SUBMISSION TO DEPARTMENT PLANNING, INDUSTRY AND ENVIRONMENT

INLAND RAIL EIS

NARROMINE TO NARRABRI SECTION.

Our names are David and Catherine Peart. We are farmers with property on the N2N section of the inland rail, specifically the Curban to Mt Tenandra section. Our property sits at the edge of the Gilgandra shire, with access on the Box Ridge Rd.



We have owned this farm for 25 years, and our extended family has been in this locality for many generations.

The inland rail transects our farm in 2 separate places, and there is a large proposed Construction Impact Zone (CIZ) proposed to take up a large portion of our front paddock.

Please find attached separate map showing our farm boundary and impact of Inland rail route

Our Key objections to the inland rail and the information in the EIS, are as follows

ROUTE PLANNING AND SELECTION PROCESSESS

- We have seen no concrete evidence of the process to justify the selection of this corridor. Why is it deemed to be more efficient and cost effective to build a new line compared to upgrading the existing line on the old line to Coonamble, and then following road lines to Narrabri.
- Selection of a railway line to Coonamble would have also facilitated a development of a freight modal to connect the large grain growing areas of the north west to the inland rail. As the line stands at present, this region will not benefit from any freight connectivity with the Inland Rail.
- The existing railway line to Coonamble on the west of the Castlereagh river does not have the issues related to high velocity watersheds off the Warrumbungles.
- The current alignment for the inland rail goes right past the Proposed Narrabri CSG Gasfeild and water treatment plant. This project has faced strong community opposition. If this route has been chosen to help facilitate this development, then ATRC and the government should declare this.
- We have a concern that at first, we will have a railway transecting our property but may end up with a gas pipeline as well. We would appreciate it if the committee could help us obtain answers relating to this. No one we have ever questioned from ARTC regarding this would ever give us answers. We also wonder whether this was a swaying factor for this route selection?
- Despite a senate enquiry, and persistent pressure from NSW Farmers, there is still no clear justification as to why this greenfield route was chosen. Given the severe and long-term impacts this will have to landholders as described in ARTC's own Social Assessment for EIS, this needs to be justified before the project progresses further.
- The inland rail still has not secured links to ports at either end of the line. These would appear to be the most difficult and expensive to acquire. Why is this not being sought first? The usability and economic viability of the line depends upon it. Why are ARTC pushing ahead with inland sections if these port connections have not been established. We are not just affected farmers, but also taxpayers, and we would like to know that our taxes are being used in viable infrastructure projects.

FLOODING AND HYDROLOGY

• The selection of the current route requires it to traverse high velocity watersheds off the Warrumbungles.

- Selection of the route to Coonamble along the existing railway line on the west of the Castlereagh does not have these issues.
- ON 19/3/2019, I attended the Inland Rail Community Consultative Committee meeting in Gilgandra. At this meeting ARTC gave a presentation on flood modelling. At this meeting the presented informed us that they had no records or Data on the Baronne creek (this is the creek that transects our property). Since then ARTC have not installed any measuring data on this creek. Given that this project has been proposed for many years, I find it difficult to understand why they have not done so, given that they themselves admitted that they did not have any historical data to assist in models.
- I offered for the hydrologist to contact us, and this never occurred. If this has happened at multiple sites, it draws into question the accuracy of their flooding models.
- The placement of the railway here will undoubtable have significant water management issues for our operation. We are concerned about the loss of productive area from erosion, water logging of crops, flooding and damage to infrastructure in times significant rain events.
- Watercourses on our property have changed over past 25 years. This has occurred due to sediment deposits and also blocked culverts at a nearby road crossing. This means that even well-planned culverts and bridges, can become dysfunctional, and even worsen flooding over time as watercourses change. What is the legislated protection for landholders that ARTC will maintain and clean out culverts after construction?

NOISE AND VIBRATION

- Our dwelling is within 1 km of the proposed rail line.
- The EIS details that there is likely to be noise levels above the maximum limits for dwellings this close to the line, and ARTC state that they will undertake mitigation measures.
- What is the situation for landholders if the Levels cannot be mitigated sufficiently below the maximum levels? Do the landholders have any say in which mitigation measures are employed? And what will be the recourse if these measures are not effective.

ACCESS ISSUES AND NEED FOR CROSSING POINTS

- The proposed inland rail route severs our all-weather access to the Box Ridge Rd.
- The current maps indicate a crossing on our access road, but the EIS is not clear as to the specifics of whether, and how this will be maintained during construction
- This crossing will also need to be wide enough for us to cross with large machinery such as headers, sowing rigs and spray rigs for farming purposes. We are seeking guarantee that this will be the case. The proposal in EIS is not specific in the design of the crossing and guarantee of access for all our agricultural needs.
- We are concerned that during construction, we will need to be able to access the box ridge Rd for work, and emergency purposes. Our farm does have a secondary exit to the national park road, but this is cut off by the impassability of the Baronne creek within our property after even small flows of water.

CONSTUCTION IMPACT ZONES

• We have been unable to find anything but the passing mention of the CIZ's and their impacts in the EIS.

- Our property has a large CIZ proposed on DP66/754192.
- Our correspondence with ARTC states that this will be leased for the entire period of construction of the whole section. There is no mention of how this lease value will be determined.
- We actively practice "controlled traffic" (CT) for our cropping activities. This is where we keep over 98% of all paddock operations on the same tracks, set by GPS. The sole purpose of this is to keep soil compaction, caused by machinery (wheel compaction caused by tractors, planters, spray operations) on the same tracks, thus compacting an absolute minimum area as possible. This maximises soil health and productivity
- ARTC have informed us that this CIZ area would be used to store machinery, ballast and a concrete batching plant. This high level of compaction of this ground would have long term ramifications for productivity for years beyond the lease time frame.
- Compaction limits plant growth as it impedes the plant's ability to source water and nutrients through the soil profile. The large proposed CIZ zone would absolutely compromise these efforts and leave us with a legacy of severely compacted and thus unproductive soil.
- This cannot be remediated quickly and will take years to bring back to full production. How will landholders be compensated for this. A similar analogy would be leasing a freezer off an ice creamery, and then giving it back to them after the lease, but not allowing them to turn on the power for years. You just can't produce product that way.
- The EIS mentions that ARTC will remediate Borrow pits but provides no details as to how it would remediate CIZ's. They seem conspicuously absent from the report.
- We have contacted ARTC in Oct 2020 and explained our concerns, and requested that this CIZ be located elsewhere, in a location such as nearby unused travelling stock route (TSR) or crown land. We have had no confirmation that they will do this.

THE EFFECT OF PROPERTY BEING CUT BY RAIL LINE

- The proposed railway line will sever a portion of our farm that we will no longer be able to access, so we are under the understanding that ARTC will have to purchase this from us.
- In addition to this, we will have significantly reduced productivity in our front paddock due to the triangulation of the area. With our use of wide farming equipment, headers and sowing rigs of 12 mtr wide, and spray rigs of 36 mtr, it is impossible to farm into the sharp corners of triangular paddocks.
- For this farm to be viable, we need to maximise the acres farmed. The proposed position of the Inland Rail not only reduces the acres we will own to farm but will also decrease the useability of those acres we have left. I do not see that this has been accounted for in the Economic Impact Assessment.
- The proposed positioning of the CIZ in the paddock also severs off other sections that we will be unable to access to farm during the term of the lease (see attached map), but that ARTC appear not to intend to lease. The placement of the CIZ seems to have been done without any consideration on the impact to the landholder. ARTC did not even contact us about it before it appeared on the final map.

IMPACTS ON GROUNDWATER

• The groundwater tech report in the EIS states that

'Overall, subject to detailed design investigations and with implementation of the proposed mitigation measures, the proposal is expected to have minimal impacts on the upper groundwater systems which are relevant to existing bores, the water table and GDEs. Temporary depressurisation of groundwater is likely to occur in the groundwater systems that the proposal's bore field bores would extract groundwater from. However, these groundwater systems are generally very deep and considered unlikely to significantly interact with the shallow groundwater systems applicable to existing bores, the water table and GDEs.

- My concern is that there are no details about what would be done if the impacts are greater than expected. Although on our farm we utilise rainwater for household use, all our stock and farming requirements come from Bore water. I understand that ARTC state that they will be drawing from different aquifers, the risks from interconnectivity of these aquifers through drilling is not clear.
- If we lose our bore water supply, our business will cease. These are high stakes risks for us.
- Many of the graphs and information appears to be the same as those utilised by Santos in their application for the Narrabri Gas field. The modelling used by Santos was heavily criticised in submissions to the IPC by independent hydrologists.
- We are concerned that if the groundwater supply is contaminated or reduced will have catastrophic ramifications for farms and communities.
 - What will be the recourse for these individuals and communities?
 - Will those individuals if they do not fall exactly on the railway line have any recourse of compensation?
- It is also stated in the report
 - Construction water supply options would continue to be explored during detailed design and could include reuse of excess water from the Narrabri Gas Project
- Will landholders be able to refuse to have recycled water from the Narrabri Gas project?
- Concerns were raised at the IPC hearings into the Narrabri Gas Project in relation to the quality and potential contamination of soils from use of this water.
- We and potentially many other landholders would have concerns about this contaminating our food production areas and would like the right to refuse its use.

ECONOMIC BENEFITS ASSESSMENT RESULTS ARE QUESTIONABLE.

The economic assessment report stated

The results of the economic benefits assessment estimate that the proposal is expected to provide a total of \$258.9 million (\$2019 present value terms) in incremental benefits to the project area ¹⁶ (at a 7 percent discount rate). This consists of \$243.72 million in freight benefits and \$15.18 million in community benefits (\$2019 present value terms).

The economic impact of the permanent removal of agricultural land is estimated to be a loss of about \$1.54 million per year, which is equivalent to about 0.16 per cent of the annual value of agricultural production in the study area. The economic assessment concludes that it is expected that this impact would be offset by the regional economic benefits identified

- I find the above comparison difficult to reconcile. The benefits to regional areas due to freight and increased transport connectivity only occurs if there were freight depots or connections guaranteed for our region. This is not currently on the plans. The words "Potential rail link" give no guarantee. Also, the lack of connection to port makes this less relevant to agricultural production.
- As I have outlined in relation to our 1 farm, the economic loss of productivity goes beyond just the loss of acres purchased for the railway and include
 - \circ $\,$ Compaction of ground during construction in CIZ $\,$

- o Triangulation of farming areas resulting in decreased farmable hectares
- \circ $\;$ Decrease farmable area caused by zones along increased areas of fence line
- When you add up the additional loss of productivity from all farms affected, I believe that the decreased productivity would be far greater that \$1.54 million.
- Local agricultural producers who will bear the majority of the negative impacts from the construction of the railway, will not have any opportunity to benefit. There is no congestion on our roads to be offset and there is no planned capacity to integrate local agricultural freight onto the line.
- This railway is an intercity rail link and has been incorrectly marketed as an "Inland rail", implying that it confers benefits to inland communities. Without connection to port at either end, this railway will never reach its potential given in its business case.
- There is no clear outline as to the budget available to compensate affected landholders, and what is the contingency if this is exceeded.
- What is the budget to compensate nearby landholders who do not have railway transecting their properties, if they experience situations such as groundwater contamination or loss? They will not have access to just terms legislation for compensation.
- The placement of greenfield line significantly decreases the commercial value of our property. The use of existing line would have not changed the values of the farms it already transects.

I urge the Department of Planning, industry and Environment to carefully assess the claims made by ARTC, and ensure they are held accountable to the community, the landholders and the taxpayer. Specifically

- 1. The route selection Parliamentary enquiry must be allowed to make recommendations before the project progresses any further.
- 2. Port access at Brisbane and Melbourne should be achieved before inland route progresses
- 3. Compensation must be available for both directly and indirectly affected landholders on and near the route
- 4. Landholders must be given a right to refuse use of wastewater from sources such as Narrabri Gas project near their property as it could potentially impact food production and health
- 5. Landholders must be given a say on placement of CIZ lease Zones
- 6. Landholders must be given a say in placement, type and use of culverts to mitigate impacts of flooding
- 7. Guarantees must be given that the culverts will be kept functioning, free of debris and sediment.
- 8. Landholders must have a clear avenue for compensation from negative sequalae from construction of the inland rail and its presence.

With many thanks for your time and consideration

Catherine and David Peart