



5 January 2021

Planning Services
Department of Planning, Infrastructure and Environment
PO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

RE: STATE INFRASTRUCTURE APPLICATION NO. SSI-9487 INLAND RAIL – NARROMINE TO NARRABRI

Thank you for the opportunity to provide a submission in relation to the Environmental Impact Statement (EIS) for the proposed Narromine to Narrabri (N2N) section of the ARTC Inland Rail Project that has been lodged with the NSW government under State Significant Infrastructure Application No SSI-9487.

The railway route currently proposed under SSI-9487 involves the construction and operation of approximately 306 kilometers of rail track and associated facilities in a new rail corridor between Narromine and Narrabri. Coonamble is central to the N2N project, which will be the longest section of railway proposed within the entire Inland Rail corridor. Approximately 34 kilometers of railway is currently proposed to be located in the Coonamble Shire, along with a proposed maintenance siding and crossing loop, three new level (road) crossings and multiple waterway crossings and culverts.

Coonamble Shire Council continues to state the strong case for the N2N section of Inland Rail to transverse and provide direct access to the Coonamble township. Council has previously provided submissions on the Inland Rail Project advocating for the Coonamble connection, which include:

- Coonamble Shire Council (CSC) submission (November 2019) to the inquiry into the management of the Land Rail Project by the Australian Rail Track Corporation and the Commonwealth Government.

- CSC Expression of Interest (October 2019) to the Inland Rail Interface Improvement Program Productivity Enhancement Program for Coonamble to be included on the inland rail route.
- CSC submission (January 2020) to the Legislative Assembly Committee on Investment, Industry and Regional Development inquiry into the Inland Rail project and regional NSW.

A copy of Council's submissions to these previous inquiries and investigations are attached to this submission. They form the basis of Council's general response to SSI-9487; that consideration of an alternate route for the Inland Railway via Coonamble has not been adequately considered in the EIS, along with all its social, economic and environmental benefits.

Council requests both Federal and State governments to undertake more detailed investigations into the alternate route option via Coonamble township, as a means of providing stronger support to regional communities and reducing impacts along the route currently proposed under SSI-9487, which remains too close to the Warrumbungle Ranges, with all of its associated impacts and challenges relating to roads, drainage, soils, biodiversity, cultural heritage, dark skies / optical astronomy, recreation and tourism.

The following matters have been identified for consideration and assessment of the current application:

P2N Evaluation

With the first section of the Inland Railway - Parkes to Narromine (P2N) nearing completion of its construction phase, many lessons have no doubt been learnt and need to be shared with all stakeholders along the Narromine to Narrabri (N2N) section of proposed railway.

It is important to note that the proposed N2N route of the Inland Rail Project involves arguably far greater impacts than the Parkes to Narromine section of railway, which was largely limited to upgrades to existing railway assets within an existing rail corridor.

Under SSI-9487, a completely new railway is proposed to be created within the Coonamble Shire, along with all its associated land clearing and shaping, vegetation removal, access roads, level crossings, drainage structures and fencing and hardstand areas. All of this work is to be carried out within a largely rural and natural environment that has never experienced development of the scale proposed.

The impacts experienced by rural farming families and natural environments are expected to be significantly more profound than those experienced along the existing Parkes to Narromine Railway.

Drainage, soils, biodiversity, access, road safety, views, noise and water are key issues for the determination of SSI-9487, and require specific and robust environmental assessment as well as comprehensive stakeholder and community engagement to arrive at acceptable solutions for the new railway through Coonamble Shire.

Alternatives and Options

Chapter A6 of the EIS includes a section documenting the assessment of alternative routes for the N2N rail corridor.

It is noted the N2N is generally based on the Narromine to Narrabri via Gwabegar route, as identified in the ARTC Melbourne–Brisbane Inland Rail Alignment Study, 2010. Routes via Coonamble have not been adopted, reportedly due to increased travel times and construction cost.

Coonamble Shire Council believe an alternative railway route via Coonamble would help alleviate many of the concerns raised by members of our community about the current N2N alignment being constructed too close to the foothills of the Warrumbungle Range, with all its associated impacts on overland drainage, soils, biodiversity, cultural heritage, dark skies, farmland and roads as well as impacts on recreation and tourism activities.

Council has reviewed the EIS for the N2N and participated in an information briefing from ARTC held on 20 January 2021 and is convinced more than ever that the drive for efficiencies in travel times and construction costs are overshadowing the longer term social, economic and environmental cost / benefits of the alternate railway route via Coonamble township.

Council requests the Federal and State government gives greater consideration of alternate routes for the Inland Railway via Coonamble, and further away from the Warrumbungle Ranges and Pillaga Forrest.

Proposed LGA Boundary Changes

There is no clear indication or guidance in the EIS as to the extent of Local Government Area (LGA) boundary changes required as a result of the proposed Inland Rail Project (if any).

Council is concerned that any changes to local government boundaries will have implications for affected landholders and Councils. For example, the rates required to be paid by landholders may change as a consequence of border changes. Services may also be altered under a different Council administration system. Council's revenue base may also be impacted as a result of boundary changes.

Additional information is requested regarding any proposed changes to LGA borders, along with an assessment of the implications of border changes on potentially affected stakeholders, including Coonamble Shire Council.

Land-use and Property

The EIS advises the proposal requires both land temporarily (during construction only) and permanently for the proposal's operational infrastructure. The permanent land requirements include use of multiple privately-owned and publicly-owned land parcels in the Coonamble Shire. In many situations, the N2N proposal has potential to affect properties where part of a site is required (requiring adjustments and / or relocation of facilities to other parts of the site), or all of the property is required for rail-related purposes.

Coonamble Shire Council is concerned that the proposed acquisition of private land for rail-related purposes raises complex issues and impacts for farming businesses, including loss of viable farming land and access limitations for movement of livestock, machinery and equipment within properties.

Council requests the amount of land to be acquired is minimised as far as possible. Where farm holdings are impacted by the proposed railway line, it is requested that robust / practical mitigation strategies are arrived at to ensure long term viable of farms affected.

Detailed Design

Many aspects of the railway design are yet to be provided. Similarly, many of the important mitigation strategies proposed in the EIS to address environmental impacts and issues are subject to more detailed designs and environmental management plans.

Lack of detailed designs has the effect of placing limits on the capacity for informed submissions to the N2N Inland Rail proposal. This is especially the case for Coonamble Shire Council, where we believe an alternative railway route via Coonamble would help alleviate the degree of construction and operational impacts of the new railway through primary production lands, areas of significant biodiversity and cultural value and a highly challenged and vulnerable local road network.

The scale of proposed new works under SSI-9487 is such that small changes in the detailed designs from what is presented in the EIS could have major implications for the receiving environment. For example, the scale of fencing and gates required for the project is massive, and the standards of fencing and gates finally chosen will have major implications for wildlife, rural landholders and Council (as the local authority responsible for the management of roads, weeds, roaming stock, rubbish dumping and other regulatory matters).

Coonamble Shire Council requests any and all design plans that interact with the public road, waste management and water supply network to be furnished to Council for approval, including new roads, road upgrades, fencing and gated access, drainage infrastructure and the like.

Council also requests that conditions of consent requiring detailed designs on important elements of the proposed railway should clearly articulate the design intent, design standards, construction techniques, maintenance schedules, stakeholder consultation requirements, monitoring standards and agreement on the procedures for review of design details.

Traffic and Transport Arrangements

Coonamble Shire Council is the road authority responsible for the local road network in the Coonamble Shire.

Unlike the State funded classified road network managed by TfNSW, the local road network is managed under different funding mechanisms that places limits on the amount of capital available to Council to improve roads in response to the intensification of traffic / heavy vehicle haulage operations, flooding or storm damage.

The road network towards the east of the Coonamble Shire is under constant pressure due to storms and runoff from the Warrumbungle Ranges, poor draining and highly dispersive 'black' soils, and the existing condition of the local road network with many roads being unsealed and requiring continuous maintenance.

The EIS states that haul roads for the transport of construction materials will be determined by the location of resources and road access available to the construction site. While the EIS and the Traffic Impact Statement have predicted the overall increase in traffic numbers generated by the construction phase, the local impacts cannot be quantified without the identification of access points, haul roads, gravel resources, water supply sources and the like well before construction begins in the area. Therefore any dilapidation reporting needs to be carried out much earlier in time, in consultation with Council.

Transport of materials by road for the construction of the N2N project will have significant impacts on road assets. In particular, the prevalence of the unsealed gravel network in this part of the shire

means that the network is highly vulnerable to damage caused by increases in traffic / heavy vehicle traffic. In wet weather periods unsealed roads are often required to be closed to protect road asset condition and for safety reasons. It is critical to the integrity of the local road network that road impacts are identified early and agreement is reached on the mechanisms to improve roads prior to the construction phase of the N2N project. Maintenance of the road network during the construction and operational phases of the N2N project are also required.

Assessment of road network impacts and challenges requires a 'whole of network' investigative approach by road and rail authorities prior to the determination of the N2N section of Inland Rail.

Coonamble Shire Council requests a series of meetings be held with ARTC, Transport for NSW and the local road authorities that operate in and around the N2N project to strategically investigate road-related issues and agree on a consistent approach to improve the road network where required.

The terms of reference for these joint road stakeholder meetings could include the following:

- Identification of road users and their requirements, including school bus operators, farmers, and primary produce cartage operators, travelling stock operators, gravel cartage operators, travelling tourists and the like.
- Identification of roads impacted upon by the final Inland Rail route.
- Identification of road access points into the construction segments of the railway.
- Identification of key road intersections.
- Agreement on the method of dilapidation assessment and reporting.
- Agreement on road condition standards to guide the program of road improvements required to prepare the road network for the projected increases in construction traffic along the rail route.
- Agreement on the program of road work improvements required to undertake identified road upgrades.
- Evaluation of the capacity of road authorities to deliver road work improvements within program timetables.
- Identification of mitigation methods required to minimise other road related impacts (e.g. flooding, drainage, soil erosion and sedimentation, biodiversity and road safety issues) as part of the assessment process.

Deferment of the assessment of these important issues to detailed design stage, or as part of the development of a construction / environmental management plans is not considered appropriate given the significant lead times required to properly investigate, plan, design, program and implement required road network improvements.

Council is also concerned about the delays caused to local road traffic from the movement of trains along the Inland Railway, including long trains travelling between Brisbane and Melbourne, as well as other trains making use of the line. Council is also concerned about the increased number of 'dog-legs' required at the approaches to railway crossings and their implications for road safety and maintenance.

All of the above will increase the cost of upgrading, maintaining and depreciating local road assets, and it is not yet clear to Council on how this will be managed. As a general principal to progress the N2N Inland Rail Project, Coonamble Shire Council and its ratepayers should not have to carry any of the extra burdens of expenditure required to fund rail-related road improvements.

Level Crossings

It is noted that a Level Crossing Strategy has been developed which identifies three new level crossings of local roads within the Coonamble Shire. The raised crossing at Combara, while not situated in Coonamble Shire, will also have significant implications for shire residents travelling to and from Dubbo for various reasons.

In the EIS, the locations of level crossing have been identified, but no specific design details have been provided at this stage. Council needs to fully consider the impacts of public road crossings affected by the proposal. Details required for consideration of road and rail interface includes:

- Timing of construction.
- Traffic control.
- Detours.
- Crossing treatments.
- Changes to height of rail head.
- Interface material.
- Changes to drainage (e.g. flow paths, culverts)

Coonamble Shire Council requests a series of meetings be held with ARTC, Transport for NSW and the local road authorities that operate in and around the N2N project to strategically investigate the design requirements for level crossings to ensure all crossings are safe for long term use into the future.

Coonamble Shire Council requests any and all design plans of proposed level crossings within the public road network be furnished to Council for approval. As a minimum requirement, Council requests road approaches to level crossings be upgraded and sealed a minimum 150 meters either side of the centerline of the proposed railway to a standard acceptable and manageable by Council. Where practical, measures should be incorporated into road designs to slow approaching traffic and provide adequate warnings of level crossings. The timing of construction operations on level crossing should also avoid peak traffic periods, such as harvest which generally occurs between October and January.

Council also requests ARTC undertakes additional consultation with key road users, such as transport operators, school bus operators, rural landholders and other land-users that will regularly use level crossings.

Road Culverts and other Drainage Improvements

Multiple new culverts and drainage improvements are proposed to be installed within local road reserves in order to manage overland flows affected by the Inland Rail Project.

Coonamble Shire Council is concerned that the concentration of stormwater flows needs to be carefully managed so as to avoid damage to public road infrastructure and adjoining land-uses and assets, including on-site water storage dams, contour banks, wetlands and the like. Particular care must be taken to design site specific stormwater management improvements that concentrate flows onto adjoining farmland to ensure the correct water balances are achieved that meet the requirements of landholders.

Council is concerned about the cost of maintaining additional road culverts and other drainage structures and systems. As a general principal to progress the N2N Inland Rail Project,

Coonamble Shire Council and its ratepayers should not have to carry any of the extra burdens of expenditure required to fund rail-related road drainage improvements.

Council will accept no liability for rail-related road drainage structures and improvements that lead to damage of the public road network or adjoining land-use due to errors in assumptions and design standards progressed by ARTC and / or its contracted design team.

Socio-Economic Impact

Coonamble Shire Council believes an alternative railway route via Coonamble would provide strong support to the local community in the sub-region.

The socio-economic benefits of the proposal have not been broken down in the EIS by Local Government Area, and it is therefore difficult to determine the level of impacts, both negative and positive, that will be derived from the Inland Rail Project.

Previous Council submissions to the inquiry into the management of the Land Rail Project by the ARTC and Commonwealth Government and to the Legislative Assembly Committee on Investment, Industry and Regional Development provide background and context on Council's views on the socio-economic benefits of Coonamble taking a more prominent role on the Inland Rail route (see attachments). In particular, Council's EOI 2019 to the Inland Rail Interface Improvement Program Productivity Enhancement Program was an attempt by Council to quantify the many social and economic benefits of an Inland Railway route via Coonamble.

Council requests the State government give greater consideration of alternate routes for the Inland Railway via Coonamble, which have not been adequately considered in the EIS.

Public Infrastructure and Utilities

Coonamble Shire Council is the local road authority, water supply authority and waste authority in the Coonamble Shire. Any impact from the project on Coonamble Shire Council-owned public infrastructure must be fully detailed in the assessment of SSI-9487.

As a general principal in response to the EIS for the N2N Inland Rail Project, Coonamble Shire Council and its ratepayers should not have to carry any of the extra burdens of extra expenditure to fund rail-related expansion / relocation of Council infrastructure and services.

Resource Construction Materials and Stockpiling

As the government authority responsible for the administration of the Coonamble Local Environmental Plan 2013, Council is concerned that all quarries proposed to be used in the Coonamble Shire for supply of resource material to the Inland Rail Project have the correct approvals in place prior to the commencement of construction activities.

The location of extractive industries and stockpile areas needs to be identified for evaluation of road improvements and maintenance strategies by ARTC and relevant road authorities (see previous commentary under Traffic and Transport Arrangements).

Council requests that any construction compounds, material stockpiles and hardstand areas be properly designed to include safe accesses onto public roads and adequate buffers between dwellings, waterways and other environmentally sensitive land features. Specific conditions / environmental management plans should be developed for each compound, stockpile and hardstand area to manage drainage, weeds, dust, noise and public safety.

Water Supply

The EIS advises the proposal would require about 4,635ML of water for construction, most of which would be sourced from deep groundwater bores. Water would be used for dust control, compaction of soils and to undertake site concrete works and establish vegetation. The proposed bores targeted for extraction would be from groundwater below the Great Artesian Basin, as the Great Artesian Basin and overlying shallow groundwater system are either close to being or, are, fully allocated.

Council is concerned that the extraction of groundwater can lead to the lowering of the groundwater table or drawdown within the surrounding aquifer. The application of construction water could also result in impacts on the water quality of shallow groundwater and / or surface water due to differences in water quality or being of unsuitable quality for use during construction.

Council requests careful monitoring of water resources during the construction phase of the railway.

Water supplies should not be taken from contaminated water sources, water sources with high salinity content, or from water sources that cannot be sustainably replenished.

Protecting Aboriginal Culture and Heritage

The Inland Rail will be built and operated on the traditional lands of many Indigenous communities. Council requests adequate consultation with the Coonamble Local Aboriginal Land Council (LALC) and any other traditional owner or community groups recommended by the LALC.

Flooding / Overland Drainage

The proposed inland railway crosses several creeks and waterways in the Coonamble Shire, including the Teridgerie Creek. The EIS advises the concentration of overland flows under bridges and through longitudinal drainage and culverts could increase flow velocities and result in scour at outlets and worsening of existing erosional processes within watercourses if scour protection is not provided.

Coonamble Shire Council is concerned about the potential for flooding and drainage impacts on farming properties, dams, roads and natural ecosystems, both upstream and downstream of the proposed railway. The introduction of the new rail infrastructure will change the flooding regime, with the potential to affect surface water flows across floodplains and other areas in relative close proximity to the Warrumbungles (perceived to be flat but with enough of a gradient to result in substantial drainage of storm water towards the west and with the potential to cause significant damage).

Council recommends detailed modelling of the hydrological impacts along the railway corridor as part of the assessment of the SSI Application, to determine site specific downstream impacts of flows from proposed culverts on primary production land, dams, roads, environmentally sensitive land, heritage sites and the like.

Coonamble Shire Council is particularly concerned about the cost of maintaining additional road culverts and other drainage structures and systems.

As a general principal, Council and its ratepayers should not have to carry any of the extra burdens of expenditure required to fund rail-related road drainage improvements. Council will accept no liability for rail-related drainage structures and improvements that lead to damage of the

public road network or adjoining land-use due to errors in assumptions and design standards progressed by ARTC and / or its contracted design team.

Noise and Vibration

The proponent is proposing primary construction hours that include periods outside the recommended standard hours in the NSW Interim Construction Noise Guideline. Council requests that all construction works be undertaken within the standards hours of the ICNG or specific arrangements made with affected landholders to mitigate impacts.

The ongoing operation and maintenance of the Inland Railway will create long term noise impacts for various segments of the local community. Council requests every effort be made in detailed design to minimise noise through planning and alignment of the railway track away from sensitive land-uses and by reducing the extent of track curves. Where noise impacts are projected to exceed accepted criteria, Council requests specific arrangements is made with affected landholders to mitigate impacts.

Soils and Weeds

The EIS reveals a significant program of land clearing and earthworks is required to accommodate the N2N Inland Railway.

Notwithstanding, the significant implications such works will have on biodiversity and habitat of native flora and fauna, the disturbance of soils during construction phases have potential to cause soil erosion and introduce plant species including priority and high-threat weeds.

The EIS provides no specific details on weed identification and management during the construction phase of the Inland Rail Project.

Coonamble Shire Council is concerned that construction vehicles may introduce weeds, pests and pathogens into the shire. Weed hygiene and biosecurity measures are required to protect people and animals against harmful biological or biochemical substances. Council has specific concerns relating to the Hudson Pear (*Cynlindropuntia rosea*) which is known to be in the area and travels through movement of people and vehicles due to its spikes. Boxthorn weed from interstate travel is also a concern.

Council requests that greater consideration be given to the management of soils and weeds in the assessment of SSI-9487 and subsequent imposition of conditions of consent for the development of site specific construction / environmental management plans.

Air Quality

Dust minimisation measures are required to protect nearby housing, crops and road safety conditions along road haulage and / or rail construction routes. The dark skies around the Siding Spring Observatory could also be impacted from large plumes of dust generated at the construction phase of the N2N Inland Rail Project.

Securing adequate water supply for dust suppression is important in properly managing air quality issues in and around the N2N Inland Rail Project.

Council requests that greater consideration of water supply and the application of water to gravel roads, hardstands and surfaces prone to dust problems in the assessment of SSI-9487 and subsequent construction / environmental management plans.

Dark Sky Planning Guidelines

Siding Spring Observatory is Australia's national facility for optical astronomy. Situated in the Warrumbungle Ranges, it relies on the preservation of a night sky unpolluted by artificial light.

It is imperative to the interests of the Australia Telescope National Facility (a Division of the CSIRO) as well as other astronomy groups and tourism, that the provisions of the Dark Sky Planning Guideline are implemented.

Coonamble Shire Council requests that ARTC continue to work with the Siding Spring Dark Sky Committee to ensure the construction and operational phases on the N2N Inland Rail Project meet their standards / guidelines.

Flora and Fauna

The potential impact of the proposal on biodiversity is significant, with the permanent removal of approximately 1,732 hectares of native vegetation within the N2N rail project. This vegetation includes threatened ecological communities listed under the *Biodiversity Conservation Act 2016* (BC Act) and / or the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The EIS states potential impacts would be minimised by implementing the construction mitigation and management measures provided by the EIS. It also highlights the use of biodiversity offsetting as a means of mitigating impacts.

It is Council's view that the EIS does not adequately implement the avoidance of impacts to biodiversity values. Nor has the EIS adequately justified the proposed railway route in relation to the impacts on the Warrumbungle Ranges and Pillaga Forest ecosystems. Council is also of the view that biodiversity offsetting at the scale proposed under SSI-9487 should not be used as an automatic default tool justifying the proposed railway route.

Coonamble Shire Council recommends the proposed railway should avoid areas of high biodiversity value wherever possible. Council believes an alternative railway route via Coonamble would help alleviate many of the concerns raised by members of our community about the current N2N alignment being constructed too close to the foothills of the Warrumbungle Range (see previous commentary under Alternatives and Options).

Coonamble Shire Council supports the N2N proposal being declared a controlled action under the EPBC Act 1999, which requires approval from the Australian Minister for the Environment. From Council's perspective, there is a need for more detailed / independent expert assessment of a proposed railway route that avoids long-term impacts on our already limited biodiversity assets. Council requests further consideration of alternate routes for the Inland Railway via Coonamble.

Where the location of the proposed railway route within areas of high biodiversity value are unavoidable, Council suggests the biodiversity offsets should be robust enough to take into account the impacts on threatened species and communities as well as consideration of cumulative impacts and loss of strategic corridors of bushland within areas of regional and national significance.

Construction Workers

Coonamble Shire Council welcomes the anticipated ARTC construction workers and contractors required for the project as a means of supporting the local economy. Council requests that targets be set in the workforce plans and procurement contracts for procurement of labor, materials and services to ensure that as much as possible is sourced from the local area.

Where Coonamble Shire Council is required / contracted to enter railway lands for road maintenance, weeds management or to exercise its regulatory functions under the *Local Government Act 1993* or other State legislation, a practical regime of work health and safety controls must be administered, including periodic induction and training as opposed to the application of ARTC worker safety standards and supervision instead of application and maintaining certification under the ARTC access permit requirements.

Waste

The N2N project is expected to generate waste from various sources, which will need to be properly managed. Council has limited capacity for the management of waste within its existing network of waste management facilities.

Investigation of waste management facility impacts and challenges requires a 'whole of waste network' investigative approach by waste and regulatory authorities, including EPA and local government authorities.

Coonamble Shire Council requests a series of meetings be held with ARTC, EPA, local councils and any other relevant waste authorities to ensure waste generated from the N2N Inland Rail Project is properly managed, including recycling of materials wherever practical.

Contributions Framework

Many of the issues raised in this submission are based on Coonamble Shire Council's overall concerns that the N2N Inland Rail Project involves a substantial scope of works that all needs to be funded by the project, and not by local government councils.

For example, the financial implications for the local road network needs to be fully identified and costed to ensure a 'whole of network' response to the improvements required to ensure the efficient and safe use of the road network.

As a general principal in response to the EIS for the N2N Inland Rail Project, Coonamble Shire Council and its ratepayers should not have to carry any of the extra burdens of expenditure required to fund rail-related improvements to public infrastructure.

Coonamble Shire Council requests a strategic cost investigation be carried out by ARTC and presented to the Councils along the N2N rail corridor to ensure a consistent approach to the delivery and ongoing maintenance of required road and drainage improvements as well as weeds and waste management. Key topics of investigation / interrogation should include:

- Consistent construction standards for various roads, intersections, level crossings, culverts and other drainage infrastructure.
- Consistent rates for materials, plant and labor hire.
- Funding agreements for infrastructure upgrades and maintenance that meet the requirements of individual Councils.

Ongoing Community Engagement

The public exhibition of the N2N Inland Rail Project is an important milestone in the assessment of the project by Federal and State authorities.

Coonamble Shire Council appreciates the level of engagement that has been afforded to Council by ARTC and the NSW Department of Planning, Infrastructure and Environment. However, it is Council's view that the public exhibition of the N2N proposal during harvest and the Christmas holiday season has been far from ideal for securing the views and comments from residents in the Coonamble Shire.

Coonamble Shire Council has been asked by many local community members to raise a number of important issues on behalf of the wider community, including impacts farming properties, drainage and soils, scarce water resources, local roads and nationally significant natural ecosystems. Council has also been asked to appeal to the Federal and NSW governments to increase the levels of community engagement so far undertaken to ensure the route planning and design of the project will properly examine all of the keys issues raised by stakeholders and potential impacts along the proposed railway route.

Coonamble Shire Council requests that additional consultation be undertaken as part of the development assessment process, including consideration of an alternative route via Coonamble. Council requests that a series of community engagement workshops be held to provide more detail on the key issues raised in this submission. Community groups that Council believes should be invited to attend such workshops are listed below:

- Resource (quarry) operators.
- Farmers and other local businesses affected by the proposal railway.
- Councils.
- Emergency services.
- School Bus Operators and postal contractors.
- Land Council and other Aboriginal community groups.
- Nature groups and other users of national parks, forests and public land affected by the proposed railway.
- Hotels, motels and caravan park owners / operators.

I trust the above information assists in the assessment of SSI-9487 and further development of a sustainable Inland Rail Project for the benefit of all Australians.

Please contact Council's Executive Leader, Environment, Strategic Planning & Community on (02) 6827 1900 should you wish to discuss this matter further.

Yours sincerely



Hein Basson

GENERAL MANAGER