



Local Land Services North West

2 February 2021

Major Projects
Department of Planning, Industry and Environment

Submission via Major Projects Planning Portal:
<https://www.planningportal.nsw.gov.au/major-projects/project/10211>

Attention: Mick Fallon – Planner, NSW DPIE

Dear Sir,

RE: North West Local Land Services Comments on State Significant Infrastructure Project: Inland Rail – Narromine to Narrabri (Application No. SSI-9487)

Thank you for the opportunity to comment.

North West Local Land Services (NWLLS) has assessed the EIS in relation to the potential impacts on Travelling Stock Reserves (TSR) which NWLLS manage under the NSW Local Land Services Act 2013, and how general biosecurity duty obligations under the NSW Biosecurity Act 2015 for the rail corridor land have been addressed by the proponent.

Key Issues

1. Rail corridor alignment through TSR R27999 (Arrow TSR)

- The rail corridor alignment is proposed to traverse Folios 6/1195493 and 7/1195493 immediately north of Narrabri. These Lots are a key component of TSR R27999 which facilitates the important movement of walking livestock within the region.
- R27999 forms a major junction and connection point for walking stock at the regional level, and as a result, the loss of the ability to move stock along these Lots will have a major adverse impact on the functionality TSR network.
- The current proposal is for ARTC to align the corridor to the south-eastern side of the Lots which will create an approximate 40m wide and 700m long corridor for livestock to walk through.
- It is likely stock, including large mobs of cattle over 1,000 head, will not always move through the long corridor quick enough to avoid all passing trains. The close proximity, size and speed of the proposed trains are expected to shock and panic the stock resulting in crushing, collision and probable loss of life to livestock, stock managers and road users such as those on the high-use adjoining Newell

Highway. These risks extend to livestock within holding yards in close proximity to the passing trains.

- As a result, given there is no feasible mitigation, it is not possible to run the rail corridor through the identified Lots without raising the risk to TSR users and livestock to an unacceptable level.

2. TSR R941 – Barrington TSR

- The proposed alignment of the track will not have any major impacts on the TSR.
- Access to R941 will need to be maintained between Bohena Creek and 'Barrington' property driveway.

3. TSR R44590 – Bohena Creek

- The proposed alignment of the track will not have any major impacts on the TSR.

4. TSR R44590 & R941 - Calrosie TSR

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

5. Biosecurity management

- The rail corridor passes through a range of tenures and land uses including private agricultural farming and grazing land, crown land such as TSR and public roads. As with roadways and other linear corridors of high trafficability, particularly those with origins outside the region, the risk of introducing high risk biosecurity matter such as Cane Toads and Parthenium Weed (i.e. State Prohibited Matter) and/or regionally determined priority weed species into new areas is significantly increased. With a multitude of neighbours, it will be imperative for ARTC to manage and implement its obligations under the NSW Biosecurity Act 2015 to a high standard.
- In a broad sense ARTC has stated within the EIS it will manage its obligations under the NSW Biosecurity Act 2015 using established practices and procedures. These statements are primarily focused on weed management with negligible attention given to pest (feral) animal control. However, NWLLS requires a stronger transparent commitment to implementing the general biosecurity duty given the high-risk pathway created and the potential biosecurity risk increase for a multitude of neighbours and the region as a whole.

6. Planned number of trains per day

- There is conflicting advice on the number of trains between the EIS (i.e. 14 trains per day) and earlier project consultation to stakeholders by ARTC (i.e. 25 trains per day). There is significant difference and associated expected level of impact between the two figures, and as result, stakeholders are likely to underestimate the level of impact from the number of trains. NWLLS advises the maximum potential number of trains be communicated so the full extent of impacts can be known to affected stakeholders.

Recommendations:

1. As a condition of approval, Folios 6/1195493 and 7/1195493 are to be excluded from the rail corridor alignment requiring ARTC to seek an alternative and more appropriate rail corridor placement immediately north of Narrabri.
2. As a condition of approval, ARTC are to consult with NWLLS prior to finalisation of the corridor infrastructure design to ensure appropriate unencumbered access to all relevant TSR is provided including R44590, R941 and R27999.
3. As a condition of approval, an ARTC representative who manages biosecurity issues is required to be a member of the North West Regional Weed Committee and attend all meetings as required.
4. As a condition of approval, ARTC are to develop and implement a publicly available biosecurity management plan within 12 months of determination in consultation with NWLLS to address all biosecurity matter management including weeds and pest animals.
5. Prior to determination of the project, ARTC clarify with stakeholders and the community the potential maximum number of trains expected to use the infrastructure per day.

If you have any questions or require clarification, please contact Matthew Davidson, Manager Land Services on matthew.davidson@lls.nsw.gov.au or 0429 120 007.

Sincerely,



James Hutchinson-Smith
General Manager
North West Local Land Services