

Minister of Planning
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Minister,

RE: Letter of objection to the Preferred Infrastructure Report for State significant infrastructure application SSI-9487 Inland Rail – Narromine to Narrabri

In addition to our original submission made to the DPIE titled "Submission in Response to the Exhibition of the EIS Inland Rail Narromine to Narrabri (N2N) Project" on 7 February 2021 we would like to submit the following information for the DPIE to consider and particularly the NSW Minister for Planning, as we still believe the project should be refused and NO approval given.

We believe ARTC's response to the issues raised in our original submission have again not been addressed adequately and with honesty. Our family and community are still awaiting answers to numerous questions we have personally asked of them over and over again. They continually refuse to answer these questions, they continue to ignore and do not make any acknowledgement of their wrong doing and the interference we have experienced in the route selection process, particularly in our Burroway to Curban section of the greenfield alignment for N2N. We have specifically reviewed ARTC's Report: Appendix A - Where issues raised in community submissions are addressed. We have read the response given by ARTC to the issues that they have indicated refer to our submitter ID in each section of their response.

To begin, we feel it necessary to introduce ourselves again and describe the community we live in, with an extract taken from our attached Appendix A (referred to later in this submission), for your information and consideration. We will then address the issues ARTC has linked to our original objection identification and follow up with our response.

INTRODUCTION - OUR FAMILY'S STORY

We have continually insisted on an inquiry into Inland Rail and are hoping the inquiry will look into the collated information and the results ARTC have used to determine their preferred chosen route. ARTC is playing the most significant role in this "nation building project" its integrity, honesty and reliability is paramount if this project is to succeed. ARTC and its employees should have conducted proper thorough analytical studies, conducted extensive landowner one on one consultations and reported with honesty and integrity in order to fulfil its obligation to the people of Australia and the government that has engaged them. Regardless of the current government's intent to hurry up and push the project through, we would hope our political representatives and those who run organisations like ARTC have good ethical morals and strive to do their best as the commitment they have undertaken requires

Our family are fourth generation farmers. Our land lies directly on the path of ARTCs Narromine to Narrabri (N2N) preferred green-field route between Burroway to Curban. Our family over the generations have farmed here for approximately 100 years.

We farm with our three adult children who also intend to continue farming on our properties with their own families in the future. We own and operate our properties with our parents. We all reside closely together on these properties. Our network of land ownership and farming operations have

improved and grown considerably over our family's existence and we are absolutely devastated that Inland Rail now threatens to take all of that away from us.

We operate our family properties as a group of farms. Ownership of each property is held in different names but the properties are farmed together as a collective group. We have a mixed farming operation of livestock and cropping across all properties.

The current chosen corridor of Gilmours Road Alternative creates major operational severance for our family's farming enterprise. Our day to day activities of accessing all of our properties will be significantly impacted. Two of our properties (where we and our parents currently reside) hold all plant and machinery, workshops, storage sheds and silos as well as homesteads. These two same properties contain all of our cattle and sheep holding yards, ramps for transport loading, fodder storage sheds & silos and shearing sheds. Our core property (where our parents reside) will have the current chosen rail alignment corridor wrap around it on both sides – severing operations and access to our other properties (one of these is where our son and partner reside). All livestock movements and heavy machinery movements between all of our properties pass through our core property.

MAIN COMMUNITY THROUGHFARE

We are only one of the many multi-generational farming businesses in our area that will be significantly impacted by Inland Rail and ARTCs current chosen corridor.

The Burroway to Curban section of Inland Rail is a highly productive farming area which includes many multi-generational family businesses, particularly in the Coboco and Kickabil area. These farms are well established successful farming enterprises that have operated and contributed to agriculture in our local regions for over 100 years.

Many of these multi-generational farms involve ownership of a network of interconnecting (smaller to medium sized) properties throughout the district. A lot of these properties are owned/purchased in different names (as the family grows) but nevertheless are used to operate as a collective group of farms within the families. Most have been purchased as family businesses grow through the generations and when other property, preferably and usually neighbouring, becomes available for purchase. Therefore, when ARTC along with local government and Political representatives state, for example – only 100 landowners will be impacted – then that is simply not true!

Operational severance and farm economic viability can be significantly impacted by a whole family group, even though Inland Rail may pass over or along only one or two of their property boundaries. You may have only one family member residing on that one property (or ownership of that property being in one name) but unfortunately the livelihoods and business of all the other family members (who haven't been counted for in that example of 100) within the farming group will be impacted as well.

A main community thoroughfare including Mawbeys Rd, Old Mill Rd and Gilmours Rd is used for community, families and landowners as access to their network of properties in our area.

ISSUES INDICATED AS BEING ADDRESSED FOR US BY ARTC

8.4.1 Adequacy and information provided. *Adequacy of the consultation process and information provided.* Issue: Some submitters expressed concerns that they did not receive adequate information about the proposal or enough consultation throughout the planning stage

8.4.2 Consultation process. *Queries about the consultation process.* Issue: Some submitters queried the consultation process and requested further information/clarification such as:
- Clarification on accountability if attendees' names are not released after workshop decisions are made

7.8 Options considered

Using existing rail lines. Issue: Submitters suggested that the railway use or align with more existing lines. Rail lines that were noted include the Coonamble/Gilgandra/Dubbo line

How the route could be altered. Issue: Recommendations on how the route could be altered to decrease impacts and costs were provided, including:

* Using existing major roads * Reconsider option 101 with a possible variation running along the western side of the Newell Highway

10.3.4 Issues beyond the scope of the EIS. *Out-of-scope issues.* DPIE Please note in our submission we did not refer to any of the concerns identified or noted under this item of response by ARTC.

8.1 Assessment and approval – process.

Reliability and review of project documents. Issue: A submitter queried if the proposal's methodology, consultation and reports could be relied on, and if the project team had a commitment to honesty and integrity. It was recommended that project documents be independently reviewed for inconsistencies and inaccuracies.

Project should not be approved. Issue: Some submitters noted that the proposal should not be approved.

10.3.2 Issues relating to other Inland Rail Projects or Inland Rail as a whole. DPIE Please note in our submission we did not refer to any of the concerns identified or noted under this item of response by ARTC.

10.2 Costs and funding. *Financial viability and validity of business case.* Issue: A number of concerns were raised about the financial viability of the proposal.... The validity of the business case.

9.13.2 Operation impacts.

Effects on business during operation. Issue: Concern was raised that the proposal would negatively impact on local business. Issues raised included:

* The proximity of the rail close to business would alter the way the business operates due to safety concerns from train movements.

Benefit to rural communities. Issue: Some submitters felt that the proposal would not benefit rural, inland communities in NSW

8.3 Assessment and approval – adequacy and content of the specialist assessments. DPIE Please note in our submission we did not refer to any of the concerns identified or noted specifically under this item of response by ARTC. However we did make general comments in our submission regarding the fact that ARTC did not conduct necessary social impact, environmental (including hydrology) and economic benefit studies prior to choosing the N2N alignment, these studies should have been conducted thoroughly before all options available for route alignment were discarded. ARTC and specialists did not properly assess these studies **before** and preferred corridor(s) was chosen and approved. We consider it was **crucial** for these studies to have been conducted before the final route

study corridor was approved. After reading ARTC's response we still believe appropriate studies were not thoroughly conducted before the chosen N2N corridor was locked in.

9.11.8 Compensation. Issue: Some submissions queried the compensation that would be payable for the effects of the proposal. DPIE Please note in our submission we did not refer to any of the concerns identified or noted specifically under this item of response by ARTC. However we did make general comments in our submission questioning - what will the overall compensation costs to Inland Rail actually be to the taxpayers of Australia when you consider all of the multi-generational farming businesses – which now have their entire family business viability and family livelihoods significantly impacted by this N2N greenfield alignment? We know ARTC have not fully addressed this issue and those compensation costs have not been fully assessed and included in the Inland Rail business case. Individual landowners and family farming groups still don't know the extent of total impacts the project will have on them because ARTC continue to refuse to answer questions regarding property and operational severance, access and crossings, hydrology, etc. – specific to their farms.

8.2 Assessment and approval – adequacy of the EIS.

Concern regarding the adequacy of and the detail provided in the EIS Issue: Submitters raised concerns that the EIS was inadequate, had insufficient detail, omitted certain topics and was not based on the detailed design. Concern was raised that negative impacts were not properly investigated.

Validity of the assessment. Issue: It was suggested that the EIS could not be accurate or valid. Some submitters noted this was due to it being based primarily on desktop assessment with minimal consultation undertaken.

9.11.4 Internal property access issues

Internal access changes and property impacts. Issue: A number of submitters raised concerns about how the presence of the rail corridor across/within their properties, and associated segregation, would affect how they would move around and access different areas within the property; and how they would use the property. Issues raised included:

* How machinery and stock would be moved around the property * Land would be separated from the farm's infrastructure

Provision of private level crossings/access across the rail corridor. Issue: Concerns were raised and requests were made in relation to the provision of private dedicated crossings within properties to enable property owners to move stock and machinery across the rail corridor. These included queries about what would be provided, how crossings would be designed, and whether properties would be provided with private level crossings

Moving stock safely. Issue: Concern was raised about safety issues associated with moving stock across the rail line

9.11.11 Other land use and property issues. Plane Spraying OR Narrabri Sewage Treatment Plant OR Energy supply DPIE Please note in our submission we did not refer to any of these concerns identified or noted under these items of response by ARTC.

9.15.2 Operation impacts Risk posed by train operation and level crossings. Issue: A number of submitters raised concerns about an increased risk to people using railway crossings. DPIE please note we specifically mentioned the safety issues of bringing Inland Rail into our community's main thoroughfare – whereby access to all interconnecting properties within our community takes place.

7.7.1 Route selection process.

Concerns about the route selection process. Issue: Some submissions requested information about how the preferred route was selected. Concerns were raised that the route selection process was biased, poorly managed, lacked transparency, routes were inadequately assessed, and the process did not incorporate local preferences or knowledge. Submitters expressed concerns that not all route options received full consideration. Comments made included:

- * the desktop analysis was insufficient and community impacts were not considered
- * there is no clear justification as to why the greenfield route was chosen
- * route changes late in project cycle without proper consultation were inappropriate and have led to inaccurate cost-benefit analysis.

Multi-criteria analysis. Issue: Concerns were raised about the multi-criteria analysis and how it was used as part of the route selection process. Issues raised included:

- * The outcomes of the multi-criteria analysis did not reflect the costs and benefits of routes or community preferences.
- * The workshops were poorly conducted and documented, and contained inaccuracies in the analysis and resulting reports.
- * Landholders were not properly informed of meetings and were not given information required to engage with them.
- * The multi-criteria analysis process was done without data on hydrology, EIS, land use and soil types.
- * Study areas were added to the multi-criteria analysis throughout the workshops without informing affected communities, impacting the fairness of the results.
- * ARTC did not disclose the expansion of the multi-criteria analysis and options report study areas, resulting in the omission of data necessary to make a fair decision.

Independent review and re-evaluation. Issue: Some submitters suggested that the route selection process needs to be independently reviewed and revaluated. It was suggested that updated information be applied to the multi-criteria analysis to test its validity. It was suggested that the route be reassessed. *DPIE please take the time to review our attached Appendix A (referred to later) for a better understanding of the issues we as community and landowners have experienced with ARTC's route selection process – it is important these MCA documents and the comments made toward them by us and their inaccuracies, referring to interference, be reviewed and reassessed independently of ARTC. We disagree entirely with ARTC's response to this issue.*

7.7.2 Community engagement during route selection. Issue: Concerns were raised that community engagement during the route selection process was insufficient. *DPIE please refer to our Appendix A regarding our experience with community engagement in comparison to ARTC's account of it. The timeliness of engagement (especially with impacted landowners) and the timed public release of important documents referring to route selection are crucial information that needs to be properly analysed, especially if this project is to be assessed with honesty and integrity.*

HAVE ARTC ADEQUATELY ADDRESSED OUR ISSUES?

After reading ARTC's response to our submission's issues we can confidently say we still believe ARTC are continuing to ignore and address the real concerns raised. The underlying important issues we have tried to address through our questions and the information provided in our submissions are still being ignored. We still OBJECT to the project and believe the DPIE and the NSW Minister for Planning should NOT accept ARTCs responses as adequate.

Please see attached, in Appendix A, our submission we provided to the Legislative Committee for their inquiry into the Inland Rail project and regional NSW (also in February 2021). This submission is very similar to that submitted to the DPIE in response to the exhibition of the EIS Inland Rail Narromine to Narrabri (N2N) Project, of which we objected to, with some additional information included.

It appears ARTC continue to refuse to acknowledge the inaccuracies and inconsistencies of their data collection process, particularly in the initial stages of the route selection process. They continue to refuse to answer the questions so often asked of them regarding the MCA reports and the recommendations made in those reports, which ultimately lead to the chosen N2N corridor in NSW. Please note DPIE and Minister, ARTC made no particular reference at all to any of the MCA Reports used in their route selection process in response to our submission's issues. We request the DPIE and Minister review those MCA Workshop Reports, review also the comments made regarding their release dates and inconsistencies with recommendations etc. – in order to determine for themselves, if ARTC have responded adequately to our issues raised. These issues have been brought to the attention of senate estimates hearings, inquiries investigating Inland Rail for the N2N and still no one is enforcing that they be reviewed independently to determine the correctness of our accusations, we continue to ask why?

We believe the route selection process had been interfered with and we believe that process should be revisited, reviewed, re-assessed and re-evaluated - preferably by someone independent and unbiased. ARTC did not competently complete the task it was engaged to complete by the government of Australia and unfortunately, for the taxpayers, ARTC have been allowed to continue with the project regardless.

We believe an Anti-corruption Committee would be an ideal body to review ARTC's handling and management of this project and we would happily welcome one to come to the table.

Furthermore, in our original submission (pg 5 of 14) we mentioned ARTC's Route History 2006-2019 document – referring to it as a report created well after all the inconsistencies and discrepancies with their consultation process became apparent and were questioned. Please see attached In Appendix B the additional information submitted to the extended Inquiry into the Management of the Inland Rail project by the Australian Rail Track Corporation and the Commonwealth Government (submitted in August 2021) for your information.

Please be advised – we are members (as referred to in our Appendix A) of a collective group represented by NSW Farmers and Peter Holt, and we would like to advise you that we completely support and approve of their submission also in response to ARTC's Preferred Infrastructure Report.

Finally, thank you for taking the time to consider our submission. We would happily answer any questions you may have with regards to the contents of our submission. Please find Appendix A and Appendix B attached for your information.

Kind regards
PR & WG Galley

END OF SUBMISSION - **APPENDIX A & APPENDIX B TO FOLLOW**

