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Contact: Randall Medd

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Team Leader -Transport Assessments, Planning and Assessment,
Department of Planning, Industry and Environment,
Locked Bag 5022
PARRAMATTA NSW 2124.

Dear Mr Fallon

**SUBMISSION TO THE INLAND RAIL –NARROMINE TO NARRABRI
ENVIRONMENTAL IMPACT STATEMENT**

Thank you for the opportunity to provide a submission in response to the public exhibition of the EIS Inland Rail Narromine to Narrabri (N2N) Project

91km of the N2N project is located in the Gilgandra Shire Council Local Government Area. Council believes this makes our community one of the most impacted in NSW and Council are of the opinion more needs to be done by the project proponent and other levels of Government to work with impacted stakeholders in our community, including Council

Gilgandra Shire Council has been, and continue to be a supporter of the Inland Rail project. There are potentially significant opportunities for our community from the construction phase and the operations of Inland Rail and the possible associated support industries. Notwithstanding this statement, Council acknowledge the project directly impacts a number of landholders in the community, indirectly impacts numerous others and finally the scale of the construction will most certainly impact the entire community in some form. These impacts will be positive and negative

Some of the directly impacted landowners and others in the community are opposed to the project in its proposed form and are of the belief the Inland Rail alignment should follow existing rail corridors. Council in part, support this position and where possible the Inland Rail should utilize existing rail corridors. The project proponent and Federal Government have elected to follow a Greenfield alignment and Council response to the EIS assess the project in that context.

Council has tried where possible to facilitate opportunities and presented this information to ARTC and the Deputy Prime Minister in his capacity as Infrastructure Minister.

Gilgandra Shire Council are of the opinion the EIS fails to provide sufficient detail for the community and Council to understand and assess the full impact of the project. Council is deeply concerned the approval process for State Significant Infrastructure

(SSI) facilitates the deferral of detail in the EIS to the development of various Construction Environmental Management Plans and other post approval plans.

This poses a significant challenge for our organization as the proponent will be presenting huge quantities of data and plans for council input over the next 6 to 12 months at a minimum and likely beyond as variations to the approved project are sought.

In addition, Council are concerned there will be an increase in "consultation fatigue" as the community are continually asked to comment on the plethora of plans the EIS proposes to provide at a point in the future.

Gilgandra Shire Council, with the assistance of contracted subject matter specialist has prepared a detailed submission. This has been done at a considerable cost to Council and our community. Council would like it to be noted that responding to the EIS and dealing with the Inland Rail project has been done so at Council and the communities expense rather than the project proponent (ARTC Inland Rail) and the Australian Government.

Unlike State Significant Development or Local development approvals in NSW, Council cannot enter into a Voluntary Planning Agreement or enact a Section 94 contribution from this project. This submission is unlikely to change that process but it is imperative that government and the community be aware of the significant cost local councils are encumbered with in the assessment of SSI projects.

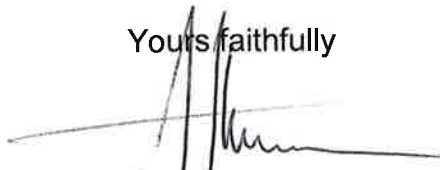
The scale of the EIS, the technical nature of aspects of the project and the extremely tight timeframe in which to review the documentation made it impossible for Council to undertake a diligent and adequate review and prepare a submission with our limited internal resources.

Council is unclear whose decision it was to place the EIS on public exhibition over the Christmas period but we are of the belief that it was a poor decision and has impacted our community's ability to respond. We note there was additional time added to the exhibition period to allow for public holidays, however this does not deter from the fact that Council and the community were placed under significant time pressure to respond.

Council believe the N2N project requires an integrated planning and approval response and request NSW Planning Industry and Environment closely examines the impact of the SSI approval framework has on under resourced Councils in the region.

We thank you for the opportunity and refer you to our detailed submission.

Yours faithfully



David Neeves
General Manager

