detail on these and other issues. The other issues, flora and fauna etc, are covered. Our issues are not. The answer always comes back to we will talk about it later, in the design phase.

How can you have an EIS if you don’t have a design. It’s like building a building a house, imagine this picture this is how it will look. No Development Application, to Council, would ever be passed with that concept.

We are expected to except this, it’s not on.

Basic things like are not even understood let alone considered.

- Understanding local traffic patterns
- Realising that school buses are a part of this road network
- Understanding the regions fire risk
- Caring for the social fabric, mental health etc, of the producers

- Understanding how a mixed farming enterprise works and that it is not a one size fits all.
- Each producer is their own self, and they need to be treated that way

My understanding of the meaning of the words used in the EIS

Environmental –

- relating to the natural world and the impact of human activity on its condition
- aiming or designed to promote the protection of the natural world
- relating to the arising from a person's surrounding
- relating to the environment in which people, animals and plants live

Impact

- The action of one object coming forcibly into contact with another
- A marked effect or influence
- Have a strong effect on someone or something

Statement

- A definite or clear expression of something in speech or writing

In Conclusion

I believe that this EIS goes nowhere near my understanding of what an EIS should be. It has missed the key issues of

- The impact of human activity on its condition
- The action of one object coming forcibly into contact with another and
- A definite or clear expression of something in speech or writing

These 3 issues are the core of the matter. ARTC have failed to

- Understand the needs of the farming community and the surrounding community
- How it will affect the community in the short term and over the next 20 years and
- Solutions to solving these problems.

I feel that ARTC need to re-consider access into the Bethungra Hills for emergency services with the basic addition of road extension/upgrade of the un-named crown road, local at chainage 11250 and the un-named council road located at chainage 16000.

I feel that ARTC need to go back to the drawing board and revisit these basic principles of communication and understanding before this EIS is approved as at the moment it has too many holes, so to speak, in it.

Thank you for your time

Regards

David Carter
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Department of Primary Industries
primefact

Underpasses for moving livestock under expressways

February 2009, Primefact 823, First edition

Geoff Casburn, Livestock Officer (Sheep and Wool), Wagga

Brian Cumming Livestock Officer (Beef Products), Albury

Introduction

This Primefact discusses aspects of the design of livestock underpasses under expressways. It incorporates livestock behaviour and the safety of the handler as the key areas in their design.

Livestock crossings under expressways and motorways use either a boxed culvert tunnel or a fenced laneway running above the normal water line under an existing bridge or causeway.

While the following guidelines refer to the boxed culvert type of crossing, some may be relevant for fenced laneways under bridges.

Boxed culvert tunnels may be long, ranging from thirty to sixty metres in length. Existing tunnels are often equal in height and width with sides ranging from three to four metres. The tunnels may have a dual purpose by also acting as an additional culvert to allow water to pass under the road in times of flood. The tunnels are lit by natural sunlight from each end of the tunnel, sometimes in combination with one or more skylights, usually in the middle of the tunnel. The skylights in some existing tunnels also act as drains, allowing water to drain out of the median strip between the two carriageways above.

These guidelines have been developed using personal experiences of the authors, information on the behaviour and movement of livestock through conventional handling systems and information gathered as a result of inspecting ten existing underpasses (under-carriage crossings).

New boxed culvert tunnel under construction

They are relevant to the construction of under-carriage tunnels for the movement of domestic livestock, principally cattle, sheep, horses and goats. They do not refer to the movement of native fauna.

The design of the tunnel and livestock handling yards need to take into consideration livestock movement, vehicle movement and occupational health and safety of people using the tunnel.

Principles of design and livestock handling

Livestock have evolved as prey animals, and feel most safe when in large mobs in familiar surroundings. They prefer to see a wide distance in all directions and to have surrounds that enable them to move freely away from predators